



Data Protection Policy

Belle Etoile Academy of Dance is registered under the Data Protection Act.

Belle Etoile Academy of Dance is required to process all relevant personal data regarding members of staff, volunteers, applicants, parents and pupils as part of its operation and shall take all reasonable steps to do so in accordance of this policy.

Data Protection Controller

Mrs Carly Jane Louise Jones is registered as Data Controller, Registration Number ZA321759 who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998. The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy. The Academy recognises The General Data Protection Regulation (GDPR) (Regulation (EU)2016/679) adopted 27 April 2016, the two-year transition period and the application date of 25 May 2018 and is actively working towards compliance with that directive.

The Principles

The Academy shall so far as is reasonably practicable comply with the Data Protection Principles contained in the Data Protection Act to ensure all data is:-

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secure
- Not transferred to other countries without adequate protection

Personal Data

Personal data covers both facts and opinions about an individual where that data identifies an individual. For example, it includes information necessary for employment such as the member of staff's name and address and details for payment of salary or a pupil's attendance record and exam results. Personal data may also include sensitive personal data as defined in the Act.

Sensitive Personal Data

The Academy may, from time to time, be required to process sensitive personal data. Sensitive personal data includes data relating to medical information, gender, religion, race, sexual orientation, trade union membership and criminal records and proceedings.

Rights of Access to Information

Data subjects have the right of access to information held by the Academy, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Any data subject wishing to access their personal data should put their request in writing to the DPC. We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within one month for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to our attention and in compliance with the relevant Acts.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following:-

- National security and the prevention or detection of crime
- Information required for tax purposes by the HMRC
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Belle Etoile, including Safeguarding and Child Protection.

The above are examples only of some of the exemptions under the Act.

Accuracy

We will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.

Data Security

Belle Etoile will take appropriate technical and organisational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the Act. Belle Etoile and therefore all staff and pupils are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data. An appropriate level of data security must be deployed for the type of data and the data processing being performed.

Information Held

For administration details we require a parent/guardian to fill out an enrolment form for every pupil attending classes at Belle Etoile Academy of Dance. This information is stored within Dance Biz, Thinksmart Software which is password protected. ThinkSmart Software take all proportional steps to safeguard your data from unauthorised access. All ThinkSmart Software servers are protected by multiple, redundant firewalls and intrusion detection and prevention systems that are regularly monitored and tested. 256-bit Secure Sockets Layer (SSL) data encryption is employed to protect all data access across the internet.

We generate printed registers which include the child's full name, the parent's first name, emergency contact number and information relating to any medical conditions. These are held by the teacher for the duration of the term and then returned to the principal. Attendance records are stored on Dance Biz and paper copies are destroyed.

An email address is required for us to send invoices to and communicate with parents, for example in the event of a change to class times, an update on uniform required or the cancellation of a class. We will occasionally send out a newsletter by email however advertising will be kept to a minimum.

We require at least one contact number in case of emergency. Contact numbers are also used to communicate by text message information or reminders relating to any classes.

Your home address would only be used to send correspondence to in the event of an unpaid invoice when there has not been a response to emails or calls.

Personal information will never be shared with any other companies or organisations without prior consent.

If your child no longer attends classes with us and you would like us to delete your personal details please email carly@belleetoiledance.co.uk.

Policy Written by: Carly Jones, June 2019
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