

1. Obligation to comply

1.1 Divergent Drama is obliged to comply with the forthcoming EU General Data Protection Regulation (GDPR) and Data protection Act 2018 with regards to collection of emergency phone numbers, email addresses, any medical details and bank details and with regards to taking or publishing of photographs of children during workshops, holiday clubs, after school drama clubs, youth theatre or any other undertaking run by Divergent Drama. Divergent Drama will always try to act in the best interest of the students and, as far as it legally can, it will take parental preference into account where appropriate. This is also with regards to collection of data from self-employed facilitators and/or teachers working on behalf of Divergent Drama this includes collection of bank details, home address, NI numbers, DBS checks, UTR numbers and photographs.

2. The Rights of the Child

2.1 The new data protection legislation gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. This means most children Divergent Drama work with will not be considered to have adequate capacity to understand.

3. Parental preference

3.1 Where Divergent Drama considers that the child does not have the capacity or understanding to make such a decision Divergent Drama will act as it considers to be in the best interest of the child, and in doing so will take into account any stated parental preference.

3.2 In order to do this Divergent Drama will need to ask parents or carers to express a preference with regards the taking of photographs or filming. Parents or carers will be asked to sign a document in order for Divergent Drama to use these photographs or videos. Parents and Carers can ask Divergent Drama to remove photographs or videos of their child at any time.

4. Use of photographs and media

4.1 Photographs and media may be used for promotional purposes these include:

- Photographs on Divergent Drama websites.
- Photographs and media published on social media sites such as Twitter, Facebook and Instagram sites. Such sites can be accessed by the public and will therefore require monitoring.
- Photographs on promotional material which can include business cards, leaflets, flyers, posters and banners.

4.2 Divergent Drama will not name the children in the photographs.

4.3 Where consent is requested as explained in paragraph 3.2 it must be in line with GDPR e.g freely given, specific, informed, unambiguous, verifiable and properly documented.

4.4 In each case Divergent Drama will need to show that it has justification for sharing the data and that it has considered any safeguarding risks attached to such publications.

4.5 If consent is given photographs and media are shared securely with the company DMLK for the purpose of website design.

5. Use of Personal Data

5.1 Personal data may be collected from parents/carers, schools and workers. The personal data Divergent Drama collects is as follows:

- For parents and carers, if your child attends a drama club with Divergent Drama, a Saturday acting school or a holiday camp Divergent Drama will ask for an emergency phone number, email address and any relevant medical details this is to ensure the safety of your child.
- On the rare occasion and for refund purposes only Divergent Drama may ask for bank details from parents or carers.
- For schools, Divergent Drama asks for a contact email on our booking forms.
- For workers Divergent Drama asks for a home address, bank details, DBS, NI number and UTR these are for staff administration and payment purposes.

5.2 Personal Data collected may be shared with facilitators/workers within Divergent Drama. Facilitators may print out hard copies of personal data for their club registers these include emergency phone numbers, children's names and emergency medical details.

5.3 Any hard copy personal data must be properly and securely disposed of when the data is no longer being used.

5.4 Personal data kept online can be kept indefinitely and may be used by Divergent Drama for advertising purposes.

5.5 Any individual or organisation reserves the right to access and correct the information that Divergent Drama holds about them or to have it removed.

5.6 Personal data is processed for the purposes of: staff administration, payroll, advertising, marketing and PR. All aspects of personal data use are directly related to Divergent Drama's business activities, accounts and record-keeping.