



## Glow Visual & Performing Arts

### Data Protection Policy

At **GLOW** we respect the privacy of the children attending the Club and the privacy of their parents or carers, as well as the privacy of our subcontractors and those that visit our website and social media pages. Our aim is to ensure that all those using and working with **GLOW** can do so with confidence that their personal data is being kept secure. We understand that you want to know how information about you is used, stored and shared. We understand the importance of protecting your personal information. We will never sell your personal information to anyone.

Our lead person for data protection is **Gloria Lowe**. The lead person ensures that the Club meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

#### Confidentiality

Within the Club we respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to Club staff about their child will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our **Safeguarding Policy**).
- Concerns or evidence relating to a child's safety, will be kept in a confidential file and will not be shared within the Club.
- Glow's subcontractors only discuss individual children for purposes of planning and group management.
- Glow's subcontractors are made aware of the importance of confidentiality during their induction process.
- Issues relating to Glow Team Leaders, whether paid or voluntary, will remain confidential to those making personnel decisions.
- All personal data is stored securely in a lockable file and on a password protected computer.
- Students on work placements and volunteers are informed of our Data Protection policy and are required to respect it.

#### How information about you is used, stored and shared

**Children and parents:** We hold only the information necessary to provide our services for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parents or school. Our legal condition for processing any health-related information about a child is so that we can provide appropriate care to the child. Once a child leaves our club we retain only the data required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

We will use the contact details you give us to contact you via **phone and email** so that we can send you information about your child, our Club and other relevant news, and so that we can communicate with you regarding payment of our fees.

We will only share personal information about you or your child with another organisation if we:

- have a safeguarding concern about your child

- are required to by government bodies or law enforcement agencies
- engage a supplier to process data on our behalf (e.g. to take online bookings, or to issue invoices)
- have obtained your prior permission

You have the right to ask to see the data that we have about yourself or your child, and to ask for any errors to be corrected. We will respond to all such requests within one month. You can also ask for the data to be deleted, but note that:

- we will not be able to continue to care for your child if we do not have sufficient information about them
- even after your child has left our care, we have a statutory duty to retain some types of data for specific periods of time\* so can't delete everything immediately.

**Subcontractors:** The personal information that we collect about you is used only to manage your work with us. Our lawful basis for processing your personal information is to fulfil our legal obligations as a childcare provider.

Any information that you provide to us is kept secure whilst you work with us.

We will use the contact details you give us to contact you via **phone, email and social media** so that we can send you information about your work, the Club and other relevant news.

We will only share personal information about you with another organisation if we:

- have a safeguarding concern that relates to you; or
- are required to by government bodies or law enforcement agencies; or
- engage a supplier to process data on our behalf (eg to process invoices).
- have obtained your prior permission.

You have the right to ask to see the data that we have about yourself, and to ask for any errors to be corrected. We will respond to all such requests within one month. You can also ask for the data to be deleted, but note that

- we will not be able to continue to subcontract work to you if we do not have sufficient information about you

### **Sharing information with third parties**

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g. Police, HMRC, etc). If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

### **Subject access requests**

- Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.
- Subcontractors can ask to see any information that we keep about them.
- We will make the requested information available as soon as practicable, and will respond to the request within one month at the latest.
- If our information is found to be incorrect or out of date, we will update it promptly.
- Parents /carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care we have to keep some data for specific periods so won't be able to delete all data immediately.
- Subcontractors can ask us to delete their data, but this may mean that we can no longer employ them as we have a legal obligation to keep certain data. In addition, even after a subcontractor has left we have to keep some data for specific periods so won't be able to delete all data immediately.

## Personal information & communication with customers

Customers share personal information with us when they sign up to our newsletter on our website or at an event, when they visit or post a comment on one of our social media pages and when they contact us directly.

### Glow uses the personal information that customers provide to:

- keep them up to date on events/workshops that might be of interest to
- for marketing or advertising purposes/to inform customers about promotional offers
- respond to customer enquiries
- present our website and its contents to customers/to tell customers about changes to the GLOW Website
- let customers know about products or services

### Legitimate Interest

We consider our Newsletters to fall under the criteria of “legitimate interest” where upon the customer chooses to sign up to receive free content. Occasionally, offers will be sent via email, however there is zero obligation of purchase. Customers may opt out of receiving any, or all, of these communications from us by following the unsubscribe link in any of our emails.

### Changes to this Privacy Policy

This Privacy Policy is subject to change at the sole discretion of Glow Visual & Performing Arts, and the updated Privacy Policy will be posted on our Website. This Privacy Policy was last updated as of the date provided below. Continued use of the Website after Glow posts a revised Privacy Policy signifies your acceptance of the revised Privacy Policy. Please check back frequently and review the Privacy Policy for any updated terms or changes.

### Contact Us

If you have any questions or comments regarding this Privacy Policy, please do not hesitate to contact us: [gloria@glowclub.co.uk](mailto:gloria@glowclub.co.uk)

### How you can make a complaint


I am required to inform you about how you can make a complaint relating to a data-breach or if you think I am not processing your data appropriately.

Complaining to ICO – [ico.org.uk](http://ico.org.uk)

### GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.

*\* We do need to retain certain types of data (such as records of complaints, accidents, and attendance) for set periods of time after your child ceases to be in our care, but we delete as much personal data as we can as soon as possible.*

This policy was adopted by: <b>Glow Visual &amp; Performing Arts</b>	Date: 24/05/18
To be reviewed: <b>May 2020</b>	Signed: 

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017): Safeguarding and Welfare Requirements: Information and records [3.68 -3.71]*.