

The Speech Sign and Song Club (we) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulations May 2018 (“the GDPR”) and any replacement or amending legislation, the data controller is The Speech Sign and Song Club.

Our nominated representative for the purpose of the Act is Wendy Prevezer, who may be contacted at: speechsignsong@gmail.com

1. About us

We are The Speech Sign and Song Club (“the group”). Our e-mail is speechsignsong@gmail.com. We are a community based not for profit organisation.

Our group provides weekly/monthly music sessions to children. Application forms are completed by parents/carers in advance of joining the group. The information collected in those application forms will be used to help tailor the group sessions and ensure that they are in accordance with the physical and emotional needs of the attendees - please see the table at Section 5 below.

If you are using our website with the intention of becoming a volunteer with the group, or a committee member (“volunteer”), we will use the information collected to send you an application form, which we will then use to help assess your suitability in becoming a volunteer - please see the table at Section 5 below to see what this entails.

2. What is the purpose of this privacy statement?

This privacy statement tells you what to expect when the group collects personal data. It applies to information we collect about:

- visitors to our website
- people who enquire about, apply for and use our services
- people who are referred to us by other persons, agencies, organisations
- people who apply to become volunteers or committee members with the group

3. What is personal data?

Personal data means any data which can be used to identify an individual (such as name and address) and any information that relates to that individual from which they can be identified (for instance, details of the services provided to a particular individual). The following types of personal data may be used by The Speech Sign and Song Club:

- personal details
- family details
- employment and education details (volunteers)
- visual images, personal appearance and behaviour
- physical or mental health details
- religious or other beliefs of a similar nature
- information about your child's development, particularly relating to social and communication skills and needs

4. How is your personal data collected?

We use different methods to collect data from and about you, including data obtained via:

- Direct interactions.

You may provide your identity details, and contact details by filling in forms on our website, or by text or e mail.

- Online.

The computers which host our website maintain site logs which include the IP details of all machines accessing our pages. They only use such logs to determine website usage and not as a means of identifying or obtaining information about specific users. Any IP information is treated as strictly confidential and is not published or divulged to any third party.

- Photographic images

Images of individuals are treated as personal data. When taking photographs intended for publication on our website or elsewhere, it is our policy to seek the written permission of any individuals or their parents/carers who are photographed.

We will respond promptly to any request to remove photographic images and/or personal data from the website.

It is important that the personal data we hold about you is up to date. Please keep us informed if your personal data changes during your relationship with us.

5. Information we collect from you, and why that information is collected

The table below sets out the activities undertaken by the group, the type of data which may be collected for those activities to be undertaken, and the lawful basis on which the group processes that data.

For full definitions of the lawful bases for processing as set out in the GDPR, please see the glossary attached to this privacy statement.

Purpose/activity	Type of data which we may collect	Lawful basis for processing including basis of legitimate interest
To allow you to register interest in the group or apply for a place in the group or on one of the training events offered by the group	<p>Name of parent/carer</p> <p>Name of child</p> <p>Contact details</p> <p>Information on medical conditions of the child if formally diagnosed, or health concerns as noted by parent/carer as relevant to their attending the group (*)</p> <p>Communication levels/skills of the child (*)</p>	<p>To provide you with access to the Speech Sign and Song Club (“contract”)</p> <p>You have asked us to provide the service to your child, by requesting a place in the group (“legitimate interests”)</p> <p>To safeguard the children in your care while they are attending a session being run by the group (“legal obligation”)</p>
To allow potential volunteers or committee members (“volunteers”) to join the group	<p>Name of volunteer</p> <p>Contact details</p> <p>Details of referees (name/contact details) and their associated reference</p> <p>Education and employment history</p> <p>Health conditions which may impact of their ability to help out in the group (*)</p>	<p>To ensure that the group sessions have sufficient adult support to run effectively and safely (“legitimate interests”)</p> <p>To safeguard the children in your care while they are attending a session being run by the group (“legal obligation”)</p> <p>To protect the standards and reputation of the group by ensuring all volunteers are suited to and capable of undertaking the role for which they have applied (“legitimate interests”)</p>
<p>To manage our relationship with you, which may include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to give feedback about the group and its impact on your child</p>	<p>Name of parent/carer, and emergency contact</p> <p>Name of child</p> <p>Contact details</p>	<p>To provide you with access to, and the most up to date information on the Speech Sign and Song Club (“contract”)</p> <p>To keep our records up to date and ensure that the group continues to meet the needs of the children on roll (“legitimate interests”)</p> <p>To comply with our legal duty to keep you informed (“legal obligation”)</p>
To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<p>Name of parent/carer</p> <p>Name of child</p> <p>Contact details</p> <p>Technical data</p>	<p>To run the group, for provision of administration and IT services, network security, and to prevent fraud (“legitimate interests”)</p> <p>To comply with legal requirements (“legal obligation”)</p>

(*) - The data marked (*) is noted as “special category” data under the terms of the GDPR. We hold special category data – in particular details of the medical conditions of the children in our groups – in order to provide our service and to comply with safeguarding requirements.

It should also be noted that since we are a not-for-profit group that provides tailored services which are requested by and designed to meet the needs of those attending the sessions, we do not specifically rely on consent as a lawful basis for holding personal data including special category data.

6. Sharing your information

We will only share your information if:

- We are legally required to do so, which is most likely to be in the area of safeguarding.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our classes;
- We are working with carefully-selected partners that are carrying out work on our behalf. These partners may include cloud-based back-up systems, accountancy, Paypal and IT support specialists. The kind of work we may ask them to do includes processing card payments. We only choose reputable partners we can trust.

7. How long do we keep your personal information?

We maintain information in accordance with our Records Management and Retention Policy which specifies timescales for how long we hold your information. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of any legal, accounting, or reporting requirements. In some circumstances you can ask us to delete the data we hold about you. Please contact Wendy Prevezer at the e mail address shown at Section 1 above for more information.

8. What if I have any concerns about the use of personal data or its accuracy?

If you have concerns about the use of your personal data by the group, or its accuracy, you may contact us at the e mail address shown at Section 1 above.

9. Storing your personal information

We may transfer the information to other reputable third party organisations only as explained above. We may also store information in paper files.

We place a great importance on the security of all personally identifiable information associated with our supporters and users.

We will take appropriate steps to make sure we hold records about you in a secure way, including:

- all paid session leaders, volunteers and committee members who have access to your personal data or are associated with the handling of that data are obliged to respect the confidentiality of your personal data
- we have put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. This includes, but is not restricted to: the use of restricted access password protection, the use of anti-virus protection software, encryption of data and the performance of regular back ups.
- We have put in place procedures to deal with any suspected or actual personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- Unfortunately, the transmission of data across the internet is not completely secure, and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

10. What rights do you have in relation to your personal data?

You have a number of rights in relation to your personal data under data protection legislation.

- **right to find out about personal data we hold and ask for a copy of it (subject access request)** - you can ask us whether we hold your personal data and can request a copy of the information we hold
- **right to request correction of the personal data we hold**
- **right to request restriction of processing your personal data**
- **right to withdraw your consent** – if you have provided us with consent for use of your data, for instance, marketing purposes, you have the right to withdraw your consent to stop the further use of your data for that purpose. This right may not be available where use of your data is not reliant on obtaining consent, for instance, compliance with a legal obligation
- **right to object to use of your information which is likely to cause substantial damage or distress** – you may object in writing to us explaining why such use of your data is likely to cause you damage or distress and what should be done to prevent this. This right is not automatic and the use of your personal data for purposes you disagree with may be justified in certain cases even if it causes you some damage or distress
- **right to refer to the Information Commissioner's Office** - for independent advice about data protection, privacy and data sharing issues, or if you are still dissatisfied with how The Speech Sign and Sing Club have handled a complaint about use of your data, you can write to the Information Commissioner's Office at the following address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Or email: casework@ico.org.uk.

- **You do not have to pay a fee to access your personal data.** We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with a request made under these circumstances.
- **We endeavour to respond to all legitimate requests within one month.** Occasionally this may not be possible, in which case, we will notify you and keep you updated.

11. Changes to this privacy statement

This privacy statement was last updated in May 2018.

Any changes we may make to our privacy statement in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy statement.

12. Other important information

Social media sites

We operate a social media page on Facebook. This policy does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

GLOSSARY

The following are the lawful bases for processing, as out in Article 6 of the GDPR. At least one of these must apply whenever personal data is processed:

- (a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) **Vital interests:** the processing is necessary to protect someone's life.
- (e) **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)