

Tewkesbury Abbey Schola Cantorum

PRIVACY NOTICE

For the purposes of Data Protection legislation the Data Controller is deemed to be Tewkesbury Abbey Schola Cantorum of Dean Close Prep School (Schola Cantorum)

The registered address for Tewkesbury Abbey Schola Cantorum:-

Tewkesbury Abbey Schola Cantorum
c/o Dean Close Preparatory School
Lansdown Road
Cheltenham
Gloucestershire
GL51 6QS

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the Schola Cantorum will use (or "process") personal data about individual members or supporters of the Schola Cantorum.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Members or supporters are all encouraged to read this Privacy Notice and understand the Schola Cantorum's obligations.

This **Privacy Notice** applies alongside any other information that the Schola Cantorum may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the Schola Cantorum's other relevant terms and conditions and policies, including:

- any contract between the Schola Cantorum and its members or supporters;
- the Safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and

Anyone who works for, or acts on behalf of, the Schola Cantorum (including staff, volunteers, governors of DCPS and service providers) should also be aware of and comply with the data protection policy, which also provides further information about how personal data about those individuals will be used.

WHY THE SCHOLA CANTORUM NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to members or supporters, The Schola Cantorum needs to process a wide range of personal data about individuals (including current, past and prospective members or supporters) as part of its daily operation.

Some of this activity the Schola Cantorum will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its members or supporters.

Other uses of personal data will be made in accordance with the Schola Cantorum's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The Schola Cantorum expects that for current and past pupils and Staff of a Dean Close Foundation School the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- To provide music performances at Tewkesbury Abbey and other venues
- Maintaining relationships with past members or supporters and the Schola Cantorum community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis
- To enable relevant authorities to monitor the Schola Cantorum's performance and to intervene or assist with incidents as appropriate;
- To safeguard members or supporters welfare and provide appropriate pastoral care;
- To make use of photographic images of members or supporters in the Schola Cantorum's publications, or on the Schola Cantorum's website and (where appropriate) on the Schola Cantorum social media channels.
- Where otherwise reasonably necessary for the Schola Cantorum's purposes, including to obtain appropriate professional advice and insurance.

For members and supporters who are not past or present pupils or members of a Dean Close Foundation School specific consent will be sought for the handling of personal data.

In addition, the Schola Cantorum will on occasion need to process special category personal data for members (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard members or supporters welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of trips who need to be made aware of dietary or medical needs;
- To provide spiritual education in the context of any religious beliefs;

- As part of any Schola Cantorum or external complaints, disciplinary or investigation process that involves such data.
- For legal and regulatory purposes (for example child protection and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOLA CANTORUM

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- where appropriate, information about individuals' health and welfare;
- correspondence with and concerning members or supporters past and present; and
- images of supporters and members (and occasionally other individuals) engaging in Choral activities.

HOW THE SCHOLA CANTORUM COLLECTS DATA

Generally, the Schola Cantorum receive personal data from individuals (including, in the case of members from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOLA CANTORUM SHARES IT WITH

Occasionally the Schola Cantorum will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies
- Venue, Transport and Event organisers

For the most part, personal data collected by the Schola Cantorum will remain within the organisation and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

Members or supporters are reminded that the Schola Cantorum are under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police.

HOW LONG WE KEEP PERSONAL DATA

The Schola Cantorum will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Certain personal data contained within

individual setting's registers or publications, for example labelled photographs, production or music programmes, or individual work may be retained within the Archives for historical purposes.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Director of the Choir. However, please bear in mind that the Schola Cantorum will occasionally have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH

The Schola Cantorum will use the contact details of members or supporters to keep them updated about the activities of the Schola Cantorum, unless the relevant individual objects.

YOUR RIGHTS

- Rights of access, etc.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Schola Cantorum, and in some cases ask for it to be erased or amended or have it transferred to others, or for the Schola Cantorum to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Director of the Choir.

The Schola Cantorum will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The Schola Cantorum will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, The Schola Cantorum may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the Schola Cantorum, or documents prepared in connection with a legal action).

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Consent

In the very specific circumstances where the Schola Cantorum is relying on consent as a means to process personal data, any person may withdraw this consent at any time.

Please be aware however that the Schola Cantorum may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

Indeed as previously mentioned the vast majority of the Schola Cantorum's processing activity is undertaken using legitimate interest as the legal basis.

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates.

In general, the Schola Cantorum will assume that members consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the members activities, progress and behaviour, and in the interests of the members welfare. That is unless, in the Schola Cantorum's opinion, there is a good reason to do otherwise.

However, where a member seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the Schola Cantorum may be under an obligation to maintain confidentiality unless, in the Schola Cantorum's opinion, there is a good reason to do otherwise; for example where the Schola Cantorum believes disclosure will be in the best interests of the member or other members, or if required by law.

DATA ACCURACY AND SECURITY

The Schola Cantorum will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Director of the Choir of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the Schola Cantorum may need to process your data, and who you may contact if you disagree.

The Schola Cantorum will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to the Schola Cantorum systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The Schola Cantorum or The Dean Close Foundation will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. In any event the latest version will be on our web site.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Director of the Choir.

The Director can be contacted on telephone number 01242 258000.

You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Schola Cantorum before involving the regulator.

[24/05/2018]