**SEFTON MUSIC SERVICE**

**PRIVACY POLICY**

**Purpose**

Sefton Music Service is committed to protecting your personal information and being transparent about what information we hold about you and your child and children in your care.

This privacy statement is intended for applicants, participants, students and their parents or guardians, schools in which students learn, donors and supporters (together ‘you’ or ‘music service users’).

The purpose of this policy is to give you a clear explanation about how Sefton Music Service use the information we collect from you directly and from third parties.

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

Sefton Music Service needs data in order to fulfil its contractual obligations with music service users in order to provide them with the education for which they or their children have applied. Parents or guardians with children under the age of 18 will act on behalf of their children.

We will only process personal data where we have one of 6 ‘lawful bases’ to do so under Article 6 of the EU General Data Protection Regulations.

Most commonly:

• To **fulfil a contract** with the individual, or when the individual has asked Sefton Music Service to take specific steps before entering into a contract

• For the **legitimate interests** of Sefton Music Service (provided the individual’s rights and freedoms are not overridden)

• Where the individual (or their parent/carer when appropriate in the case of a child) has freely given **consent**

And exceptionally:

• To **comply with a legal obligation**

• To ensure the **vital interests** of the individual e.g. to protect someone’s life

• To perform a task **in the public interest**

**The personal data we hold**

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

Personal data that we may collect, use, store and share (see Data Sharing below) about individuals and music service users includes, but is not restricted to:

• Your full name and title and date of birth and your gender

• Postal address, email address and phone number

• Emergency contact details and contact preferences

• Name of school attended

• Student records

• Results of auditions, internal assessments and externally set exams

• Characteristics, such as special educational needs

• Details of any medical conditions or dietary requirements

• Passport details

• Attendance information

• Safeguarding information

• Details of any support received

• Photographs (see below)

• If you hold a Sefton instrument on loan

**Why we use this data**

We use this data to:

• Manage the application and audition processes

• Manage students’ registration, participation in, and progression through Sefton Music Service programmes including school based music activities

• Provide music and performing arts tuition

• Support student learning

• Monitor and report on student progress

• Provide appropriate pastoral care and ensure welfare of children while in our custody, particularly when on tours and courses

• Protect student welfare and meet our legal obligations relating to child protection and safeguarding

• Assess the quality of our services

• Administer applicants waiting lists

• Manage applications for financial support

• Carry out research for our own purposes

• Comply with contractual / regulatory obligations e.g. reporting to the Arts Council

• Share with partners for joint activities e.g. Music for Youth

• Administer payments and donations

• Keep you updated with Sefton Music Service activities that are relevant to you

• Offer you opportunities to engage further with our activities

• Keep in touch with our alumni

• Generate publicity and advertise Sefton Music Service activities

• Promote events / concerts

• Celebrate the success of our students and raise awareness of their great achievements

**Photographs**

As part of Sefton Music Service activities, we will take photographs of Sefton groups, centre groups, centre activities and individual performers. Such material will be used solely by Sefton, for example, for publicity purposes, such as prospectuses and other similar information; for display in our buildings, on banners at concerts, on our website and for social media purposes; for assessment and educational purposes; and for fundraising or other purposes to help achieve our aims.

For music groups entering the National Festival, run by our partners Music for Youth, and for other national festivals and competitions, photographic data may be collected and used in the same way.

When using photographs for publicity, display or website purposes, we will not accompany them with any other personal information about the child, to ensure they cannot be identified. Although we will carefully use images on the basis of our ‘legitimate interests’ (see above), we understand there may be occasions where music service users provide good reason why we should withdraw certain images. If you ask us to withdraw an image of your child, we will delete the photograph and not distribute it further.

**Emailing Us**

When you send us an email, either to one of the addresses displayed on our website or to an individual member of staff, we will collect your email address and any other information you provide within your email.

Microsoft are our email service provider so any emails you send us will be stored on their servers. Therefore your email and any associated personal data may be transferred outside of the European Economic Area to servers located in the USA. Microsoft's certification under the EU-US Privacy Shield Framework commits it to maintaining appropriate safeguards for international data transfers.

The information you provide will only be processed in relation to the purpose of your correspondence with us. We have no fixed retention period for email correspondence, but we are committed to only storing your data for no longer than is necessary to serve our legitimate interests of record keeping or to perform a contract we have entered into with you.

**Data sharing**

We do not share personal information with any third party unless otherwise stated in this policy without consent, unless the law requires us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information with:

• Local Authority Children’s Services – to comply with Child Licensing regulations under the Body of Persons’ Approval (BOPA)

• Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns

• A student’s family and representatives

• Schools – where we provide tuition for your child in partnership with their school

• Educators and examining bodies

• Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. examining bodies

• Central and local government

• Our auditors

• Health and social welfare organisations

• Professional advisers and consultants

• Charities and voluntary organisations

• Police forces, courts, tribunals

• Professional bodies

**Security of your personal data**

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information confidential and as secure as possible. Your data will only be accessible to authorised staff. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

We undertake to report any data breaches in accordance with Data Protection Act and General Data Protection Regulations guidelines.

**Service providers**

Sefton Music Service uses a small number of third-party service providers in order to carry out some of the activities described above. For example, for enrolment on holiday/weekend courses and special events. Sefton Music Service requires such service providers to use your personal data only for the purpose of the relevant service. Sefton Music Service will never collect payment for services via a third party.

**Your rights to your personal information**

You have the right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

**Contact details and further information**

Please get in touch with us if you have any questions about any aspect of this

Email: [music.service@sefton.gov.uk](mailto:music.service@sefton.gov.uk)

**Living Document**

**Important note.** This is a living document. Updates and amendments should be expected. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

*The Policy will be reviewed to reflect updates in legislation. This policy is next due for review in January 2019 and for renewal in September 2019.*