

## PRIVACY STATEMENT

May 2018 - next review date May 2019.

### **TBMH Activities, Tuition and Events for Children and Young People**

#### **Purpose**

This privacy statement is intended for applicants, participants, students and their parents, guardians or carers of TBMH activities, tuition and events for children and young people [1]

#### **The lawful basis for obtaining and using personal data**

TBMH needs data in order to fulfil its contractual obligations with applicants, participants and students (or their parents or legal guardians or carers) in order to provide them with the education which they or their children have applied.

Parents or guardians with children under the age of 13 will act on behalf of their children. Children over 13 years of age are deemed competent to understand this privacy statement.

Article 6 of the EU GDPR Regulations concerns the “Lawfulness of Processing” and the following definitions provide the TBMH’s legal bases for processing data:

6(1)(a) a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

6(1)(b) – processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

6(1)(c) – processing is necessary for compliance with a legal obligation

6(1)(d) processing is necessary in order to protect the vital interests of the data subject or of another natural person

#### **Where did your data come from?**

TBMH will use the information you provided in the application or registration form and may supplement this with information provided following an initial application.

#### **Why do we need your data?**

- To manage the application and audition process.
- To manage offer-holders’ transition from applicants to students.
- To manage students’ registration, participation in, and progression through the TBMH children & young people activities, tuition and events.
- To meet our legal obligations relating to child protection and safeguarding.

#### **What we do with your data**

We store your data on secure administrative systems all of which are password protected and access restricted to those TBMH staff who need it.

We will use your data to schedule your activities, taking into account any special requirements or needs you may have told us about.

We will use your data as the basis for your student record, should we offer you an opportunity to participate in TBMH activities, tuition and events.

We will use your data to communicate with you information about relevant events offered by TBMH, where you have given the necessary permission in writing, electronically or verbally.

TBMH's activities, tuition and events for children and young people do not use any automated processes to make decisions about individuals.

### **When we share your data**

When TBMH students wish TBMH to enter them for an ABRSM exam, TBMH will provide some personal details (name, age etc.) to the ABRSM.

TBMH may participate in the Department for Education's Music and Dance Scheme and as part of the administration of this Scheme the DfE may ask for copies of students' reports, which will include students' names.

TBMH may use your name and details of your performance biography in concert programmes or promotional materials for any performance projects in which you are involved.

We may also use images of you in promoting TBMH. Your image may be used in video recordings TBMH makes of its performances and events which are subsequently broadcast and made available for streaming. You were given the opportunity to agree (or otherwise) to TBMH using students' or participants' images as described above when you agreed to the terms and conditions in the TBMH's registration form or indicated the appropriate choice on the registration form as appropriate.

TBMH may provide a debt collection agency with personal contact details of any student or parent/guardian of a student who has significant outstanding debts to TBMH. Personal data will be provided to TBMH's debt collection agency in cases where TBMH has exhausted its own procedures for pursuing a debt.

Other than where noted, the legal basis for sharing data is where processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

TBMH has particular responsibility for safeguarding the well-being of its students and has in place a Safeguarding Children policy. On occasions when TBMH has cause to investigate an incident of suspected abuse, it may be necessary to involve external agencies such as the student's school, social services or the police which will include providing the name of the student concerned.

The legal basis for sharing data with these external organisations is where processing is necessary to protect the vital interests of a data subject (student) or another person.

[1] For the purposes of this Privacy Statement, references to TBMH programmes should be understood to include all activities, tuition and events arranged by and involving TBMH.