



Privacy Policy

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Privacy Policy

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1. Introduction

ElliTe Studios is committed to protecting your personal information.

This Privacy Policy is intended to provide information about how ElliTe Studios will use (or "process") personal data about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents"), donors, sponsors and audiences.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents, students, donors, and audiences are all encouraged to read this Privacy Policy.

This Privacy Policy applies alongside any other information ElliTe Studios may provide about a particular use of personal data, for example when collecting data via an online or paper form.

If you have questions regarding your information or its use, please contact our Data Controller via email to office@ellitestudios.co.uk

2. How we collect your personal information

Generally, ElliTe Studios receives personal information from the individual directly (including, in the case of students, from their parents). This may be via a form, online registration or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

3. The types of information we collect

These include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information;
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any additional needs), and examination scripts and marks;
- personnel files, including in connection with employment or safeguarding;
- where appropriate, information about student and staff health and medical records, and contact details for their next of kin;

- references given or received by ElliTe Studios about students and staff, and information provided by previous educational establishments and/or other professionals or organisations working with students and staff;
- correspondence with and concerning staff, pupils and parents past and present; and
- still and moving images of students (and occasionally other individuals) engaging in school activities;
- transaction and order details
- equality and diversity monitoring information
- information relating to surveys and other feedback

4. Why we collect your personal information and how we use it

In order to carry out its ordinary duties to staff, students, parents, users, donors and audiences, ElliTe Studios needs to process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation.

Some of this activity ElliTe Studios will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its students.

Other uses of personal data will be made in accordance with ElliTe Studios' legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

ElliTe Studios expects that the following uses will fall within that category of its "legitimate interests":

- For the purposes of student selection (and to confirm the identity of prospective students and their parents);
- To provide teaching and monitor students' progress and educational needs;
- Maintaining relationships with alumni (see below);
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor ElliTe Studios' performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To share publicly the achievements of students at ElliTe Studios;
- To safeguard students' welfare and provide appropriate pastoral care;
- To make use of photographic images of students in ElliTe Studios publications, on the ElliTe Studios website and (where appropriate) on ElliTe Studios' social media channels and in regional, national and international press, marketing and advertising in accordance with the ElliTe Studios' Image Consent policies;
- To carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for ElliTe Studios' purposes, including to obtain appropriate professional advice and insurance for ElliTe Studios.
- In addition, ElliTe Studios will on occasion need to process special category personal data (concerning health, ethnicity, religion, or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding and cooperation with police or social services, for insurance purposes or to caterers or organisers of visits who need to be made aware of dietary or medical needs;
 - To provide educational services in the context of any different abilities and additional needs of a student;
 - In connection with employment of its staff, for example DBS checks, welfare or pension plans;
 - As part of any Internal or external complaints, disciplinary or investigation process that involves such data, for example if there are any health or safeguarding elements;
- or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

ElliTe Studios will not sell, rent, trade or distribute your personal data to any third parties for marketing purposes unless we have received your prior permission to do so. Data may be shared with trusted service providers who are authorised to act on ElliTe Studios' behalf and have entered into data processing agreements with us. These services may include payment processing, event ticketing, database services, website hosting and email delivery services. In these circumstances your data will only be used for the agreed purpose relating to the service that they are providing. We do not transfer any personal data to countries outside of the European Economic Area (EEA).

5. How we handle your information and other organisations

For the most part, personal data collected by ElliTe Studios will remain within the organisation and will be processed by appropriate individuals only in accordance with access protocols (ie on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records
- pastoral or safeguarding files.

However, a certain amount of students' relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Occasionally, ElliTe Studios will need to share personal information relating to its community with third parties, such as professional advisers (medical consultants, lawyers, insurers, PR advisors, accountants), government authorities (HMRC, Office for Students (OfS), police), and appropriate regulatory bodies (Ofsted, the Information Commissioner).

Staff, students and parents are reminded that ElliTe Studios is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the ElliTe Studios Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of ElliTe Studios' processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with ElliTe Studios' specific directions.

6. How We Protect Your Data

ElliTe Studios is committed to protecting the personal information you entrust to us. We adopt robust and appropriate technologies and policies, so the information we have about you is protected from unauthorised access and improper use e.g. our own network is protected.

As part of the services offered to you through the ElliTe Studios website, external providers may transfer your personal information to countries outside the European Economic Area (EEA). By way of example, this may happen if any of the computer servers used to host the website are located in a country outside of the EEA.

ElliTe Studios will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Information will not be kept longer than is necessary. Incident reports and safeguarding files may need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about retention of data, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Controller at office@ellitestudios.co.uk. However, please bear in mind that ElliTe Studios may have lawful and necessary reasons to hold on to some personal data even following such request.

If you ask us to stop sending direct marketing or development communications to you, we will keep the minimum amount of information (e.g. name, address or email address) to ensure we adhere with such requests.

ElliTe Studios will use the personal data of parents, alumni and other members of ElliTe Studios' community so that we may keep them informed, by email, of ElliTe Studios' developments, provide opportunities to attend events and performances, and identify ways they can support ElliTe Studios.

We may also keep personal data of alumni within our archives to demonstrate the organisation's cultural heritage and provide a resource for alumni to support their professional career and/or public image.

Should you wish to limit or object to any such use, or would like further information about them, please contact office@ellitestudios.co.uk. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, ElliTe Studios may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

7. Your Choices

Individuals have various rights under Data Protection Law to access and understand personal data about them held by ElliTe Studios, and in some cases ask for it to be erased or amended or have it transferred to others, or for ElliTe Studios to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Controller via emailing office@ellitestudios.co.uk.

ElliTe Studios will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information.

ElliTe Studios will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, ElliTe Studios may ask you to reconsider or require a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal professional privilege (for example legal advice given to or sought by ElliTe Studios, or documents prepared in connection with a legal action).

ElliTe Studios is also not required to disclose any student assessment results, nor share any confidential reference given by ElliTe Studios itself for the purposes of the education, training or employment of any individual.

The "right to be forgotten": we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. All such requests will be considered on their own merits.

Student requests

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of ElliTe Studios, they have sufficient maturity to understand the request they are making. A student of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child's. For older students the parent making the request may need to evidence their child's authority for the specific request.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. ElliTe Studios may consider there are lawful grounds for sharing with or without reference to that student.

All information requests from, or on behalf of, or concerning students – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

Consent

Where ElliTe Studios is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that ElliTe Studios may have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Policy, or may otherwise exist under some form of contract or agreement with the individual (eg an employment or student contract, or because a purchase of goods, services or membership of one of our schemes has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, ElliTe Studios will often rely on parental authority or notice for the necessary ways it processes personal data relating to students. For example, under the parent contract or via a form. Parents and students should be aware that this is not necessarily the same as ElliTe Studios relying on strict consent as outlined above.

Where consent is required, it may in some cases be necessary or appropriate - given the nature of the processing in question, and the student's age and understanding, to seek the student's consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, ElliTe Studios will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, eg for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in ElliTe Studios' opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, ElliTe Studios may be under an obligation to maintain confidentiality unless, in ElliTe Studios' opinion, there is a good reason to do otherwise; for example where ElliTe Studios believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others. Staff are under professional duties to do the same covered under the relevant staff policy.