

# PRIVACY STATEMENT

## RCM Junior Programmes

### Purpose

This privacy statement is intended for applicants, participants, students and their parents or guardians at the RCM Junior Programmes (RCMJP)<sup>1</sup>

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

The RCM needs data in order to fulfil its contractual obligations with applicants, offer-holders, participants, students (or their parents or legal guardians) in order to provide them with the education for which they or their children have applied. Parents or guardians with children under the age of 13 will act on behalf of their children. Children over 13 years of age are deemed competent to understand this privacy statement.

Article 6 of the EU GDPR Regulations concerns the “Lawfulness of Processing” and the following definitions provide the RCM’s legal bases for processing data:

6(1)(a) a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract<sup>2</sup>

6(1)(c) – Processing is necessary for compliance with a legal obligation

6(1)(d) processing is necessary in order to protect the vital interests of the data subject or of another natural person

### Where did your data come from?

The RCM will use the information you provided in the on-line application or registration form and may supplement this with information provided following an initial application.

### Why do we need your data?

- To manage the application and audition process.
- To manage offer-holders’ transition from applicants to students.
- To manage students’ registration, participation in, and progression through the RCM Junior Programmes.
- To meet our legal obligations relating to child protection and safeguarding.

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<sup>1</sup> <sup>1</sup>For the purposes of this Privacy Statement, references to the RCM Junior Programmes should be understood to include the activities of the RCM Junior Department and the RCM Sparks outreach programme.

## What we do with your data

We store your data on secure administrative systems all of which are password protected and access restricted to those RCM staff who need it.

We will use your data to schedule your audition, taking into account any special requirements or needs you may have told us about.

We will use your data as the basis for your student record, should we decide to offer you a place or an opportunity to participate in an RCM Junior Programme.

We will use your data to communicate with you information about relevant events offered by the RCM, where you have given the necessary permission on your application or registration form.

The RCM Junior Programme does not use any automated processes to make decisions about individuals.

## When we share your data

The Junior Programmes team shares relevant data with other departments within the RCM - Human Resources, Finance, Box Office/Marketing and Development. Details of all data retention/management policies can be found [here](#).

When Junior Department students wish the RCM to enter them for an **ABRSM exam**, the RCM will provide some personal details (name, age etc) to the ABRSM.

The RCM Junior Department participates in the Department for Education's **Music and Dance Scheme** and as part of the administration of this Scheme the DfE may ask for copies of students' reports, which will include students' names.

The RCM may use your name and details of your performance biography in **concert programmes or promotional materials** for any performance projects in which you are involved. Additional consent will be sought from you if we propose to share any data with partner educational organisations e.g. Tri-borough Music Hub

We may also use images of you in promoting the RCM. Your image may be used in **video recordings** the RCM makes of its performances and events which are subsequently broadcast and made available for streaming. You were given the opportunity to agree (or otherwise) to the RCM using students' or participants' images as described above when you agreed to the terms and conditions in the Junior Department's registration form or indicated the appropriate choice on the RCM Sparks registration form.

The RCM will provide its **debt collection agency** with personal contact details of any student or parent/guardian of a student who has significant outstanding debts to the RCM. Personal data will be provided to the RCM's debt collection agency in cases where the RCM has exhausted its own procedures for pursuing a debt

Other than where noted, the **legal basis** for sharing data is where processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

We will share your details with **internal and external auditors** when asked to do so. As a publicly-funded organisation, the RCM is subject to audit and is required on occasion to give the auditors access to students' and their parents' details in order for them to report on the integrity of the RCM's processes. The auditors will not normally retain personal data once an audit is complete.

The RCMJP has particular responsibility for safeguarding the well-being of its students and has in place a **Safeguarding Children policy**. On occasions when the RCMJP has cause to investigate an incident of suspected abuse, it may be necessary to involve external agencies such the student's school, social services or the police which will include providing the name of the student concerned.

The **legal basis** for sharing data with these external organisations is where processing is necessary to protect the vital interests of a data subject (student) or another person.

**This privacy statement was last updated in March 2021**