

APPENDIX J GDPR POLICY AND GUIDANCE

1 TUTOR DECLARATION

- **Tutors will sign a declaration to state that they have read, understood, and will abide by the policy as outlined in this section (2.10); any changes to this policy will be notified to staff and followed up as necessary.**
- Further information and guidelines are available here:
- <https://www.musiciansunion.org.uk/Home/Advice/Your-Career/Legal/GDPR-And-Data-Protection>

2 DATA AGREEMENT WITH PARENTS

- **The agreement we have with parents is that Essex Music Service and its tutors have collected data purely for the purpose of teaching that child.**
- Under GDPR guidelines, we hold student data under 'legitimate interest'.
- When parents sign their children up for lessons via SpeedAdmin, they agree to the following:

1.1 GDPR TEXT

- *The personal data collected in this application directly from you is given voluntarily by you. You are not required to provide this personal information and may withdraw it at any time. If you choose not to disclose the required personal information, the consequence will be that your application cannot be processed. The personal data we collect is used solely for processing enrolment to the school, as well as communication regarding participation in, and possible collection of, subsequent activities. The personal data of the data subject is kept for as long as necessary for the purposes stated above. The registrant is aware that more information about the Personal Data Act and the Personal Data Regulations is available at <https://ico.org.uk/>"*

1.2 TERMS AND CONDITIONS TEXT

- *Essex County Council are collecting this information to support the delivery of a range of music education services across the county. This information will not be shared with any other third party unless the law requires us to do so. For further information about how we handle personal information, please view our online privacy notice on <http://www.essex.gov.uk/privacy-notice>*

2 HOLDING DATA

- **Tutors should only have students' personal data that they need, and hold it for no longer than needed.**
- We understand that tutors may wish to keep a record of students' progress, or have copies of timetables with them away from the individual schools in which they teach, but should only do this where there is a genuine need.
- **You should not have any contact details for your students – if you need to contact a student or their parent for any reason, this should be done through the school office.**
- **You should only ever have the data you need to teach – i.e. their name, instrument – you do not need other data such as date of birth.**
- Personal data should not leave the country with you.
- **When data is no longer needed, it should be deleted.**

3 HOLDING DATA (ONLINE)

- **Where possible, use SpeedAdmin, which stores data securely.**
- **Do not download sensitive or personal information to your private laptop/computer/device; if you do, delete it immediately and inform the Schools' Instrumental Music Lead Officer.**
- If you are storing limited personal data, such as for a tracking pupil progress in a school, it must be:
 - Limited data (i.e. "John H", or "JH" rather than "John Hutchings"), no date of birth or other material/data that could identify the child away from the school.
 - The document must be password protected
 - The laptop/computer/device must be password protected
- Do not store your passwords, or share them with another party.

4 HOLDING DATA (PAPERWORK)

- Only take out in the car what you need for that day's teaching
- When a child discontinues lessons with you, you must safely delete the personal data and records that you have.
- Carry it securely with you at all times (i.e. in a briefcase etc)
- Do not leave paperwork in an unoccupied car.

5 DATA BREACH

- **If there is a breach of personal data under GDPR guidelines, you must inform the Schools' Instrumental Music Lead Officer immediately. If you are unable to get hold of him/her, you must contact a senior member of the Essex Music Service team immediately.**

6 FINES

- Fines are not limited to either the individual or the company.