# Wandsworth Schools' Music Service

# **Privacy Policy**

# Purpose

**Wandsworth Schools Music Service (WSMS)** is committed to protecting your personal information and being transparent about what information we hold about you and your child/ren in your care.

This privacy policy is intended for applicants, students, parents, guardians, schools in which students learn, donors and supporters (together 'you or 'music service users')

This policy is to help you understand **how** and **why** Wandsworth Schools' Music Service collects your personal information and **what** we do with that information.

**WSMS** are the data controller for the purposes of data protection law.

### The lawful basis for obtaining and using personal data

**WSMS** need data in order to fulfil its contractual obligations with music services users in order to provide them with the music education for which they or their children have applied. Parents or guardians with children under the age of 13 will act on behalf of their children. Children over 13 years of age are deemed competent to understand this privacy statement.

We will only process personal data where we have one of 6 lawful bases to do so under Article 6 of the EU General Data protection Regulations.

Most commonly:

- To **fulfil a contract** with the individual, or when the individual has asked WMSM to take specific steps before entering into a contract
- For the **legitimate interest** of WSMS (provided the individual's rights and freedoms are not overridden)
- Where the individual (or parent/guardian when appropriate in the case of a child) has freely given **consent**

And exceptionally:

- To comply with a legal obligation
- To ensure the vital interests of the individual e.g. to protect someone's life
- To perform a task in the **public interest**

#### How and why does the Music Service collect and use personal information?

**WSMS** will use the information you provided in the application or registration form. Personal data that we may collect, use and store includes, but is not restricted to:

- Name, date of birth and gender
- Address, email address and contact phone number
- Emergency contact details and contact preferences
- Name of school
- Results of exams/ auditions/ assessments

- Medical and dietary requirements
- Characteristics such as additional learning needs
- Passport details
- Attendance information
- Safeguarding information
- Photo and video
- Instrument loan details
- Student records
- Details of any support received e.g. Pupil Premium or Free School Meals.

WSMS collect this information to ensure that services are run properly and safely. We use this data to:

- Manage the application and audition processes
- Provide music tuition
- Manage registration, participation and progression through WSMS programmes
- Support student learning
- Monitor and report progress
- Provide appropriate pastoral care and ensure welfare of children while in our custody, particularly when on tours and courses
- Meet our legal obligations relating to child protection and safeguarding
- Administer waiting lists
- Manage applications for financial support
- Manage application for scholarships
- Assess the quality of our services
- Enable ethnicity and disability monitoring
- Comply with contractual / regulatory obligations e.g. reporting to Arts Council
- Share with partners for joint activities e.g. London Music Fund/ Wimbledon Tennis
- Administer payments
- Keep you updated with WSMS activities that are relevant to you
- Offer you opportunities to engage further with our activities
- Promote concerts and events
- Celebrate the success of WSMS and our students and raise awareness

### Photographs and video recording

Occasionally WSMS and its authorised partners use pictures, videos or stories for publicity or funding purposes. Such material will be used for example, for publicity purposes; display in buildings; on banners in concerts; on our website and for social media purposes; for assessment and educational purposes and for fundraising purposes.

When using photos and videos for publicity or website/ social media purposes we will not accompany them with any other personal information about the child, to ensure they cannot be identified. We may continue to use these photographs and videos after your child has left the school.

Although we will carefully use images based on the basis of our 'legitimate interests' we understand there may be occasions where music service users provide good reason why we should withdraw

certain images. If you have any concerns about the use of photographs or videos please speak to the Head of the Music Service.

# CCTV

CCTV may be used in partner locations, including schools and council buildings that are used for music service activities, to ensure the safety of the site.

# Data sharing

We do not share personal information with any third party unless otherwise stated in this policy without consent, unless the law requires us to do so.

Where it is legally required, or necessary we may share personal information with:

- Local authority to meet our legal obligations to share information, such as safeguarding concerns
- Schools where we provide tuition for your child in partnership with their school
- Educators and exam bodies
- Suppliers and service providers e.g. examining bodies, tour companies, scholarship providers, concert venues, payroll services, cloud computer service providers, registration services
- Financial organisation to enable payment processing and debt collection
- A student's family and representatives
- Government
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Health and social welfare organisations
- Professional advisers and consultants

# Security of your data

We will put in place appropriate safeguards to keep your personal information confidential and as secure as possible. Your data will only be accessible to authorised staff. We will ensure, as far as possible that any third parties we use for processing your personal information do the same.

Information will only be stored for as long as it is needed or required and will be disposed of appropriately. In exceptional circumstances, we may keep information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Where we transfer data to a country of territory outside the EEA, we will do so in accordance with data protection law.

We undertake to report any data breaches in accordance with Data Protection Act and General Data Protection Regulations guidelines.

#### Your rights to your personal information

- You have the right to request a copy of the personal information that we hold about you
- You have the right to request that any inaccuracies in this data are corrected
- You can ask us to delete the information that we hold in certain circumstances. For example, where we no longer need the information
- You can ask us to send you, or another organisation, certain types of information in a format that can be read by computer
- If we ask for your consent to use your personal information you have the right to take back this consent at any time. Please note that if we can also rely on other bases to process your personal data aside from consent then we may do so even if you have withdrawn your consent

### Further information and guidance

If you would like further information or would like to exercise your right to request a copy of your personal information then please contact <u>DPO@richmondandwandsworth.gov.uk</u>

Wandsworth Council Corporate privacy notice

http://www.wandsworth.gov.uk/info/200316/open\_data\_and\_transparency/1535/wandsworth\_co uncil privacy notice