



Data Protection Policy



Data Protection Policy

Student Teaching collects and uses personal information about pupils, parents and other individuals who come into contact with the organisation. This information is gathered so that we can communicate with parents and staff within schools to provide the best teaching service possible. In addition, there may be a legal requirement to collect and use information to ensure that our organisation complies with its statutory obligations. This policy also covers confidentiality, most relevantly with regards to Safeguarding Children. These points are developed further in our Safeguarding Policy.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with GDPR and other related legislation. Moreover, it is designed to protect the clients and staff of Student Teaching, including parents, pupils, teachers and school staff. It will apply to all physical and digital files regardless of the way it is collected, used, recorded, stored and destroyed. This policy applies to all staff involved with the collection, processing and disclosure of personal data, and everyone within our organisation will be aware of their duties and responsibilities by adhering to these guidelines.

Definitions

A **data controller** is someone who decides how personal data is collected, and how it is processed.

A **data processor** is someone who processes data under the instructions of the data controller.

The data controller of Student Teaching will determine which contact details are necessary to collect to identify pupils and contact parents for necessary business functions – scheduling lessons, sending bills, and updating parents on their child’s progress.

The data processor enters contact information from paper into a digital database to organise it more efficiently, create registers and timetables for teachers and schools, and contact parents with billing and timetabling information.

Data Protection Principles

The GDPR sets out seven key principles, which Student Teaching will adhere to at all times. Personal data will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- The controller shall be responsible for, and be able to demonstrate compliance with, all of the above.

General Statement

Student Teaching is committed to maintaining the above principles at all times. We will comply with both the law and good practice by:

- Informing individuals why the information is being collected when it is collected
- Informing individuals when their information is shared, and why and with whom it was shared
- Checking the quality and the accuracy of the information we hold
- Ensuring that information is not retained for longer than is necessary
- Ensuring that when obsolete information is destroyed that it is done so appropriately and securely
- Ensuring that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Sharing information with others only when it is legally appropriate to do so
- Setting out procedures to ensure compliance with the duty to respond to requests for access to personal information
- Ensuring our staff are aware of and understand our policies and procedures

Nature and Disclosure of Typical Information

Below are the various types of data our organisation will collect, how it will be used and restrictions upon who it will be shared with.

Personal data of parents/carer:

- Name of parent/carer: we need to know who to contact for lesson updates, who is responsible for financing the lessons, and ensuring the child brings their instrument if necessary.
- Email address: this is our primary means of communication. Emails may be sent via third party organisations like MailChimp for necessary business functions, including timetabling lessons, providing feedback on progress and billing.
- Phone number: when the data controller deems that a phone call would settle a matter more quickly than an email conversation would, we may call.

Personal data of pupils:

- **Pupil Names and Class:** these are used to identify pupils and collect them from their lessons.
- **Attainment records:** our teachers take notes on pupil attainment to track their progress. Access to this information is limited to relevant members of staff at school for the benefit of the pupil's education and for the continuing professional development of our teachers. We will also share important updates with parents via email or phone.
- **Audio recordings of lessons:** selected lessons will be recorded for quality control and continuing professional development of our staff. Access is limited to certain members of the Sheffield Music Hub, staff at school and members of Student Teaching, purely for the purpose of evaluating and reviewing teaching strategies. We will always let parents and pupils know if the pupil is being recorded. Parents have the right to request a copy of this audio recording, or request that it is deleted.
- **Personal data of teachers:** this is likely to include contact information and bank details for paying wages. This will not be shared with anyone outside of our organisation, nor anybody within the organisation who does not personally deal with administration or finance.

Optional Data Processing

- Before sending out direct marketing emails we will seek explicit consent for recipients to be contacted.
- We sometimes take photos and videos of lessons or performances for promotional purposes, or of scripts created by pupils as educational projects. Before publishing any digital or printed media, we will always ask for the written consent of parents and schools, and the verbal consent of the pupil. The media will be distributed to parents and the school digitally at least a week before publication; parents, schools and pupils involved have the right to ask for a particular child's omission from the photos.

Confidentiality Policy

Confidentiality applies to information which doesn't legally qualify as 'data'. This includes:

- Information about our organisation
- Information about schools

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- Information about the Sheffield Music Hub
- Information which is not recorded, either on paper or electronically

It is the responsibility of the data controller to ensure that access to all of the information above is limited to the appropriate parties on a “need to know” basis. These are limited to:

- Members of staff at the relevant pupil's school
- Members of the Sheffield Music Hub
- Teachers
- Social and emergency services when necessary

This will be decided by the data controller on a case-by-case basis. The following considerations will be taken into account:

- Is it absolutely vital that the information is shared with this particular person?
- Does sharing the information pose a risk to any children or adults?
- Would sharing the information breach any laws?
- Is our organisation following our own Data Protection Policy?
- Does every party involved know or need to know that their information is being passed on?
- Is sharing the information likely to cause emotional distress to anybody?
- Are there any other circumstantial considerations to make?

Confidentiality and Safeguarding Children

Our Child Protection and Safeguarding Policy specifies the procedures put in place for reporting any concerns about a child's safety. Children must be made aware that in such circumstances; teachers cannot guarantee complete secrecy. All issues will be reported to the data controller, who will then decide the course of action to take. This may include contacting the school's Safeguarding Officer, providing informal verbal or formal written reports. The decision about whether to share this information with the pupil's parents will be discussed.

Staff of Student Teaching must be aware of the risks of reckless disclosure of sensitive issues involved in Safeguarding Children: it may pose a physical threat to the child or emotional distress.

The procedures outlined in our Child Protection and Safeguarding Policy must be followed without deviation, and information will be shared only with the specified parties.

Communication with Clients and Staff

The data controller takes responsibility for ensuring all clients and staff are aware of how their information will be used and who it may be shared with, and records of their confirmed understanding will be kept for our organisation's legal protection:

- All staff will be required to sign a short statement indicating that they have been made aware of their confidentiality responsibilities and will adhere our Data Protection Policy.
- All parents will be given a privacy notice, and will be required to sign a privacy statement.

Security

Student Teaching has identified the following risks regarding the security of the information we hold:

- Information passing between our organisation and parents could go astray or be misdirected. Pupils will be responsible for facilitating parts of the communication, including taking letters home and returning the replies. As such, any sensitive or important information will be communicated via a more secure medium – either digitally or via professionals in the relevant school office.
- Staff with access to personal information could misuse it. This is avoidable through careful selection of candidates and rigorous monitoring of each teacher. More information on this is available in our Quality Assurance Policy.
- Poor web site security might give a means of access to information about individuals once individual details are made accessible online. Any audio recordings or attainment records will be shared through certified, secure methods, or via email. This information will only remain online while it is relevant.

Data Storage

Student Teaching is moving towards a single, secure online database to store basic information about all its clients and staff. We will, however, continue to hold separate registers of parents and pupils, and teachers may also keep separate information about pupils' attainment.

We will regularly review our procedures for ensuring that our records remain accurate and consistent and, in particular:

- ICT systems will be designed to encourage and facilitate the entry of accurate data.

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- Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.

Rights of access to information

Procedures for responding to subject access requests are made under GDPR.

Parents, schools and staff (and where deemed appropriate, pupils) have the right to access all of the personal data we store about them, to change anything that is inaccurate, to object to processing their data for marketing, or to completely erase all of the data that we hold.

Each request will be actioned in no longer than one month.

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years.

The policy review will be undertaken by the data controller.

Contact

If you have any queries or concerns about this policy, please contact the data controller and general manager, Chris Mayall, by emailing hello@studentteaching.uk or calling 07983084794.