



EXCELLENCE BY THE HOUR

PRIVACY NOTICE

At Arts People we are passionate about promoting excellence and opportunity through arts education. We work with children, arts professionals, (who act as tutors), with schools and with parents. To do this, we need to hold information on individuals. Arts People is committed to:

- using data lawfully
- using data only in a fair and reasonable way
- minimising the collection of, and protecting, personal information
- being transparent about what information we hold about each person with whom we work.

We will always respond promptly to requests to access, correct or erase data. (See below).

This privacy notice is intended for parents, schools, and tutors. It reassures you of our intentions and practices and explains how they are legal, reasonable, and responsible. It explains what information Arts People will collect and how we will use and store it. If it prompts or leaves any questions or concerns, please contact us as set out below.

Arts People is the 'data controller' for the purposes of data protection law.

Why Arts People holds data

Arts People will hold personal information on one of two bases:

1. **Contractual.** We enter into contracts with our tutors and our schools. We will hold the minimum information we need to meet our obligations under the contracts.
2. **Legitimate interests.** Where we have agreed with individuals to provide a service, then we will hold the minimum information we need to do that. We will also hold contact information only on those who have indicated by their actions that they wish to find out more about our services.

These are two of the six 'lawful bases' to hold personal information under Article 6 of the EU General Data Protection Regulations

The personal data we hold

Parents and children

For school-based tutoring, it will only be necessary for Arts People tutors to hold the following information:

- Pupil name

- Arts People lesson attendance for each pupil, which may be shared with the school and parents
- Any special needs notified by the school
- Progress in the lessons, which will be shared with the school and with parents

Arts People will not hold this information centrally. It will reside only in the tutor's file, which will be stored securely in school and will not leave the premises.

For directly organised tuition, tutors will hold the same information, in the same way, but the files will need to be kept at the tutor's house between sessions. Again, Arts People will not need to keep this information centrally. For these lessons, Arts People will ask for a contact email and/or phone number for each pupil. These will be used to:

- Warn of session cancellations and upcoming changes to services
- Permit surveys about provision quality
- Let pupils and parents know of new opportunities we believe may be of interest to them.

We will only keep data until the end of the academic year following the year in which lessons took place.

Tutors

We will keep the following information on our tutors:

- Safer recruitment information
- Contact details: email, phone number, home address
- Bank details for payment purposes

This information ensures children are kept safe, we employ the right people and that our responsibilities towards them are discharged.

Schools

We will keep the following information on schools:

- The personal email of anybody we will need to contact for the purposes of discharging a contract and/or providing agreed services and being paid so to do.
- For two further academic years, the work emails of individuals at schools that have expressed an interest in, or purchased, our services. This is to permit contact as expected.

Marketing

We will assume, unless told otherwise, that those who have enquired about, or bought, services from us, would appreciate being told about upcoming opportunities. We will, remove contact information from our records at the end of the second academic year following the year in which enquiries were made, or lessons purchased. We recognise the absolute right to erasure of this information. (See below)

Use and central storage of data

Personal information will not be used for any purpose other than that outlined above and will not be shared with any other party, save as above, or for requests by law enforcement and child protection agencies and authorities and only then in accord with the provisions of the law.

If Arts People stores data centrally, it will do so securely. Paper files will be in a locked filing cabinet, with the only access possible by the Arts People Directors. All electronic data will be password protected and available only to the Directors. Any personal information covered in this policy that is transferred between directors will be done so in encrypted form.

We will only retain personal information as follows:

School contacts: for two years after an expression of interest or a contract ends. Details will then be deleted.

Tutor details: for three months after the leaving of our approved list. They will then be destroyed and/or deleted.

Pupils and parents: for a maximum of one month after notice that we will no longer be teaching a pupil. Records will be passed to the school, in the case of school contracts, or destroyed in other cases.

Photography and image recording

We will want, from time to time, to make a record of our lessons and/or concerts. Where we do this in a school, we will ensure that the school has given us permission, that pupils are comfortable being recorded and that the relevant permissions from parents are in place. We will share all images with the school.

If we make images of pupils in our own classes, we will only do so with written permission from parents and where the pupils are happy for us to proceed. We will share images with the relevant parents.

No image of a child will be published with a name that identifies the image.

Rights regarding personal information

Individuals have rights regarding the data that Arts People holds on them.

1. The right of access

Individuals have a legal right to make a subject access request (SAR) to gain access to personal information that Arts People holds about them. Parents also have the right to make a SAR with respect to any personal data Arts People holds about their children.

If an SAR is made, and if Arts People does hold information about the individual or her/his child, the company will:

- provide a description of the data held
- explain why Arts People is holding and processing it, and how long it will be retained
- demonstrate where Arts People obtained it
- detail who it has been, or will be, shared with
- confirm whether any automated decision-making is being applied to the data, and any consequences of this (Arts People has no current plans to do this)
- provide a copy of this information above in a clear and intelligible form

In certain circumstances, individuals also have the right for their personal information to be transmitted electronically to another organisation.

If you would like to make a SAR, please write to Arts People at the address below.

2. The rights to rectification, object and restriction of processing

There is a right, in certain circumstances, for individuals to have inaccurate personal data corrected or completed if it is incomplete. They can also object to the use of personal data if it would cause, or is causing, damage or distress and can ask for the use of the data to be restricted.

An individual can make a request for rectification verbally or in writing. Again, if you would like to do so, please contact Arts People as below.

3. The right to compensation

If Arts People were to breach data protection regulations and an individual suffered as result, s/he would be able to seek damages.

4. The right to transfer data (data portability)

Arts People only collects information from tutors and parents via paper forms, thus this right does not apply.

5. The right to erasure

Arts People is clear that we will destroy and/or delete all data we are no longer using; we also recognise that individuals have, in many circumstances, the right for their data to be erased. We will always respond to such requests.

Complaints and further information

Arts People takes any complaints about the collection and use of personal information very seriously. If you think that the collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about data processing, please contact us immediately. Please also contact us if you have any questions about any aspect of this privacy policy.

Arts People:

- Email : info@artspeople.co.uk
- Phone: 07885219520
- Write: Piece Mill, 27 Horton Street, Halifax, HX1 1QE

You also have the right to contact The Information Commissioner's Office:

- Web: <https://ico.org.uk/concerns/>

- Phone: 0303 123 1113

- Write: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5A.

Policy Review

By: Richard Hughes, Director

Date: 30/04/21

Next Review Due: 30/04/22