



## **Policies and Procedures**

### **Document 13 – Privacy Notice for Parents and Carers**

Date of Last Review:

July 2018



<b>Contents</b>	<b>Page No</b>
1) What is Personal Data? .....	4
2) Who we are .....	4
3) What is the legal basis for processing your personal data? .....	4
4) What we use your personal data for? .....	4
5) What kind of information do we hold about you? .....	5-6
6) Who do we share information with? .....	6-10
7) How do we retain your data? .....	10
8) Keeping you updated .....	11
9) MailChimp .....	11
10) Further processing .....	11
11) Security .....	11
12) Your Rights .....	12

## **1) What is Personal Data?**

- i)* Personal data is something that says something about you as an individual, so it would normally include your name, contact details and information relating to any child/children you have enrolled for instrumental/vocal tuition and/or centre membership/central activities with Musica Kirklees. The processing of personal data is governed by the General Data Protection Regulation (GDPR) effective from 25<sup>th</sup> May 2018.

## **2) Who we are**

- i)* Musica Kirklees (the trading name for Kirklees Music School) is committed to protecting and respecting your privacy. This policy, together with any other documents referred to within, sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- ii)* For the purpose of the Data Protection Act 1998 (Act)/EU General Data Protection Regulation 2016 (GDPR), the data controller is Kirklees Music School trading as Musica Kirklees, 9 Beast Market, Huddersfield, HD1 1QF.

## **3) What is the legal basis for processing your personal data?**

- i)* The legal basis for processing your personal data is that it is necessary for the purpose of entering into a contract with you and also because it is in our legitimate interests to process a limited amount of personal information in order to ensure that we provide a safe and efficient service.

## **4) What we use your personal data for?**

- i)* We need to hold and process your personal data in order to:-
- Organise lessons/centre membership and associated payment for the services provided
  - Carry out our business and administration functions in relation to lessons/centre membership
  - Support your child(ren)'s learning
  - Monitor and report your child(ren)'s progress
  - Provide appropriate pastoral care
  - Assess the quality of our service in order to provide you with the best musical education we can

- Inform you of news, events, activities and services running at Musica Kirklees

## 5) What kind of information do we hold about you?

- i)* If you apply for your child(ren) to receive instrumental/vocal music tuition, the information required will be the following details:-
- Name of student
  - Date of birth of student
  - Gender of student
  - Postal address including postcode
  - Current school of student
  - School in September (if known)
  - Does the student appear on the school register for Special Education Needs (SEN) and Disability (SEND)?
  - Any medical conditions that the teacher needs to be aware of?
  - Further details of any SEND/medical details
  - Parent/carer title
  - Parent/carer first name and surname
  - Parent/carer home telephone number
  - Parent/carer mobile telephone number
  - Parent/carer email address
  - If you wish to apply to pay by Direct Debit
  - If you would like to receive SMS notification of when e-invoices are sent
  - Kirklees Priority Passport Number (if applicable)
  - Kirklees Priority Passport Expiry date (if applicable)
  - The instrument that the students wishes to learn
  - Is the student a beginner
  - Your preferred lesson package

- ii)* If you apply for your child/ren to attend a Centre/Central Ensembles, you will be asked to provide the information as above and in addition:-
- the group(s) the student will be attending
  - photo/video permissions for the student
  - permission for the payer to subscribe to gift aid
- iii)* When a pupil commences lessons, the following information will be collected as an ongoing process:-
- data on attendance
  - if the student is transferring to a new school for the following academic year
  - information regarding any music examinations taken (this may include ABRSM practical/theory exams/Trinity College/Rock School etc). Musica Kirklees staff may enter their students directly or via a Musica Kirklees entry
  - approximate grade even if examinations are not actively taken
  - Pupil Premium status (in order for individuals to access funding)

## **6) Who do we share information with?**

Your personal data will be treated as strictly confidential and will only be shared with others if essential for dealing with your child's music tuition/your Musica Kirklees account. This may include the following:-

- i)* Your child(ren)'s school

An Information Sharing Agreement (ISA) needs to be in place with your child's school in order for Musica Kirklees to share this information. Upon the receipt of a signed ISA, we will supply the following information to the school that the student attends:-

- Forename and surname of pupil
- The duration of the lesson
- The instrument the pupil studies
- The year group the student is in
- The day and time that lessons will take place in school. This will be communicated in writing in September and amendments during the rest of the academic year may be communicated verbally by the teacher concerned

*ii)* Pupil Premium (via school)

- Students may be eligible to access Pupil Premium in order to assist with funding Musica Kirklees music tuition. Schools would need to co-ordinate this directly with Musica Kirklees and would need to seek permission from the parent/carer to share their information with Musica Kirklees.
- Once set up, Musica Kirklees will liaise directly with the school regarding students for purposes of invoicing, attendance etc.

*iii)* Your bank (Direct Debit customers only)

If you apply to pay by Direct Debit, we will ask you to provide the following by completing a mandate form. This will then be issued to your bank in order for the Direct Debit to be set up:-

- Name(s) of Account Holder(s)
- Bank/Building Society account number
- Branch Sort Code
- Name and full postal address of your Bank or Building Society
- Your Musica Kirklees payer reference number
- Your signature authorising the Direct Debit instruction

*iv)* Credit/debit card payments

If you make credit/debit card payments online to Musica Kirklees, this information will be processed using Pay360. Their Privacy Policy can be viewed via <https://www.pay360.com/about-us/privacy-policy>. For card payments made by telephone, Musica Kirklees does not save your details anywhere.

*v)* Gift Aid

If a student attends a Centre group or Central Ensemble, you will be asked to complete a Centre Registration Form.

By ticking the Gift Aid box on the Registration Form, Musica Kirklees is able to reclaim tax from HM Revenue & Customs. In order for Musica Kirklees to do this we need to provide HM Revenue & Customs with the following information:-

- Parent/carers name
- House number
- Postcode

vi) Associated Board examinations (ABRSM)

Students may enter an ABRSM examination by:-

- Completing a Musica Kirklees entry form
- The Musica Kirklees Teacher entering them as a 'private entry'
- A Musica Kirklees Teacher (nb this may not necessarily be your son/daughter's teacher) organising a 'special visit' at a venue in Kirklees on behalf of other Musica Kirklees teachers
- The parent/carer entering the student directly to the relevant examining body

Whichever way is adopted, this is completed in conjunction with the Musica Kirklees member of staff. Musica Kirklees staff will be required to disclose the following information to the appropriate examining body in order for the student to be entered:-

- Full name (including any middle names)
- Date of birth
- Gender
- School
- SEN and disabilities (if applicable). Musica Kirklees may have to request supporting documents as proof and share these with ABRSM
- Information regarding the individual applying for the exam to take place (this may be the teacher's personal details)
- Information regarding the address of the organisation
- Contact details of the parent/carer
- Any timetabling requests
- Accompanist's name

ABRSM's Privacy Policy can be accessed via this link

<https://qb.abrsm.org/en/policies/website-privacy-policy/>

In the event of the examination being a 'private entry' submitted by a Musica Kirklees teacher, results will be passed onto Musica Kirklees.

If the entry is directly made through Musica Kirklees, results will be shared with the Musica Kirklees member of staff. Whichever way the candidate is entered for an examination, collecting this information will help with supporting your child(ren)'s learning in the future.



vii) Trinity College examinations

Students may enter Trinity examinations by:-

- The Musica Kirklees Teacher entering them as a 'private entry'
- Completing an entry form which is specifically organised for Musica Kirklees students by Trinity College's representative
- The parent/carer entering the student directly to the relevant examining body

Whichever way is adopted, this is completed in conjunction with the Musica Kirklees member of staff. Musica Kirklees staff will be required to disclose the following information to the appropriate examining body in order for the student to be entered as a 'private entry'. In the event of the Trinity College's representative organising the entry, the following information needs to be provided to the representative:-

- Full name (including any middle names)
- Date of birth
- Gender
- School
- Contact details of the parent/carer (including parent/carer's email address)
- Address including postcode
- Parent/Carer's email address
- SEN and disabilities (if applicable). In this instance the Special Needs Form from the Trinity website requires completion and emailed to the Trinity College's Representative
- Information regarding the individual applying for the exam to take place (this may be the teacher's personal details)
- Information regarding the address of the organisation
- Any timetabling requests
- Accompanist's name

Trinity College's Privacy Policy can be accessed via this link  
<https://www.trinitycollege.com/site/?id=9>

In the event of the examination being a 'private entry' submitted by a Musica Kirklees teacher, results will be passed onto Musica Kirklees. If the entry is directly made through the Trinity representative, the Musica Kirklees teacher will also inform Musica Kirklees of the result. Whichever way the candidate is entered for an examination, collecting this information will help with supporting your child(ren)'s learning in the future. A similar process for Rock School and other formal music examinations will be adopted.

*viii)* Accompanists for ABRSM/Trinity College examinations

If a student requires the services of an accompanist for an examination, his/her teacher may recommend an individual that may not be employed by Musica Kirklees. In this instance, the teacher may pass the accompanist's details on for you to contact to arrange this service.

In advance of you contacting the recommended accompanist, Musica Kirklees may share with the accompanist, the following information:-

- Names of students who should be contacting him/her
- The grade of the examination
- The instrument

*ix)* Music for Youth in the event of Musica Kirklees groups attending National Festival/School Proms

In order to comply with regulations around child performances, attendees of 16 years and under must have authorisation of absence from school from their school's Headteacher. We must therefore seek permission and provide this evidence to Birmingham City Council on request which would only be on the day of the performance:-

- Forename and surname of pupil
- Date of Birth and age
- Name of School
- Type of School
- Attendance Permission (16 years and under only)

**7) How long do we retain your data?**

- i)* We will only use and store the personal information that you provide us with for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

## **8) Keeping you updated**

- i)* The GDPR requires that all members of a mailing list are given the opportunity to be removed from this list. We very much hope your interest in Musica Kirklees information and events conveyed in our newsletters and other promotional material is continued.
- ii)* Musica Kirklees will be inviting you to continue to subscribe to receiving our general newsletters/Musica centre and central ensemble newsletters and general marketing material which you may find of future interest via MailChimp.
- iii)* In line with our legal requirement of maintaining a contract with yourselves, invoices will be sent as normal without the inclusion of a newsletter.

## **9) MailChimp**

- i)* If you do choose to opt-in to newsletters and general marketing material, your email address and name will be held securely by MailChimp and the information will also be made accessible to Musica Kirklees. MailChimp's servers are based in the United States, so your information may be transferred to, stored, or processed in the US MailChimp participates in and has certified its compliance with the EU-US Privacy Shield Framework, which certifies that it has adequate safeguards in place. As a respected email marketing provider MailChimp won't share your information with any unauthorised third parties or contact you directly at any time – you can read their full privacy policy here: <https://mailchimp.com/legal/privacy/>.
- ii)* Musica Kirklees will retain your data in MailChimp for as long as you choose to stay subscribed. You can update your details or opt-out of our emails at any time using the 'Unsubscribe' or 'Email Preferences' links found at the bottom of every email we send via MailChimp. If you unsubscribe MailChimp will retain your email address for the purposes of a suppression list to ensure that no further marketing messages can be sent unless you actively choose to opt-in again.

## **10) Further processing**

- i)* If we wish to use your personal data for a new purpose which is not covered by this Privacy Notice then we will provide you with a new notice explaining this new use prior to commencement of the new purpose.

## **11) Security**

- i)* Musica Kirklees is committed to ensuring your information is secure in order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard the information we collect.

## 12) Your Rights

- i)* Under the GDPR you have the following rights:
- Request access to your personal information
  - Request the correction and in some cases the or deletion of your personal information
  - Request we restrict our use of your information where one or more of the circumstances set out in Article 18(1), GDPR applies
  - Request that wherever possible you be provided with copies of any information be provided in a structured, commonly used digital format
  - Object to the the processing of your information for certain purposes unless there are compelling legitimate grounds which require our processing of your personal information to continue
  - Withdraw your consent to our use of your information where consent constitutes the lawful ground for processing
- ii)* In your request, please make clear what personal information is affected and what changes you would like to make, or let us know what limitations you would like to put on our use of your personal information. A record of any changes, deletions or withdrawals of consent will be recorded solely for the purposes of complying with the GDPR.
- iii)* For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.
- iv)* You may request details of personal information which we hold about you under the GDPR. If you would like a copy of the information held on record please contact Musica Kirklees, 9 Beast Market, Huddersfield, HD1 1QF or e-mail [enquiries@musicakirklees.org](mailto:enquiries@musicakirklees.org). On receipt Musica Kirklees will send you an Access to Personal Data Request form to complete.
- v)* If you believe any information we are holding is incorrect please inform us.
- vi)* Individuals have a right to complain to the ICO (Information Commissioner's Office) if you think there is a problem with the way Musica Kirklees is handling your data. You can contact the Information Commissioners Office on 0303123 1113 or by accessing the following website <https://ico.org.uk>.