



*Education & Bass*



## **Education & Bass / Music Technology Club**

### **Data Protection Policy**

Compliant with UK GDPR and Data Protection Act 2018

**Version:** 3

**Date:** 1 December 2024

**Review Date:** 1 December 2025

**Author:** Andrew Ferguson, Lead Safeguarding Lead, Director, Education & Bass / Music Technology Club

**ICO Registration Reference:** ZA495870

### **Purpose of the Policy**

Education & Bass / Music Technology Club is committed to complying with all relevant privacy and data protection laws, including:

1. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018;
2. The Privacy and Electronic Communications Regulations (2003) and any successor legislation, including the E-Privacy Regulation; and
3. Any other applicable laws, regulations, and guidance issued by the Information Commissioner's Office (ICO).

This policy outlines how Education & Bass / Music Technology Club protects personal data, ensuring lawful, fair, and transparent processing.

Anyone handling personal data on behalf of Education & Bass / Music Technology Club must comply with this policy. Breaches will be treated seriously and may result in disciplinary action.

This policy will be reviewed regularly to reflect changes in legislation, regulatory guidance, or organisational needs.

### **About this Policy**

Education & Bass / Music Technology Club processes personal data from a variety of individuals, including learners, parents, employees, contractors, suppliers, and partners.

Andrew Ferguson, Lead Safeguarding Lead, is responsible for overseeing compliance with this policy and serves as the designated point of contact for data protection matters at [edu@educationandbass.online](mailto:edu@educationandbass.online).

The Senior Leadership Team is responsible for day-to-day data protection compliance.

## Definitions

### Personal Data

Any information relating to an identified or identifiable individual (data subject). Examples include names, contact details, financial records, educational history, or online identifiers.

### Special Categories of Data

Sensitive personal data requiring enhanced protection, such as racial or ethnic origin, political opinions, health data, or biometric information.

### Processing

Any action taken with personal data, including collection, storage, use, or destruction.

### Data Controller

Education & Bass / Music Technology Club, determining the purpose and means of processing personal data.

### Data Processor

A third party processing data on behalf of Education & Bass / Music Technology Club.

### Supervisory Authority

The Information Commissioner's Office (ICO) is the UK's data protection authority.

## Scope

This policy applies to all Education & Bass / Music Technology Club staff and stakeholders. It supplements related policies, such as the Acceptable Use of IT Policy.

## Principles of Data Protection

Education & Bass / Music Technology Club adheres to the six core principles of the UK GDPR:

1. **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and transparently.
2. **Purpose Limitation:** Data is collected for specific, explicit, and legitimate purposes.
3. **Data Minimisation:** Only data necessary for the purpose is collected.
4. **Accuracy:** Personal data is kept accurate and up to date.
5. **Storage Limitation:** Data is not kept longer than necessary.
6. **Integrity and Confidentiality:** Data is protected against unauthorised or unlawful processing.

## Procedures

### Lawful Basis for Processing

Education & Bass / Music Technology Club processes personal data based on one or more lawful bases, including:

- **Consent:** Clear, explicit consent has been obtained.
- **Contract:** Processing is necessary for a contractual agreement.
- **Legal Obligation:** Compliance with legal requirements.
- **Vital Interests:** Protecting someone's life.
- **Public Task:** Processing in the public interest or under official authority.
- **Legitimate Interests:** Necessary for legitimate organisational interests.

### Special Categories of Data

Processing special categories of data requires a lawful basis and additional safeguards. Explicit consent will be obtained unless processing is required by law.

### Data Retention

Education & Bass / Music Technology Club retains personal data only as long as necessary. Typical retention periods include:

- **Employee Data:** 6 years after employment ends.
- **Learner Data:** Until the learner turns 25 (if safeguarding requirements apply).
- **Financial Data:** 6 years (per HMRC guidelines).

A detailed **Data Retention Schedule** is maintained and reviewed regularly.

### Data Security

#### Storing Data Securely

- Printed data is stored securely or shredded when no longer needed.
- Digital data is password-protected and encrypted.
- Servers storing personal data are in secure locations, protected by firewalls and other security measures.
- Data is not stored on unapproved personal devices.

#### Data Breaches

All breaches must be reported to Andrew Ferguson at [edu@educationandbass.online](mailto:edu@educationandbass.online) immediately. Significant breaches are reported to the ICO within 72 hours.

### Rights of Individuals

Education & Bass / Music Technology Club respects the rights of individuals under the UK GDPR, including:

1. **Right to Be Informed:** Transparent privacy notices provided at the time of data collection.
2. **Right of Access:** Individuals can access their data within one month of a request.
3. **Right to Rectification:** Correction of inaccurate or incomplete data.
4. **Right to Erasure:** Data deletion upon request unless required for legal purposes.
5. **Right to Restrict Processing:** Temporary suspension of data use upon request.
6. **Right to Data Portability:** Data provided in a machine-readable format upon request.
7. **Right to Object:** Objection to data processing, including for marketing purposes.
8. **Rights Related to Automated Decision-Making:** Safeguards against significant decisions made without human intervention.

## Data Protection Impact Assessments (DPIAs)

DPIAs are conducted for high-risk processing activities, such as:

- Processing sensitive data on a large scale.
- Use of innovative technologies.
- Systematic monitoring of individuals (e.g., CCTV).
- DPIAs identify risks to individuals and outline mitigation strategies.

## Children's Data

Education & Bass / Music Technology Club complies with the **Children's Code** and provides age-appropriate privacy notices. Parental consent is obtained for processing data of children under 13.

## International Data Transfers

Education & Bass / Music Technology Club does not transfer personal data outside the UK. If future international transfers are necessary, safeguards such as Standard Contractual Clauses (SCCs) will be implemented.

## Monitoring and Review

This policy will be reviewed biennially or in response to legislative changes.

### Acknowledgment:

I confirm that I have read, understood, and agree to comply with this policy.

### Employee Signature:



**Print Name:** Andrew Ferguson

**Date:** December 11th 2024

