

## Customer Privacy Notice

SIPS Education Ltd is committed to protecting your personal information and being transparent about what information we hold about you. We take our responsibilities very seriously and we continuously strive to be fully compliant with General Data Protection Legislation (GDPR) 2018.

SIPS is a 'data controller' for the purposes of GDPR. This privacy notice is intended for you as our customer, to give you a clear explanation about your rights, how we keep personal information you share with us safe, the legal basis we rely on to use information and the purposes for which we use the information we collect from you and relevant third parties.

### The personal data we hold

The personal data we may collect, store, use and share about customers includes, but is not restricted, to individuals':

- Full name and title
- Job title
- Postal address, email address and contact number(s)
- Details of support provided as part of a contract, or a one-off purchase made by you
- Photographs and video recordings
- CCTV images captured on SIPS Education Ltd premises

For those customers who purchase our HR services, the following personal data may also be processed in relation to School staff:

- Name, address, and contact details, including email address and telephone number, date of birth and gender
- Terms and conditions of employment
- Details of qualifications, skills, experience, and employment history
- Marital status and emergency contacts
- Nationality and entitlement to work in the UK
- Criminal records (if applicable)
- Information about medical or health conditions, including whether or not employees have a disability for which the School needs to make reasonable adjustments

- Equal opportunities monitoring information including information about employees' ethnic origin, sexual orientation, and religion or belief
- Information relating to HR casework – including but not limited the following examples – data relating to any disciplinary, grievance, sickness absence, performance, occupational health referrals etc.
- Additional information required for the processing of DBS applications – including data relating to any sanctions and risk assessments.
- Payroll data including that pertaining to employment contracts, pay grades and salary ranges, and benefits such as pensions.

The personal data we may process in relation to pupils – applicable to Schools purchasing the EBP (work-based and work-related learning) and Music tuition services – includes:

- Pupils name, gender, date of birth and Year Group / academic year
- FSM status, CIC status and SEND status
- Unique pupil number (UPN)
- Details of instrument(s) your students play and any instrument(s) on loan to them (Music Service only)
- Results of internal assessments and external examinations (Music Service only)
- Photographs and video recording

SIPS Education Limited may collect personal information in a variety of ways. For example, data might be collected through application forms, obtained from passports or other identity documents such as driving licences; from forms completed by school employees at the start of or during employment; from correspondence with school employees; or through interviews, meetings, or other assessments.

Pupil data may be collected via correspondence with school employees, and from direct observations made, such as in the case of assessments and examinations within the Music service.

#### Why does SIPS Education Limited process personal data?

SIPS Education needs to process personal data in order to fulfil the requirements of a contract for services, purchased by the School (the Customer and Data Controller).

In some cases, whilst acting as a Processor on behalf of the School, SIPS Education Limited needs to process data to help the School to ensure that it is complying with its legal obligations. For example, the School is required to check an

employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

Similarly, some special categories of personal data, such as information about health or medical conditions, are processed by SIPS on behalf of the School to carry out employment law obligations (such as those in relation to employees with disabilities). Where SIPS Education Limited processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is for the purposes of equal opportunities monitoring. Data that SIPS Education Limited uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of deciding against this.

### The lawful basis for obtaining and using personal data

SIPS Education Ltd requires data in order to fulfil its contractual obligations with customers.

We will only process personal data where we have one of 6 “lawful bases” to do so under the General Data Protection Regulations:

- To fulfil a contract with you, or where you have asked SIPS Education to take specific steps before entering into a contract,
- For the legitimate interests of SIPS Education, provided the individuals' rights and freedoms are not impacted upon.
- To comply with a legal obligation
- To help to safeguard your vital interests
- To perform a task in the public interest
  
- Where you have freely given consent to use it in a certain way, for example, when we wish to take and use images. Consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn

Where the processing of data is necessary to comply with a statutory obligation such as ECT registration etc, or that forms part of a contract as SIPS Education as a third party i.e., HR support services, the processing of such data is consistent with the processing of other types of personal data.

## How we use this data

We use this data to:

- Comply with contractual/regulatory obligations
- Provide music tuition
- Administer HR support to our customers and their employees
- Manage applications for job vacancies for our customers
- Keep you updated with SIPS Education activities that are relevant to you
- Assess the quality of our services, courses, and programmes through evaluations

As part of our communication strategy, you will only receive marketing communication from us if you have 'opted in' to receive them, meaning that you have stated that you are happy for us to share such communications with you.

IT systems are used to monitor the effectiveness of our electronic communications with you. The data from this monitoring is generally used as a business database to inform profiling and business development.

## Photographs and video recording

As part of SIPS Education's activities (mainly within the Music Service), we will take photographs and record images of groups, ensembles, and individual performers. Such material will be used by SIPS Education for, publicity material to include flyers, brochures, displays at concerts, on our website and for social media purposes.

When using photographs and videos for publicity, display, or website purposes, we will not accompany them with any other personal information about the student to ensure that the student or learner cannot be identified. Consent to use photographs and video of individuals will always be sought from parents. Whilst we will carefully use images on the basis of consent, we recognise that there may be occasions where service users wish to not provide their consent or withdraw consent at a later time. In these circumstances, we will delete the photograph or video and not distribute it further.

We may on occasions also take photographic images for the purpose of publicity materials – for example, of attendees during training courses and conference events. We will make you aware of our intention prior to images being taken, ask for your consent, and explain how you can withdraw your consent.

## CCTV System

Customers visiting SIPS Education premises:

A Closed-Circuit Television (CCTV) system, is installed as part of our commitment to safety and security. We use the CCTV system fairly, within regulatory guidelines and law, with the personal privacy of individuals using the building and the objective of recording incidents for safety and security in mind. Security cameras are clearly visible and accompanied by signs indicating that CCTV is in use. SIPS Education operates a robust policy governing the use of the CCTV system; in case of queries, please contact our Data Protection Officer.

The communal areas of Guardian House, of which SIPS Education are located, have CCTV in operation, which is operated by the landlord, Bond Wolfe.

### Data sharing

We do not share personal information with any third party (unless otherwise stated in this privacy notice) without consent, unless the law requires us to do so.

Where it is legally required, or necessary to fulfil the contract for services (and complies with data protection law) we may share personal data with:

- The relevant Local Authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and ECT statutory requirements
- Partners undertaking joint activities
- Suppliers and service providers – to enable them to provide the services we have contracted them for
- Professional advisers and consultants
- Professional bodies
- Our auditors
- Central and local government. With regards to Work Experience such local governments include:
  - Derbyshire County Council
  - Dudley County Council
  - Telford County Council
  - Wolverhampton City Council
  - WEBP (Worcestershire Education Business Partnership)
  - Entrust Inspiring Futures.
- With regards to the Music Service, this includes sharing pupil data, through the Arts Council England, with the Department for Education (DfE).
- Police forces, courts, and tribunals

## Security of your personal data

SIPS Education Limited takes the security of your data seriously. SIPS Education Limited has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties.

We have appropriate safeguards in place (both in terms of our policies and procedures, and the technology we use) to keep your personal information as confidential and as secure as possible. We will always take steps to:

- protect data against accidental loss
- prevent unauthorised access, use, destruction, or disclosure
- ensure business continuity and disaster recovery
- restrict access to personal information
- train staff and contractors on data security
- manage third party risks, through use of contracts and security reviews

Your data will only be accessible to authorised staff. We will ensure, as far as reasonably possible, that any third parties we use for processing your personal information will do the same. The secure database we use to store your data is kept in the UK and this data is not transferred to or stored at a destination outside the European Economic Area.

## For how long does SIPS Education keep personal data?

Information will be stored only for as long as it is needed or required by statute and will be disposed of appropriately. As part of the recruitment process, data will be held for a period of 6 months for unsuccessful candidates. At the end of a contract for services, a copy of the data held by SIPS will be returned to the School, and the SIPS copy deleted.

On certain circumstances SIPS may have a legal obligation to retain certain personal data for a defined timeframe; for example, that relating to the assessment of Early Careers Teachers, which SIPS is obliged to retain for a period of six years. At the end of this timeframe, such data will be deleted from SIPS systems.

We undertake to report any personal data breaches in accordance with the General Data Protection Regulation requirements.

## Your Rights as a Data Subject

Data subjects have the following rights with regards to their personal information,

as follows:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purpose of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- Where relevant, the existence of the right to request rectification, erasure, or restrictions, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual
- The safeguards provided if the data is being transferred internationally

Data Subjects also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed

### [Subject Access Requests](#)

In the majority of cases, SIPS Education will be acting as a Data Processor on behalf of the School. In such instances, SIPS will support Schools in responding to Subject Access Requests and should a SAR be received directly by SIPS, we will liaise with your nominated Data Protection Lead, in order for the School to make the response to the requestor.

In instances where SIPS is acting as the Data Controller, Subject Access Requests will be responded to directly, to the individual making the request. A request can be made verbally or in written format and should be directed to SIPS' Data Protection Officer (DPO).

SIPS Education is registered as a Data Controller with the Information Commissioner. The Director for Corporate Risk Management, Laura Hadley is the Data Protection Officer for the Company. The Deputy Data Protection Officer for the Company is the Service Manager for Safety Management Services, Amanda Moore.

You can contact the DPO via [dpo@sips.co.uk](mailto:dpo@sips.co.uk)

### Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact our Data Protection Officer or Deputy Data Protection Officer, as noted above.

You can also report a concern online to the Information Commissioners Office at <https://ico.org.uk/concerns>

Telephone Number 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF 12.

### Changes to this privacy notice

This privacy notice may be updated from time to time. We encourage you to check this privacy notice periodically to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example, how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).