

# CLIQUE

C O L L E G E

## GDPR & General Privacy Policy



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[www.cliquecollege.com](http://www.cliquecollege.com)

# CLIQUE College General Privacy & GDPR Policy

Issue and Review

Date of Issue: December 2021

Last Reviewed: August 2024

This Policy will be reviewed annually

## 1. Statement

The General Data Protection Regulation (GDPR) replaces the previous Data Protection Act directives. Approved by the EU Parliament in 2016, it came into effect on 25th May 2018.

GDPR mandates that personal data must be 'processed fairly and lawfully' and 'collected for specified, explicit and legitimate purposes. It ensures that individuals' data is not processed without their knowledge and only with their explicit consent. This regulation covers personal data relating to individuals. CLIQUE College is committed to protecting the rights and freedoms of individuals regarding the processing of personal data related to children, parents, visitors, and staff.

The Data Protection Act gives individuals the right to know what information is held about them and provides a framework to ensure that personal information is handled properly. CLIQUE College is registered with the Information Commissioner's Office (ICO) under registration reference: ZB287115. The certificate is displayed in the CLIQUE office.

## 2. Individual Rights under GDPR

GDPR provides seven key rights for individuals:

### 2.1 Right to be Informed

CLIQUE College and its affiliated teachers, including those linked to RSL Awards and various other organizations, are required to collect and manage certain data. This includes:

Parents: Names, addresses, telephone numbers, and email addresses.

Students: Full names, addresses, dates of birth, SEN requirements, and medical information related to their activities.

Teachers: Names, addresses, email addresses, telephone numbers, dates of birth, tax registration information, photographic ID, bank details, DBS check details, and proof of eligibility to work in the UK.

Some data may be provided to local authorities (e.g., Kent County Council, Maidstone Borough Council, Medway Council) via a secure electronic file transfer system. Event organizers may also require performers' names and dates of birth.

CLIQUE College uses cookies on its website to collect anonymous data for Google Analytics.

## 2.2 Right of Access

Individuals can request access to their data at any time, and CLIQUE College must respond within one month. CLIQUE College may refuse a request if there is a lawful obligation to retain the data, but the individual will be informed of the reasons and their right to complain to the ICO if dissatisfied.

## 2.3 Right to Erasure

Individuals can request the deletion of their data where there is no compelling reason for its continued use. CLIQUE College has a legal duty to retain certain records for specific periods:

Children's and parents' details: 3 years after leaving.

Children's accident and injury records: 19 years (or until the child reaches 21 years).

Child Protection records: 22 years or until the child reaches 24 years.

Staff records: 6 years after leaving employment.

Data is archived securely on-site and shredded after the legal retention period.

## 2.4 Right to Restrict Processing

Individuals can object to the processing of their data, meaning records can be stored but not used (e.g., in reports or communications).

## 2.5 Right to Data Portability

CLIQUE College may transfer data from one IT system to another (e.g., to a Local Authority or RSL for quality assurance) using secure file transfer systems. These recipients have their own GDPR policies and procedures.

## 2.6 Right to Object

Individuals can object to their data being used for certain activities like marketing or research.

## 2.7 Right Not to Be Subject to Automated Decision-Making, Including Profiling

CLIQUE College does not use personal data for automated decision-making or profiling.

### 3. Storage and Use of Personal Information

**Paper Records:** Kept in a locked filing cabinet in the main office. Registration form data is entered into a secure, password-protected database. Staff can access these files, but information is confidential and remains on-site, shredded after the retention period.

**Electronic Records:** Names, dates of birth, and addresses used in documents like monthly attendance registers and referral forms are shredded after the relevant retention period.

**Waiting List Data:** Names and addresses of students on the waiting list are shredded if they do not attend or are added to the student's file.

**Visual Data:** Photos, video clips, and sound recordings are stored unless consent is withdrawn in writing. No names are stored with images in public displays or on social media.

**Office Computers:** Password protected. Portable data storage (e.g., USB sticks, cameras, tablets) is password protected and/or stored in a locked filing cabinet.

### 4. GDPR Compliance Requirements

CLIQUE College must:

Manage and process personal data properly.

Protect individuals' rights to privacy.

Provide individuals with access to all personal information held about them.

**Note:** This policy complies with UK law and GDPR requirements, ensuring the protection and proper handling of personal data.