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DATA PROTECTION AND GDPR POLICY

1. Introduction

Central School of Dancing & Performing Arts ("the School") is committed to protecting the privacy and personal data of its students, staff, and associated stakeholders in compliance with the General Data Protection Regulation (GDPR) and relevant UK data protection legislation. This policy outlines the School's approach to handling personal data, ensuring its security, and informing individuals of their rights regarding their personal data.

2. Scope

This policy applies to all personal data processed by the School, including that of students, parents/guardians, staff, contractors, and visitors. It covers all forms of data processing, including collection, storage, use, sharing, and disposal of personal data.

3. Definitions

- Personal Data: Any information relating to an identified or identifiable natural person (data subject). Examples include names, addresses, phone numbers, email addresses, and images.
- Processing: Any operation performed on personal data, such as collecting, recording, organising, storing, retrieving, disclosing, or deleting.
- Data Subject: An individual whose personal data is processed by the School.
- Data Controller: The organisation that determines the purposes and means of processing personal data (the School in this context).

4. Data Protection Principles

The School adheres to the following principles when processing personal data:

- Lawfulness, Fairness, and Transparency: Personal data shall be processed lawfully, fairly, and in a transparent manner.
- Purpose Limitation: Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Data Minimisation: Personal data shall be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Accuracy: Personal data shall be accurate and, where necessary, kept up to date.
- Storage Limitation: Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary.
- Integrity and Confidentiality: Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- Accountability: The School shall be responsible for, and able to demonstrate compliance with, these principles.

5. Lawful Basis for Processing
The School processes personal data under the following lawful bases:
- Consent: The School will obtain explicit consent from the data subject or, in the case of students under 18 years old, from their parent/guardian, particularly for the use of photos and video footage for social media, promotional materials, show DVDs, or similar purposes.
- Contractual Necessity: Processing is necessary for the performance of a contract, such as student enrolment or employment contracts.
- Legal Obligation: Processing is necessary for compliance with a legal obligation, such as safeguarding or health and safety requirements.
- Legitimate Interests: Processing is necessary for the legitimate interests pursued by the School or a third party, except where such interests are overridden by the interests or fundamental rights of the data subject.

6. Data Collection and Use
The School collects personal data for various purposes, including but not limited to:
- Enrolment and registration of students.
- Communication with students and parents/guardians.
- Administration of classes, examinations, and assessments.
- Health and safety management.
- Promotion and marketing of the School's activities.

Personal data may be collected through various means, such as application forms, emails, surveys, or photography and videography during School activities.

7. Photography, Video Footage, and Media Use
By enrolling at the School, students and/or their parents/guardians (if the student is under 18 years old) consent to the School using photos and video footage of the student for the following purposes:
- Social Media: Posting on the School's official social media channels (e.g., Facebook, Instagram, Twitter).
- Promotional Materials: Inclusion in brochures, flyers, posters, and other promotional materials.
- Show DVDs: Recording and distribution of School performances or events.
- Website: Featuring on the School's official website.

If a student or parent/guardian wishes to withdraw consent for the use of images or footage, they must notify the School in writing. The School will take reasonable steps to cease further use of the material but cannot guarantee the removal of previously published content.

8. Data Sharing and Disclosure
The School will only share personal data with third parties under the following conditions:
- When required by law or regulation.
- When necessary to fulfill contractual obligations (e.g., sharing data with examination boards).
- With the consent of the data subject or parent/guardian.

All third-party processors used by the School will be required to demonstrate compliance with GDPR and to ensure the security and confidentiality of the data.

9. Data Security

The School implements appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Secure storage systems with controlled access.
- Regular data security audits and risk assessments.
- Training for staff on data protection responsibilities.

10. Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected. After this period, data will be securely deleted or anonymised. The School will maintain a data retention schedule specifying the retention periods for different categories of data.

11. Data Subject Rights

Under GDPR, data subjects have the following rights:

1. Right to Access: The right to request a copy of the personal data the School holds about them.
2. Right to Rectification: The right to request correction of inaccurate or incomplete data.
3. Right to Erasure: The right to request the deletion of personal data where there is no longer a lawful basis for its retention.
4. Right to Restrict Processing: The right to request that the processing of personal data be restricted under certain circumstances.
5. Right to Data Portability: The right to receive personal data in a structured, commonly used format and to request that it be transferred to another controller.
6. Right to Object: The right to object to the processing of personal data based on legitimate interests or for direct marketing purposes.

Requests to exercise these rights should be made in writing to the School's Management. The School will respond to such requests within one month.

12. Data Breach Management

In the event of a data breach, the School will:

1. Immediately assess the nature and extent of the breach.
2. Contain and mitigate the impact of the breach.
3. Notify the management within 72 hours if the breach poses a risk to the rights and freedoms of individuals.
4. Inform affected data subjects without undue delay if the breach is likely to result in a high risk to their rights and freedoms.

13. Policy Review

This policy will be reviewed annually by the School's Senior Leadership Team and Data Protection Officer to ensure compliance with legal requirements and best practices. Amendments will be made as necessary to reflect changes in data protection laws or the School's operations.

Signed	Position	Date	Review
F. Carpenter	Co-owner and Joint Principal	01/09/2025	12 Months

A. Carpenter	Co-owner and Joint Principal	01/09/2025	12 Months

This Data Protection and GDPR Policy outlines the Central School of Dancing & Performing Arts' commitment to safeguarding personal data and ensuring transparency in its processing activities.