

## **Entrust Music Service Staffordshire**

### **Privacy Notice**

V2. 08.05.2018

#### **The categories of personal information that we collect include:**

- Personal information (such as name, date of birth, school, unique pupil number and address)
- Characteristics (such as special educational needs and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Medical Information (such as asthma, allergies etc. and emergency contact details)
- Billing information (such as parent / carer names and address)
- Permissions (such as photography and video permissions)

#### **Why we collect and use this information**

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing and child licensing
- to provide statistical analysis to Arts Council England and the Department for Education

We use parents data:

- to keep children safe in lessons, at rehearsals and at concerts
- to provide information related to the activity the pupil is engaging in
- to invoice for rehearsal fees, where applicable

#### **The lawful basis on which we use this information:**

The data we collect, and use, falls under three lawful categories which are detailed below:

- Most of the data we collect falls under the category of 'legitimate interests'. Under Legitimate interests we use data in ways that people would reasonably expect for the purposes of carrying out our music service activities and where they have a minimal privacy impact.

Article 6(1)(f) gives a lawful basis for processing under 'legitimate interest' where:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data"

- In the case of more sensitive personal data, such as where we collect information related to SEND and / or eligibility for receipt of Pupil Premium funding, for the purposes of statistical reporting to the Department for Education, the lawful basis falls under the category of 'public task'.

Article 6(1)(e) gives a lawful basis for processing where:

"processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"

- Where we are asking for additional information, such as photograph / video permissions or requesting to keep in contact with you about further opportunities, this data falls under 'consent'.

We use 'Consent' to offer people real choice and control over how we use their data and want to build trust and engagement. We offer a genuine choice and require a positive action to opt in to these categories.

### **Statutory or contractual obligation to provide personal data**

Parents must provide medical and contact information when young people join a group or perform in an organised event. This is to ensure the safety of the individuals in the care of the service.

### **Who we share pupil information with**

We routinely share pupil information with:

- Music Service Teachers / Tutors, Ensemble Group Leaders and Music Service Managers
- Schools that the pupil's attend after leaving us, providing they are within Staffordshire
- The Department for Education (DfE), via Arts Council England, in the form of statistical analysis

We do not share information about our pupils with anyone, without consent, unless the law and /or our policies allow us to do so.

We share data trends and statistical analysis with the Department for Education (DfE), via Arts Council England, on an annual basis. No individual pupil or parent data is shared as part of this process.

### **Storing pupil data**

We hold pupil and parent data in line with the 'Retention Guidelines for Schools' provided by the 'Information and Records Management Society'. As we provide a service to pupils from Early Years through to the end of Secondary Education, and many individuals opt in and out of lessons several times during their education, we follow the retention timescales for the Secondary phase.

The retention period is therefore the date of birth of the pupil + 25 years.

Parent data and records are retained in line with the timescales for the corresponding pupil data.

### **The rights available to individuals in respect of the processing:**

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

### **The right to withdraw consent**

To change your consent as previously provided, please use the service contact details below or submit a new and updated Health and Safety Form submission which will update the levels of consent we hold against your record.

### **Complaints or queries**

Entrust Music Service Staffordshire tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address above.

If you want to make a complaint about the way we have processed your personal information, you can contact us using the details above.

### **Access to personal information**

Entrust Music Service Staffordshire tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for any personal information we may hold you need to put the request in writing addressing it to [musicservice@entrust-ed.co.uk](mailto:musicservice@entrust-ed.co.uk) or writing to the address provided above.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

### **Links to other websites**

This privacy notice does not cover the links within our website, linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 28.03.2018

### **Contact**

If you would like to discuss anything in this privacy notice, please use the contact details below:

#### **Name and Contact Details of our organisation and service:**

Entrust Music Service Staffordshire  
Entrust Support Services  
Riverway Centre  
Riverway  
Stafford  
ST16 3TH  
Email: [musicservice@entrust-ed.co.uk](mailto:musicservice@entrust-ed.co.uk)  
Telephone: 0333 300 1900

#### **Name and Contact Details of our Service Representative:**

Head of Service – John Callister – [john.callister@entrust-ed.co.uk](mailto:john.callister@entrust-ed.co.uk)  
Operations Manager – Rebecca Smith – [rebecca.smith@entrust-ed.co.uk](mailto:rebecca.smith@entrust-ed.co.uk)

#### **Contact Details for Entrusts Data Protection Officer:**

Jenny Coombs – [jenny.combs@capita.co.uk](mailto:jenny.combs@capita.co.uk)