



Kent Music Privacy Policy

Version Number	1.0	Status	Draft
Author	Suzi Williamson	Approval	
Date of Issue	May 2018		
Review Date			
Record of Amendments			
Date	Version Number	Details of Change	Approval
05/05/2022	2.0	Amendments by Communications Manager	Reviewed and approved by DPO 17/05/2022
25/01/2023	2.1	Head office address updated	

Contents

- 1. Kent Music Customers2
 - 1.1 What we collect2
 - 1.2 What we do with the information we gather2
 - 1.3 How long do we keep it2
- 2. Teachers and School Staff.....3
 - 2.1 What we collect3
 - 2.2 What we do with the information we gather3
 - 2.3 How long we keep it3
- 3. Kent Music Website Users and Newsletters3
 - 3.1 What we collect3
 - 3.2 What we do with the information we gather4
 - 3.3 Unsubscribing from marketing emails4
- 3.4 How we use cookies4
- 4. Kent Music staff and contractors4
 - 4.1 What we collect4
 - 4.2 What we do with the information we gather5
 - 4.3 How long do we keep it5
- 5. Security5
- 6. Data Sharing5
- 7. Subject Access Requests.....5
- 8. Right to be Forgotten6
- 9. Links to other websites.....6
- 10. DPO contact details6



PRIVACY POLICY

Kent Music is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website or our services, it will only be used in accordance with this privacy statement and current UK data protection legislation. If you have any questions about this policy, please email customerservices@kent-music.com.

1. Kent Music Customers

When you complete an application form electronically via the Kent Music portal, by email or on paper, Kent Music retains your personal information on a waiting list or in our tuition, group membership or course records.

Once you have engaged with Kent Music, your data may be shared with teaching staff and course venues as appropriate.

1.1 What we collect

We may collect the following information:

- Name and contact information for pupil and parent/carer (as appropriate)
- Dietary, medical, Special Educational Needs and Disabilities (SEN/D) and demographic information
- Educational details, for example school attended and level of education
- Financial details relating to the bill payer and invoicing, including bursary and benefit details where relevant
- Musical progression details, including instrument and teacher, pupil reports, exam results
- Marketing permission (see newsletters, section 3 below), photo and media permissions, offsite and other course permissions, e.g. swimming

1.2 What we do with the information we gather

We require this information to understand your needs and provide you with our best service. In particular it is required for the following reasons:

- Contacting you regarding your use of our services
- Internal record keeping
- We may use the information to improve our services
- Safety and care - for example informing staff of any relevant medical or SEN/D needs
- We may use the information for consent to take and store images (including photo and video) for marketing purposes in line with our Media Policy
- For safeguarding purposes if the need arises

1.3 How long do we keep it

Information about customers is kept for 7 years after the contract with the customer ends, after which time the records are anonymised.

2. Teachers and School Staff

As the lead partner for the Music Education Hub for Kent, we collect and hold details of teachers and staff working in schools in Kent in order to deliver music education. Additionally, we hold and use the data relating to private peripatetic music teachers when they have attended our courses.

2.1 What we collect

We may collect the following information:

- name and job title
- contact information
- school and teaching information
- course attendance and feedback
- marketing permissions (see newsletters, section 3 below)
- Photo and media permissions
- Any medical conditions which we need to be aware of

2.2 What we do with the information we gather

We require this information to understand your needs and provide you with the best service possible. In particular it is required for the following reasons:

- Delivery of contract and schools funding
- Internal record keeping and reporting
- We may use the information to improve our products and services
- Marketing and promotion purposes

2.3 How long we keep it

Information about teachers and school staff is kept up to date and checked at least annually. If and when teachers are no longer working at the school, their details are removed from our database.

3. Kent Music Website Users and Newsletters

Customers can opt into marketing newsletters from the Newsletters area of the website or by ticking the marketing consent box on any application form, and by supplying a name and email address. Other data may be collected as part of online competitions or surveys.

3.1 What we collect

We may collect the following information:

- Name and job title

- Contact information including email address
- Demographic information such as postcode, age, gender, preferences and interests
- Other information relevant to customer surveys and/or offers

3.2 What we do with the information we gather

We require this information to understand your needs and provide you with the best service possible. In particular it is required for the following reasons:

- To share information about musical activity in and around Kent
- For internal record keeping and reporting
- We may use the information to improve our products and services

3.3 Unsubscribing from marketing emails

Customers can unsubscribe from email newsletters at any time by clicking on the Unsubscribe link in an email or by emailing customerservices@kent-music.com.

3.4 How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.

The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs.

We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

4. Kent Music staff and contractors

As an employer, we collect and hold details of teachers and staff working for Kent Music in order to deliver music education. Additionally, we hold and use the data relating to private contractors and volunteers who are also engaged to provide a range of teaching and non-teaching support services.

4.1 What we collect

We may collect the following personal information:

- Name, employment history, qualifications, employment references, next of kin details
- personal ID information such as passport, bank statements, proof of address
- financial details such as NI number, tax details, bank details, student loan, pensions records

- sensitive data such as criminal convictions, medical information, ethnicity and other equality data, disciplinary, grievance and appraisal records

4.2 What we do with the information we gather

We require this information to recruit staff, carry out employment checks, pay salaries, expenses and statutory payments, and to maintain internal records of meetings, appraisals and any formal performance management processes.

4.3 How long do we keep it

Information is kept up to date and is checked at least annually. If employed staff are no longer working for Kent Music, their contact details are removed from our central database however personnel records are retained for payroll, tax and pensions purposes for a minimum of 7 years after employment ceases, and for a maximum of 100 years for pension scheme members. Volunteers and freelance contractors' records would be retained for 1 year after contract ends.

5. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place a full data management policy and suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

6. Data Sharing

Kent Music does not usually share data with third parties, however, data may be shared with teaching staff, contractors or partners in order to deliver music education. Teachers and contractors are required to sign a contract to ensure they adhere to our privacy policy. Teachers and contractors are not passed information if it does not relate to the teaching, for example we do not pass on bursary/financial details, but we do share medical and SEN/D information if this is relevant.

Dietary and medical information relating to students is shared with residential course venues, who are contracted to dispose of this data within a month after the course.

If personal data is shared with other businesses, it is only with the consent of the individual, e.g., in the case of a project being delivered with a partner. The partner signs a Partnership Agreement to ensure that they adhere to our own privacy policy; that they do not share the data further and that they dispose of the data following the project. This process is managed by the Head of Partnerships and Development.

Data shared with Arts Council England as part of the annual survey is anonymised before sharing.

7. Subject Access Requests

You may request details of the personal information which we hold about you under the UK General Data Protection Regulation. If you would like a copy of the information held on you, please write to Kent Music, Units 25 & 26, Creative Enterprise Quarter, Javelin Way, Ashford, TN24 8FN or email customerservices@kent-music.com providing proof of identification.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect.

More information and a template for making a Subject Access Request can be found on the UK Information

Commissioner's website here: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/preparing-and-submitting-your-subject-access-request/>

8. Right to be Forgotten

Customers may request that personal details relating to you be removed from our records under the UK General Data Protection Regulation. If you would like to request erasure from our records, please speak to a member of our team or write to Kent Music, Units 25 & 26, Creative Enterprise Quarter, Javelin Way, Ashford, TN24 8FN or email customerservices@kent-music.com providing proof of identification.

Erasing all personal details will mean that you will no longer be contacted by Kent Music, however if you contact us again in the future (for example regarding a new lesson application or being added to our email newsletter list), new records will be created, and you will then be treated as a new person.

In some cases, we will not be able to erase some or all of your details, for example if they need to be retained for legal reasons. In which case you will be informed of the procedure that has taken place and you have the right to complain to the UK Information Commissioner's Office. Information on how to do this is available at <https://ico.org.uk/make-a-complaint>

9. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website.

Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

10. DPO contact details

If you have a concern about the way we are collecting or using your personal data, please raise your concern with our Data Protection Officer at:

SPS DPO Services

iSystems Integration, Imperial House, 25 North Street, Bromley, BR1 1SD

Phone Number – 020 8050 1387

Email: sps-dpo-services@isystemsintegration.com