

MusicWorks (Chamber Courses) Data Protection Policy

1 Background

In order to operate, MusicWorks needs to collect, store and use information about the individuals that are involved in the courses it runs, those it invites to its fundraising events and those who are its Members or Trustees.

This Data Protection Policy explains how data should be collected, stored and used in order to comply with MusicWorks' data protection standards and the General Data Protection Regulations (Regulation (EU) 2016/679). It was approved by the Trustees on 23 May 2018 and will be reviewed annually.

This Policy applies to everyone who has access to personal information that MusicWorks possesses and all such persons must ensure that they follow this Policy..

MusicWorks is the Data Controller for the purposes of the Regulations and the Data Protection Officer is Catherine Manson. They, together with the Trustees of MusicWorks, are responsible for the secure, fair and transparent collection, use and retention of data. Any questions relating to this Policy should be directed to the Data Protection Officer at MusicWorksinfo@googlemail.com.

2 Principles relating to processing of personal information

Personal data will be:

- processed lawfully, fairly and in a manner that is transparent to the individual to whom it relates
- only collected where necessary for, and only used for, specified, explicit and legitimate purposes, namely the effective running of MusicWorks courses
- accurate and kept up to date
- only kept for as long as is necessary for the purposes for which it is collected unless retention is necessary for legal purposes
- kept and only processed in a secure manner, password protected where in electronic form and otherwise in a locked environment.

3 Personal information that will be collected

3.1 *In relation to those attending courses as students*

We will collect information about those applying to attend courses that is necessary for us to process their application and assess their abilities. This will include:

- contact details for them and their parents or guardians
- date of birth of the applicant
- information about their musical experience and
- audition material supplied by them.

For those we accept on a course, we collect additional information that is necessary for us to organise the course and to ensure that their health and other personal needs are met during the course. This information includes:

- any special dietary requirements
- details of any health conditions we should know about
- contact details for their parent/guardian (day and night), doctor and NHS or other medical number
- details of known allergies
- date of last tetanus inoculation

The above information will be provided by the individual concerned or, where applicable, their parent or guardian and the consent of the individual and, where applicable, the parent or guardian to the processing of the information by MusicWorks will be obtained.

3.2 *In relation to those attending courses as teachers or helpers*

- contact details
- Disclosure and Barring Service certificates
- details of any contractual or financial relationship between the individual and MusicWorks
- details necessary to make payments to them

The above information will be provided by the individual concerned, whose consent to the processing of the information by MusicWorks will be obtained.

3.3 *In relation to those we invite to fundraising events*

- contact details
- details of any donations made
- information necessary for collection of Gift Aid

MusicWorks will collect and process the above information on the basis that it has a legitimate interest in doing so, to obtain funding for its charitable purposes.

3.4 *Trustees and Members*

Contact details and such other information as is a necessary result of their role in relation to MusicWorks. MusicWorks will collect and process this information on the basis that it has a legitimate interest in doing so.

4 Transmission of information

MusicWorks will not sell or give any personal information to anyone who is not employed by, or a Member or Trustee of, MusicWorks or unless it is necessary to do so in order to comply with its legal obligations.

MusicWorks will not transfer data to countries outside the European Economic Area unless the country has adequate protection for the individual's data privacy rights (although it may send information about an individual to that individual in such other countries).

5 Retention of information

MusicWorks will retain information:

- that relates to any medical intervention that is given to an individual whilst in its care, for as long as it may be necessary to produce such information to demonstrate that it has discharged its duties
- that otherwise relates to an individual attending its courses as a student, for as long as that individual may be eligible to attend further MusicWorks courses, to avoid the need for resubmission of information
- that relates to teachers and staff attending courses and its Members and Trustees, for as long as it may be necessary to demonstrate that it has discharged its legal duties.

6 Rights of the individual

Individuals have rights over the information that MusicWorks holds about them. MusicWorks will ensure that it complies with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights. The rights are as follows:

- *Right to be informed:* When MusicWorks collects information from an individual, it will provide a copy of this Data Protection Policy..
- *Right of access:* Individuals can request to see information that MusicWorks holds about them, and ask for confirmation as to how it is being used, by contacting the Data Protection Officer. Such requests will be dealt with within one month of receipt and no charge will be made.
- *Right to rectification:* Individuals can request that their information be updated or corrected and such requests will be processed within one month after receipt.
- *Right to object:* Individuals can object to their data being used for a particular purpose and MusicWorks will comply with such requests unless it has a lawful reason to use the data for legitimate interests.
- *Right to erasure:* Individuals can request that the information held concerning them be deleted. MusicWorks data retention policy ensures that data is not held for longer than is reasonably necessary in relation to the purpose for which it was originally collected. MusicWorks will comply with request for deletion unless:
 - there is a lawful reason to keep and use the data for legitimate interests or
 - there is a legal requirement to retain the data.
- *Right to restrict processing:* Individuals can also request that their data be restricted, that is, retained and stored but not used further.
- *Right to portability:* MusicWorks will ensure that the information is portable, for the purposes of the Regulation and is not subject to any form of automated decision making (including profiling).
- *Right to complain:* Individuals have a right to complain if they consider that MusicWorks has not complied with its data protection obligations. Such complaints should be made to the Information Commissioner's Office.

7 Cookies

MusicWorks does not use cookies or other automated information collection devices on its website or elsewhere.

8 Third party processors

MusicWorks uses Google Docs to process data on its behalf. MusicWorks will only use Data Processors who have confirmed that they are compliant with the Regulation.

Approved by Trustees on 23 May 2018