



Data Protection & GDPR Policy

Policy Statement

Dance Projection is committed to protecting the personal data of all pupils, parents, staff, and volunteers. We collect, process, and store information lawfully, fairly, and securely in line with the UK General Data Protection Regulation (GDPR) 2016/679 and the Data Protection Act 2018.

Heidi Speakman is the Data Controller and has overall responsibility for ensuring compliance with this policy. Co-owners Heidi Speakman and Gemma Hall support in implementation and oversight.

Data Protection Principles

We comply with the six GDPR principles. Personal data must be:

1. Processed lawfully, fairly, and transparently.
 2. Collected for specific, explicit, and legitimate purposes.
 3. Adequate, relevant, and limited to what is necessary.
 4. Accurate and kept up to date.
 5. Retained only as long as necessary.
 6. Stored securely to prevent unauthorised access, loss, or damage.
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Data We Collect

We may collect and store:

- Pupils/Parents: names, date of birth, addresses, phone/email contacts, medical conditions, attendance records, exam entries (ISTD), safeguarding concerns, consent forms, photographs/videos (with consent).
 - Staff/Volunteers: references, DBS checks, payroll/tax information, contracts, job duties, health/absence records, disciplinary notes, and emergency contacts.
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Why We Collect Data

We use data to:

1. Ensure the safety and wellbeing of pupils.
 2. Communicate with families about classes, notices, and events.
 3. Enter pupils for ISTD examinations.
 4. Comply with child protection and performance licensing laws.
 5. Meet legal obligations for tax, employment, and safeguarding.
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Lawful Basis

We process personal data under the following lawful bases:

- **Legitimate interests** – to operate safely and effectively.
 - **Consent** – for photography, video, and some voluntary data.
 - **Public task** – entering exams and meeting safeguarding duties.
 - **Legal obligation** – complying with laws and regulations.
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Storing & Retaining Data

- **Electronic records:** kept on encrypted, password-protected software/systems.
 - **Paper records:** stored securely in locked filing cabinets.
 - **Retention:** data is held only while a pupil is enrolled or for as long as legally required. Once no longer needed, records are securely deleted or shredded.
 - **Media:** photos/videos stored without names attached; deleted after two years or once the pupil leaves (whichever comes first).
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Sharing Data

We share pupil data only with:

- The Imperial Society of Teachers of Dancing (ISTD) – for exam entries.
- Local authorities – for safeguarding and performance licensing requirements.

We will not share data with third parties for marketing. Data will only be shared without consent if required by law.

Subject Access Requests & Your Rights

Under GDPR, individuals have the right to:

- Access the data we hold about them.
- Request correction of inaccurate data.
- Request deletion of data when appropriate.
- Object to processing in certain circumstances.
- Prevent use for direct marketing.
- Claim compensation if data protection laws are breached.

Requests must be made in writing to: **dance.projection@yahoo.com**. Identity will be verified before information is released.

Staff & Volunteer Responsibilities

- Handle data securely and only access information necessary for their role.
 - Never share data informally or disclose to unauthorised persons.
 - Use strong passwords and approved devices.
 - Ensure data is regularly updated and unnecessary records deleted.
 - Seek guidance from the Data Controller if unsure.
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Photo & Video Policy

- Some classes may be recorded for practice purposes. Videos are shared privately with parents via secure links.
 - With parental consent, photographs and videos may be used for promotion (e.g., social media, website).
 - Media will only be used while a pupil is enrolled or for two years, whichever is shorter.
 - Students aged 18 and above must provide their own consent.
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Confidentiality

- All safeguarding and personal records are stored securely and shared only on a “need-to-know” basis.
 - Confidentiality applies equally to pupils, parents, staff, and volunteers.
 - Confidentiality is secondary to a child’s need for protection.
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Review

This policy will be reviewed annually, or sooner if legislation changes.

Signed:

Heidi Speakman – Data Controller

Heidi Speakman & Gemma Hall – Co-Owners

Date: *30th September 2025*

Next Review: *29th September 2026*