



Policy Document

[Privacy Policy - GDPR](#)

Created by: Jamie Read, 24/04/2019
Next review date: 24/04/2019

Scope of this Policy

This privacy policy is designed to bring Read Dance and Theatre College into alignment and compliance with the new GDPR regulations being introduced on May 25th 2018. The policy covers the processing and storage of personal data and regulates the use of this information. It outlines the 7 principles of data protection and also states the rights of the individual whose data is collected.

This policy covers all data handling and processing at Read Dance and Theatre College, including all administrative and admissions functions, as well as marketing, and will be implemented by the Joint Chief Executives and also the Administration and Admissions Manager.

Our Information

All data collected by Read Dance and Theatre College (trading as READ College) is administered by:

Administration and Admissions Manager

READ College

St Bart's Theatre

St Bartholomew's Road

Reading RG1 3QA

0118 9666275 – admin@readcollege.org

All questions and requests pertaining to data collection, handling and GDPR should be directed to the Administration and Admissions Manager on the details above.

The Legal Basis for Data Collection & Handling

Data collected and processed by Read Dance and Theatre College in respect of clients is done so on the legal basis of Legitimate Interest. This means that the college will only collect and/or process data for individuals whom we believe have a mutual and legitimate interest in us doing so. These interests include, but are not limited to:

- ✓ Being involved delivery or management of Performing Arts training
- ✓ Applying to audition at READ College
- ✓ Enrolling on a full- or part-time course at READ College
- ✓ Applying for bursary funding from READ College
- ✓ Becoming a 'Friend of READ College' or engaging in other forms of sponsorship
- ✓ Charitable donations or support for our work
- ✓ Engaging with, or benefitting from, our Outreach Programme
- ✓ Joining our mailing list

Data collected and processed by Read Dance and Theatre College pertaining to its staff, whether employed or freelance, is done so on the basis of compliance with a legal obligation. This means that the data we collect is done so on the basis that we are legally required to do so in order to manage our recruitment processes and safeguard our young people.

How and what Read Dance and Theatre College will collect

The college only collects the data it needs in order to fulfil its responsibilities and conduct its day-to-day business. We will not ask for unnecessary personal data, and usually information required will be limited to your name, contact details, education and/or employment history and date of birth. For students applying for bursary funding, data in reference of household income and finances may

also be required, although this data is returned without being copied or stored immediately after processing.

Data is collected in the form of application and/or contact forms, usually completed online (although printed paper copies are also available on request). Data will not be collected over the telephone and we will never make any unsolicited requests for information.

When an individual completes an application or contact form for Read Dance and Theatre College, it is understood that there is legitimate mutual interest between that individual and the college, which forms the lawful condition for data collection and handling. In the case of staffing, completion of an Application for Employment form and all relevant identification checks fall under the condition of legal obligation.

Special Categories of Data

Read Dance and Theatre College is committed to ensuring the diversity of its student body, and ensuring that the training it provides is open and available for everyone. Therefore, when a student chooses to enrol on a course at the college (and only at that time, never as part of the application process) the college may request information on the ethnicity of the student. Such information is classed as a Special Category under the GDPR.

It is optional for students enrolling on courses to complete this information, and no student should feel obliged to complete this section of the enrolment form. However, collecting this data better allows us to monitor, maintain and improve the diversity of our student body, as a part of our commitment to equal opportunities.

Processing and Storage of Data

Data processing at Read Dance and Theatre College is limited to the minimum necessary in order to carry out our day to day activities, such as: enrolling students into training; recording sales and purchases from our customers and suppliers; calculating bursary support levels, and; employing and managing staff.

All data handled and processed by the college is securely stored, and we take our commitment to data protection very seriously. No unnecessary data is collected or stored, and wherever possible data is stored in a secure cloud database with several levels of security. No data is stored on individual computers, to lessen the likelihood of loss or theft of data.

Where data is stored in paper form, it is filed in a locked secure filing system which itself is kept locked in a secure office.

For both digital and paper data storage, only 3 people on the management team have access to the filing systems. No access, whether temporary or permanent, is given to other staff members at any time.

Purpose Limitation

Data collected by Read Dance and Theatre College is only for specific purposes, and will not be shared. Purposes may include: enrolment on a course at READ; employment; communication regarding charity and fundraising events; sales or purchases with our customers and suppliers.

Data will never be used for any purpose other than that for which it was originally collected. Should we intend to change the usage of your data, then this policy will be updated appropriately and all individuals whose data is affected will be notified immediately.

Data Minimisation

Read Dance and Theatre College confirms in this policy that the data we handle, process and store is limited at all times that that which is necessary. We will never collect information that is not strictly necessary for us to carry out our day-to-day operations.

Data Accuracy

As part of our compliance with GDPR, Read Dance and Theatre College confirms that we will make every effort to ensure that the personal data we handle, process and store is accurate. Where we are notified of any inaccuracies, these will be dealt with immediately and records will be amended as appropriate. We will never store any personal data that we know to be inaccurate.

Timescale

We will keep your data for a maximum of 7 years, however it will not be processed any further once all essential work has been done. For example, a new student's data will be processed during their application and enrolment period, but will then be archived once that work has been completed.

It is necessary for us to keep student examination records for up to 5 years, and accounts records for up to 7 years, which is why Read Dance and Theatre College have set the upper limit at this level.

Integrity and Confidentiality

Your data will be stored securely at all times, and will not be accessed or accessible by anyone other than designated data handlers within the organisation.

Your rights

As an individual whose data we may collect, process and store, you have the following rights under GDPR law:

1. The right to be informed – we will provide you with fair and transparent information regarding the handling, processing and storage of your personal data.
2. Right of access – we will provide you with access to the personal data the we have for you upon request.
3. Right to rectification – you have the right to ensure that your personal data is accurate, and we will correct any mistakes upon request.
4. Right to object – you have the right to us handling, processing and storing your data.
5. Right to restrict processing – you may request that we do not process your data any further. This does not stop us from storing the data that we have about you, but does prevent us from processing it any further.
6. Right to erasure – you have the right to request us to erase your data. Should you choose to do so, Read Dance and Theatre College must also consider if this would have a detrimental effect on the operations of the college or the conduct of our day to day work. This right is not absolute, but all requests will be properly considered.
7. Rights on automated decision making and profiling – you have the right not to be subject to a decision made in an automated way, where the effect on you is significant or has legal

ramifications. This is a legal right under GDPR law, but at the present time Read Dance and Theatre College does not use, or intend to use, any automated decision making processes in any case.

8. Right to portability – you can request that your personal data be passed on to another organisation at any time.

The Information Commissioners Office (ICO)

Read Dance and Theatre College is a not-for-profit organisation, and as such is exempt from registration with the ICO.

Data Breach Notification

Where your personal data is lost, altered, or is accessed by or disclosed to an unauthorised party, this will be notified to the ICO and to you as the individual concerned. Reporting of this nature will be undertaken within 72 hours of the discovery of a data breach being made.

For Further Information and Contact

For further information of GDPR and/or the ICO, please visit the ICO website. To discuss this privacy policy or to make any requests regarding your data, please contact Administration and Admissions at Read Dance and Theatre College on admin@readcollege.org or telephone 0118 9666275.