SUN-RAE INCLUSIVE DANCE • OXFORDSHIRE

Data Protection & Privacy Policy (UK GDPR)

Privacy, Special Category Health Data & Data Governance Policy

Organisation	Sun-Rae Inclusive Dance
Policy Effective Date	27/11/2026
Next Review Date	26/11/2027
Data Protection Lead	Elizabeth-Rae Large

1. Purpose and Scope

Sun-Rae Inclusive Dance is committed to protecting the privacy, dignity, and personal data of all dancers, parents, carers, volunteers, staff, and supporters. We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy explains what personal information we collect, why we collect it, how we keep it safe, and the rights individuals have over their data across our Oxfordshire classes, workshops, shows, and competitions.

2. Core Data Protection Principles

We ensure all personal data is:

- **Lawful, fair, and transparent:** Processed clearly and openly so people know how their information is used.
- **Purpose-limited:** Collected only for specific, explicit, and legitimate purposes—running safe, inclusive dance classes and events.
- **Data-minimised:** Adequate, relevant, and strictly limited to what is necessary.
- **Accurate:** Kept accurate and up to date, with prompt corrections when notified.
- **Storage-limited:** Retained for no longer than necessary.
- **Secure:** Protected with appropriate technical and organisational security measures.

3. What Information We Collect

Depending on how someone interacts with Sun-Rae Inclusive Dance, we may collect:

- **Participant & Parent/Carer Details:** Names, dates of birth, postal addresses, email addresses, phone numbers, and emergency contact details.
- **Special Category Data (Health & Accessibility):** Information about disabilities, medical conditions, allergies, mobility equipment (such as wheelchairs), communication preferences, and support needs required to keep dancers safe and adapt sessions inclusively.
- **Safeguarding & Incident Records:** Records of safeguarding concerns, disclosures, accident logs, and individual risk assessments.
- **Media & Marketing:** Photographs, videos, and performance footage (only where explicit consent has been given).
- **Staff & Volunteer Records:** Contact details, emergency contacts, bank/payment details, training records, references, and Enhanced DBS check confirmation details.
- **Financial & Booking Information:** Class attendance registers, fee payments, and merchandise or ticket orders.

4. Our Lawful Bases for Processing Data

Under UK GDPR, we rely on the following lawful bases:

- **Contract:** To register dancers, manage class bookings, process payments, and deliver sessions or events.
- **Legal Obligation:** To meet statutory duties regarding safeguarding, health and safety, tax and accounting, and safer recruitment checks.
- **Vital Interests:** To share essential medical or emergency information with paramedics or healthcare professionals in a life-threatening emergency.
- **Legitimate Interests:** To communicate essential class updates (such as venue changes or cancellations) and manage day-to-day operations safely.
- **Consent:** For taking or sharing photographs and videos on social media or promotional materials, and for sending optional newsletters. Consent can be withdrawn at any time.

Processing Special Category Data (Health & Disability)

Because health and disability information is sensitive Special Category Data, we process it only where necessary for safeguarding children and individuals at risk, fulfilling health and safety obligations, providing reasonable adjustments and inclusive care, or with explicit consent from the participant or parent/carer.

5. Children's Data and Accessible Privacy Information

- **Parental/Guardian Consent:** Where a dancer is under 18 (or lacks capacity to provide independent digital consent), consent for optional processing—such as photography or marketing—is obtained from a parent or legal guardian.
- **Accessible Communication:** We explain how we use personal information in clear, accessible language so young people and dancers with learning disabilities understand what happens to their data.

6. How We Store, Protect, and Share Data

- **Digital & Physical Security:** Digital records are stored on password-protected devices and encrypted cloud systems with restricted access. Paper forms (such as emergency contact cards or safeguarding notes) are kept in locked storage.
- **Strict Access Control:** Only Elizabeth-Rae Large and authorised coaches or staff who strictly need the information to support a dancer safely can access personal or health details.
- **No Selling of Data:** We never sell, rent, or trade personal data to third parties.
- **Limited, Necessary Sharing:** We only share data where necessary with emergency services or medical professionals in an emergency; Oxfordshire County Council safeguarding teams (MASH / Safeguarding Adults) or the police where legally required to protect someone from harm; or trusted booking, payment, and event organisers where appropriate data safeguards are in place.

7. Data Retention Schedule

We keep personal data only for as long as necessary for the purpose it was collected:

Record Category	Retention Period & Basis
Class Registers & General Participant Records	Kept while active and for 2years after leaving, unless required longer for insurance or legal claims.
Accident & Injury Logs	Kept for 3 years (or until age 21 for children, in line with limitation periods).

Record Category	Retention Period & Basis
Safeguarding Records	Stored securely in restricted files and retained in line with statutory safeguarding guidance and insurance rules.
Photos & Videos	Reviewed annually and deleted promptly from active channels and storage if consent is withdrawn.

8. Individual Rights

Under UK GDPR, individuals (and parents or carers acting on behalf of children) have the right to:

- **Access:** Request a copy of the personal data we hold about them (Subject Access Request).
- **Rectification:** Ask us to correct inaccurate or incomplete information.
- **Erasure:** Request deletion of data where there is no overriding legal reason for us to keep it.
- **Restrict or Object:** Ask us to limit or stop certain types of data processing.
- **Withdraw Consent:** Withdraw consent at any time (for example, for photographs, videos, or newsletters).

To exercise any of these rights, please contact Elizabeth-Rae Large at [Insert Email Address]. We will acknowledge your request and respond within one calendar month.

9. Data Breaches and Complaints

- **Personal Data Breaches:** If a personal data breach occurs that risks individuals' rights or freedoms, we will investigate immediately, take steps to contain it, and notify the Information Commissioner's Office (ICO) within 72 hours where legally required, as well as informing affected individuals.
- **Raising a Concern or Complaint:** Anyone with concerns about how we handle personal data should contact Elizabeth-Rae Large first. You also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

10. Policy Adoption & Sign-Off

Data Protection Lead Name:	Elizabeth-Rae Large
Signature:	ER Lareg
Date Adopted:	27/11/2026