

London Borough of Camden: Music Privacy Notice

Data Controller and Data Protection Officer

The Data Controller is London Borough of Camden, Judd Street, London, WC1H 9JE, 020 7974 4444 www.camden.gov.uk

The DPO is Andrew Maughan, Borough Solicitor , dpo@camden.gov.uk

The purpose of the processing

We are processing your data so we can provide your child with the music tuition, instrument hire or weekend activities you have requested. We collect data to ensure we can offer your child the best service and that lessons and activities can be tailored to specific special education needs, disabilities or medical conditions. We collect data to ensure you pay the right fee and get subsidised fees if you are eligible.

Categories of Personal Data- Parents and Pupils

- Name (participating child, parent/guardian and emergency contacts)
- Date of Birth & Year Group
- Gender
- Address
- Contact number
- Email address
- Name of School
- Safeguarding Information
- Instrument Hire information
- Details of learning and activities participated in for the service
- Details of any support received – e.g. Free School Meals, fee remissions and bursaries.
- Exam results, assessment data, and the outcome of auditions

We also keep records of all financial transactions between us and whether you qualify for subsidies or benefits.

Categories of Special Category Data

- Ethnicity (optional)
- Special Educational Needs and Disabilities- Details of Special Educational Needs and Disabilities (optional)
- Medical information, including allergies and dietary requirements (optional)

Categories of Personal Data Music Tutors: see also the employee privacy notice.

- Disclosure & Barring Service (DBS) Certificate
- Next of kin contacts
- Lesson Observation Documents
- HR records, such as completion of Safeguarding & Child Protection Training

Why We Need Your Personal Data

Camden Music collects this information to ensure that our services are run properly and safely. Specifically, to:

- Manage applications
- Provide vocal/instrumental lessons and access to musical groups
- Manage registration, waiting lists, participation and progression through Camden Music's activity programme
- Support student learning
- Monitor and report progress
- Provide appropriate pastoral support for our students and support their welfare while in our care.
- Meet our safeguarding obligations
- Manage requests for financial support
- Quality assure Camden Music and our specific activities
- Monitor inclusion data
- Comply with contractual and funding conditions, e.g. reporting to Arts Council England (ACE), etc.
- Share with partners for joint activities, e.g. Camden Music Trust, London Music Fund, etc.
- Administer payments
- Keep you updated with Camden Music activities and news that are relevant to you
- Offer you opportunities to engage further with our activities
- Promote concerts and events
- Celebrate the success of Camden Music and our students and raise awareness

Photographs and video recording (with consent)

Occasionally, Camden and its authorised partners use pictures, videos or stories for publicity or funding purposes. Such material will be used, for example, for publicity purposes, display in buildings, on banners in concerts, on our website and for social media purposes, for assessment and educational purposes and for fundraising purposes. On registration or re-registration, parents and guardians will be asked to consent for Camden Music to photograph and record their children participating in activities. Parents and guardians can withdraw their consent at any time.

When using photos and videos for publicity or website/ social media purposes, we will not accompany them with any other personal information about the child to ensure they cannot be identified. We may continue to use these photographs and videos after your child has left Camden Music.

Images that might cause embarrassment or distress will not be used. We will only use images of pupils who are suitably dressed to reduce the risk of such images being used inappropriately.

Sharing your data

We will not disclose your information to other organisations unless there is a court order to do so, or the law requires or allows us to do.

We will share details of special education needs, disability or medical information with the tutor or weekend music directors only where we feel it will improve the service your child will receive, or where it will ensure the safety of your child.

Where you have told us you receive Council Tax Support and so qualify for reduced fees, we will check with Council Tax whether you receive Council Tax Support.

Where a student has a specific bursary, as a funding condition, we are expected to report on the individual student's progress and attendance to lessons/rehearsals to the fund provider. For example, Camden Music Trust or other related funding body.

We provide data to organisations like Arts Council England in our reporting, but these are key characteristics, and it is not possible to identify individual students.

We use a software supplier called SpeedAdmin as our administrative service.

Legal basis for processing personal data

For employees, school employees, pupils except for photography: art 6(1)(e) public task;

For photography and media marketing and advertising art 6(1)(a) consent;

For parents and tutors art 6(1)(b) contract;

For tutors' employment information: Art 6(1) (c) Legal obligation and (b) contract

Legal basis for processing special category data:

Children's SEND and medical/disability issues art 9(2)(g) Reasons of substantial public interest with the Data Protection Act 2018 Schedule 1 Part 2 condition being Para 6. Statutory and government purposes and the underpinning law being the Health and Safety at Work Act 1974, Equality Act 2010, Children Acts; Art 9(2) (h) Health or social care Data Protection Act 2018 Schedule 1 Part 1 condition Para 2 Health or social care purposes.

Any special category data in photographs used for marketing (e.g. dress/headwear showing religion or visible disability e.g. assistance dog or hearing aids etc.) explicit consent art 9(2)(a);

Tutor/tutor emergency contact/ student details processed in a medical emergency etc Art 6(1) (d) Vital interests and Art 9(2) (c) Vital interests

Any special category data processed for safeguarding: Art 9(2) (g) Reasons of substantial public interest and the Data Protection Act 2018 Schedule 1 Part 2 condition being para 18. Safeguarding of children and individuals at risk.

Legal basis for processing criminal offence data in DBS checks (tutors): Art 6(1) (b) Contract and Art 6(1) (c) Legal obligation; and Data Protection Act 2018 Schedule 1

condition: para 1 Employment, social security and social protection, Para 6 Statutory and government purposes, and para 18 Safeguarding of children and individuals at risk.

Transfer of your data out of the EU/EEA

We will not transfer your Personal Data outside the EU/EEA. SpeedAdmin processes data in Denmark, which is in the EU.

How long will we keep your data?

We will keep your personal data for a period of two years after you have stopped using our service. This is except where you owe us money. Then we will keep the information for six years or until the debt is paid.

Information about whether giving Personal Data is part of a statutory or contractual requirement or obligation and the consequences of not providing the information

Giving data is not part of a statutory or contractual requirement or obligation. No information is mandatory for you to provide. We do have to provide data to organisations like Arts Council England in our reporting, but these are key characteristics, and it is not possible to identify individual students. Where a student has a specific bursary, as a funding condition, we are expected to report on the individual student's progress and attendance to lessons/rehearsals

Your Data Subject Rights

You have the right to request a copy of the information we hold about you, the right to ask us to rectify, erase or restrict processing of your data, the right to ask for data portability, the right to object to automated decision making, and if we are relying on consent the right to withdraw consent at any time. There are some exemptions to these rights. Please see [our website](#) and the [ICO website](#). To exercise these rights, please use [our web form](#).

We are not using automated Decision Making or profiling to process your Personal Data

Your right to lodge a complaint with a supervisory authority

You can complain to the Information Commissioner's Office if you are unhappy with how the council has handled your personal data. It would be helpful if you contacted us first at dpa@camden.gov.uk to see if we can resolve the problem. You can contact the ICO at Telephone: 0303 123 1113, live chat <https://ico.org.uk/global/contact-us/live-chat/> or webform <https://ico.org.uk/global/contact-us/>

Updates:

This Privacy Notice will be kept under review and updated as needed. It was updated in October 2024