



RTA Kids

Privacy Notice

Rom Theatre Arts Kids (RTA Kids)

Effective from: August 2026

Last reviewed: August 2026

Next review: August 2027

1. Introduction

ROM Theatre Arts, trading as **RTA Kids**, is committed to protecting the privacy and personal information of the children, young people, parents/carers, staff, tutors, volunteers and other individuals who interact with us.

This Privacy Notice explains:

- What personal information we collect.
- Why we collect it.
- How we use it.
- Who we may share it with.
- How we keep it secure.
- How long we keep it.
- Your rights in relation to your personal information.
- How to contact us if you have questions or concerns.

RTA Kids works with children and young people aged approximately **2–18 years**, and we recognise that children's personal information requires particular care and protection.

The ICO confirms that children's personal data has additional protections under UK data protection law and that privacy information directed towards children should be clear and age-appropriate.

2. Who We Are

Data Controller:

Rom Theatre Arts Kids (RTA Kids)

Contact:

hello@rtakids.co.uk

For the purposes of UK data protection legislation, RTA Kids is the organisation responsible for deciding how and why personal information is processed.

If you have any questions regarding how we use personal information, please contact us using the email address above.

3. The Data Protection Laws We Follow

RTA Kids processes personal information in accordance with applicable UK data protection legislation, including:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- Data (Use and Access) Act 2025, where applicable.
- Privacy and Electronic Communications Regulations (PECR).
- Relevant safeguarding legislation and statutory guidance.

RTA Kids also follows relevant safeguarding procedures applicable to organisations working with children in Essex.

The Essex SET Child Protection and Safeguarding Procedures were updated for 2026 and provide guidance for organisations on safeguarding concerns and information sharing.

4. What Personal Information We Collect

Depending on the relationship you have with RTA Kids, we may collect some or all of the following information.

Student information

This may include:

- Full name.
- Preferred name.
- Date of birth.
- Age.
- Address.
- Photograph.
- Video recordings.
- Class information.
- Attendance information.
- Performance and examination information.
- Competition information.
- Costume and clothing sizes.
- Emergency contact details.
- Parent/carers details.
- Collection and authorised-pick-up information.

Parent/carers information

This may include:

- Name.
- Address.
- Email address.
- Telephone number.
- Relationship to the child.
- Parental responsibility information.
- Emergency contact information.
- Payment information.
- Direct Debit information where applicable.
- Communication preferences.

Health and welfare information

Where necessary for a child's safety and wellbeing, we may collect information relating to:

- Medical conditions.
- Allergies.
- Medication.
- Dietary requirements.
- Injuries.
- Accessibility requirements.
- Additional needs.
- Relevant mental or physical health information.
- First aid or accident records.

Some health information is **special category data** under the UK GDPR and receives additional protection.

5. Safeguarding Information

As an organisation working with children, RTA Kids may need to collect and retain safeguarding information.

This may include:

- Safeguarding concerns.
- Child protection records.
- Records of disclosures.
- Allegations.
- Welfare concerns.
- Relevant correspondence with parents/carers.
- Information received from schools or other professionals.
- Information from children's social care.
- Information from safeguarding partners or other agencies.
- Information relating to court orders or restrictions where relevant.

Safeguarding information will only be accessed by people who need it for their role.

Where necessary to protect a child, information may be shared with appropriate safeguarding partners, children's social care, the police, healthcare professionals, schools or other relevant agencies.

RTA Kids will not allow data protection considerations to prevent necessary safeguarding information sharing. The ICO recognises safeguarding as a compelling reason for sharing children's personal information where appropriate and in the child's best interests.

6. Why We Collect and Use Personal Information

We collect and use personal information for purposes including:

Providing our services

To:

- Enrol students.
- Allocate students to classes.
- Manage timetables.
- Contact parents/carers.
- Deliver teaching.
- Manage rehearsals.
- Organise performances.
- Manage workshops.
- Arrange examinations and competitions.
- Record attendance.

Safety and safeguarding

To:

- Protect children and young people.
- Respond to safeguarding concerns.
- Manage medical emergencies.
- Manage allergies and medical needs.
- Maintain appropriate emergency information.
- Comply with safeguarding responsibilities.

Administration

To:

- Manage accounts.
- Process payments.
- Issue invoices.
- Manage Direct Debits.
- Communicate regarding outstanding balances.
- Manage refunds.
- Maintain appropriate business records.

Events and performances

To:

- Organise shows.

- Manage costumes.
- Allocate roles.
- Arrange rehearsals.
- Manage tickets.
- Organise chaperones.
- Communicate venue information.
- Meet performance and licensing requirements.

Marketing and publicity

Where appropriate consent has been provided, we may use photographs and video recordings for:

- Website content.
- Social media.
- Advertising.
- Promotional material.
- Posters and flyers.
- Programmes.
- Newsletters.
- Press coverage.
- Promotional videos.

Our separate **Photography, Filming & Media Policy** explains this in more detail.

7. Our Lawful Bases for Processing

RTA Kids will identify an appropriate lawful basis before processing personal information.

Depending on the circumstances, this may include:

Contract

We may process information where it is necessary to provide the services agreed with a parent/carer, such as administering a student's enrolment and classes.

Legal obligation

We may process information where we are required to comply with a legal obligation.

Legitimate interests

We may process information where this is necessary for our legitimate interests, provided that those interests are not overridden by the rights and interests of the individual.

Examples may include:

- Managing our business.
- Communicating with customers.
- Maintaining appropriate business records.
- Protecting our organisation and students.
- Improving our services.

The ICO's current guidance confirms that legitimate interests remains a lawful basis under the UK GDPR, but organisations must assess whether it is appropriate for the particular processing.

Consent

We may rely on consent where appropriate.

For example:

- Promotional photography.
- Certain marketing communications.
- Optional uses of photographs or video.
- Other processing where consent is the appropriate lawful basis.

Where consent is used, it will be possible to withdraw consent.

Consent will not be used where another lawful basis is more appropriate.

8. Special Category Information

Certain information requires additional protection under the UK GDPR.

This may include information relating to:

- Health.
- Medical conditions.
- Allergies.
- Disability.
- Racial or ethnic origin.
- Religious beliefs.
- Other categories defined as special category data.

Where RTA Kids processes special category data, we will identify both:

1. An appropriate Article 6 lawful basis; and
2. An applicable Article 9 condition.

The ICO confirms that special category information requires both of these legal requirements to be satisfied.

We will only collect special category information where it is reasonably necessary and will take additional care to protect it.

9. Children's Personal Information

RTA Kids recognises that children and young people have their own privacy rights.

We will:

- Treat children's information with particular care.
- Only collect information that is reasonably necessary.

- Avoid collecting excessive information.
- Explain privacy matters in age-appropriate language where appropriate.
- Take children's views into account where appropriate.
- Apply appropriate safeguards to online services and communications.
- Avoid using children's information in ways that are unexpected or unfair.

The ICO's Children's Code sets out standards intended to ensure children's personal information receives appropriate protection when they use online services.

10. Information About Children Provided by Parents

Parents/carers will generally provide information about children when enrolling them at RTA Kids.

Where a parent/carer provides information about a child, RTA Kids will use it only for appropriate purposes and in accordance with this Privacy Notice.

Parents/carers should ensure information provided to RTA Kids is accurate and kept up to date.

11. When We May Share Information

RTA Kids will not sell children's personal information.

We may share information where necessary and lawful with:

- Parents/carers.
- RTA Kids staff and tutors who need the information for their role.
- Chaperones where necessary for safeguarding or performance purposes.
- Payment providers.
- Direct Debit providers.
- Booking and administration systems.
- IT and software providers.
- Professional photographers/videographers where authorised.
- Examination organisations.
- Competition organisers.
- Theatre and venue operators where necessary.
- Schools where appropriate and authorised.
- Children's social care.
- Police.
- Healthcare professionals.
- Safeguarding partners.
- Local authorities.
- Other relevant agencies where legally required or necessary to protect a child.

We will consider the purpose, necessity, proportionality and lawful basis before sharing personal information.

The ICO states that organisations must identify a lawful basis before sharing personal information.

12. Safeguarding Information Sharing

In safeguarding circumstances, RTA Kids may share information without parental consent where there is a lawful basis to do so.

For example, this may be necessary where:

- A child may be at risk of significant harm.
- There is a concern about abuse or neglect.
- There is a concern about exploitation.
- The police require information.
- Children's social care requires information.
- Information is necessary to protect a child or another person.

Where appropriate, RTA Kids will explain information sharing to parents/carers.

However, we may not inform a parent/carer before sharing information where doing so could:

- Increase the risk to a child.
- Compromise an investigation.
- Place another person at risk.
- Interfere with police or social care enquiries.

13. Photography and Video

RTA Kids may photograph and film students during:

- Classes.
- Rehearsals.
- Shows.
- Workshops.
- Competitions.
- Events.

Photography and filming for promotional purposes will be managed in accordance with our **Photography, Filming & Media Policy** and the relevant consent arrangements.

Parents/carers can change their photography preferences by contacting:

hello@rtakids.co.uk

14. Marketing Communications

RTA Kids may contact parents/carers about:

- Classes.

- Timetables.
- Performances.
- Workshops.
- Events.
- Important administrative information.
- Changes to services.
- Accounts and payments.

Where marketing communications require consent under applicable electronic marketing rules, we will obtain the appropriate consent.

You can unsubscribe from optional marketing communications at any time.

Please note that unsubscribing from marketing does **not** prevent us from sending essential service communications, such as information about classes, payments, safeguarding or changes affecting your child's enrolment.

15. WhatsApp and Electronic Communication

RTA Kids may use electronic communication systems, including email and WhatsApp, to communicate with parents/carers.

These communications may include:

- Timetable information.
- Class reminders.
- Show information.
- Workshop information.
- Urgent announcements.
- Administrative information.

RTA Kids will take reasonable steps to ensure that children's personal information is not unnecessarily disclosed through group communications.

Staff must not use personal social media accounts to communicate privately with students.

16. Payment Information

Where parents/carers make payments to RTA Kids, we may process:

- Account holder name.
- Payment history.
- Invoice information.
- Direct Debit details.
- Transaction information.
- Outstanding balances.

Where payment processing is carried out by a third-party provider, that provider may process relevant payment information under its own privacy arrangements.

RTA Kids does not require parents/carers to send full bank card details by email.

17. Third-Party Service Providers

RTA Kids may use third-party providers to operate our business.

These may include providers of:

- Website hosting.
- Email.
- Payment processing.
- Direct Debits.
- Booking systems.
- Customer management systems.
- Cloud storage.
- Communication platforms.
- Accounting services.
- Marketing systems.
- Photography/filming services.

Where appropriate, RTA Kids will ensure appropriate contractual and data protection arrangements are in place with service providers.

18. International Transfers

Some service providers may process personal information outside the United Kingdom.

Where personal information is transferred internationally, RTA Kids will ensure that an appropriate legal safeguard is in place in accordance with applicable UK data protection law.

This may include:

- UK adequacy regulations.
- Appropriate contractual safeguards.
- Other lawful transfer mechanisms.

19. How We Protect Personal Information

RTA Kids takes reasonable and appropriate technical and organisational measures to protect personal information against:

- Unauthorised access.
- Loss.
- Accidental destruction.
- Misuse.
- Unauthorised disclosure.
- Unauthorised alteration.

Access to personal information is restricted to individuals who need it for legitimate RTA Kids purposes.

Data protection should be built into systems and processes from the outset rather than added afterwards. This reflects the ICO's current data-protection-by-design guidance.

20. How Long We Keep Information

RTA Kids will not keep personal information indefinitely without a legitimate reason.

Retention periods will depend upon:

- The type of information.
- Why it was collected.
- Legal requirements.
- Safeguarding requirements.
- Financial/accounting requirements.
- Whether a dispute exists.
- Whether the information is required as part of an ongoing relationship.

Some safeguarding records may need to be retained for longer than ordinary administrative records.

When information is no longer required, it will be securely deleted or destroyed.

21. Your Data Protection Rights

Depending on the circumstances, individuals have rights under UK data protection law, including:

Right to be informed

You have the right to understand how your personal information is being used.

Right of access

You can ask for a copy of personal information RTA Kids holds about you.

This is commonly known as a **Subject Access Request (SAR)**. The ICO's current guidance confirms that SARs can be made verbally or in writing.

Right to rectification

You can ask us to correct inaccurate or incomplete information.

Right to erasure

In certain circumstances, you can ask us to delete your personal information.

This right is not absolute and may not apply where RTA Kids has a legal or safeguarding reason to retain information.

Right to restrict processing

You may ask us to restrict how your information is used in certain circumstances.

Right to object

You may have the right to object to certain processing, including some processing based on legitimate interests.

Right to data portability

In certain circumstances, you may request your information in a structured, commonly used and machine-readable format.

Rights relating to automated decision-making

Where applicable, you have rights relating to solely automated decision-making and profiling.

Not all rights apply in every circumstance.

22. Children's Rights

Children and young people have their own data protection rights.

A parent/carer does not automatically have an unrestricted right to access all information RTA Kids holds about their child.

When responding to a request concerning a child, RTA Kids will consider:

- The child's age.
- Their level of understanding.
- Their wishes.
- The nature of the information.
- Safeguarding considerations.
- Whether disclosure would be in the child's best interests.

The ICO confirms that children's rights to access their own personal information need to be considered separately from a parent's rights.

23. How to Make a Data Protection Request

To make a request regarding personal information, please contact:

Email: hello@rtakids.co.uk

Please provide enough information for us to understand your request and identify the relevant information.

We may need to verify your identity before releasing personal information.

24. Data Protection Complaints

If you have concerns about the way RTA Kids has handled your personal information, please contact us first:

hello@rtakids.co.uk

We will investigate your concern and respond appropriately.

Under the current ICO framework, organisations are required to have appropriate arrangements for handling data protection complaints, including acknowledging complaints within the applicable timeframe.

If you remain dissatisfied, you can raise a concern with the:

Information Commissioner's Office (ICO)

[Information Commissioner's Office](https://ico.org.uk/)

25. Data Breaches

If RTA Kids becomes aware of a personal data breach, we will assess the incident and take appropriate action.

This may include:

- Containing the breach.
- Assessing the potential risk.
- Recording the incident.
- Informing affected individuals where appropriate.
- Reporting the breach to the ICO where legally required.

Where a breach presents a risk to individuals' rights and freedoms, applicable reporting requirements will be followed.

26. Safeguarding Takes Priority

Nothing within this Privacy Notice prevents RTA Kids from taking appropriate action to protect a child or young person.

Where there is a genuine safeguarding concern, RTA Kids may process and share information where permitted or required by law.

The safety and welfare of the child will remain our priority.

Essex's current safeguarding procedures specifically provide guidance to organisations on managing safeguarding concerns and sharing information to protect children.

27. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect:

- Changes in legislation.
- Changes to ICO guidance.
- Changes to our services.
- Changes to our systems.
- Changes to safeguarding requirements.
- Changes to how we process personal information.

The latest version will be made available through RTA Kids administration and/or our website.

Where changes are significant, we will take reasonable steps to bring them to the attention of affected individuals.

28. Contact Us

If you have any questions about this Privacy Notice or how RTA Kids uses personal information, please contact:

RTA Kids / Rom Theatre Arts Kids

Email: hello@rtakids.co.uk

Designated Safeguarding Lead: Mikki Rom

Deputy Designated Safeguarding Lead: Bethany Brown

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