**PRIVACY POLICY FOR THE DANCE SCIENCE DEPARTMENT**

**Effective from the 25th May 2018**

The Dance Science department at Trinity Laban is committed to protecting your privacy. We respect your trust in us to use, store and share your information appropriately. The information below will explain how we collect personal information about you, how we use it and how you can contact us about it.

We try to keep this notice as simple as possible but if you have any questions or if any terms are unfamiliar regarding our Private Policy, please contact us as outlined below.

1. **DATA CONTROLLER**

* For the purpose of the Data Protection Act 1998 (DPA) and General Data Protection Regulation (GDPR), the Data Controller is Trinity Laban Conservatoire of Music and Dance (Trinity Laban or the Conservatoire). Our Registration Number in the Data Protection Public Register is Z6341141.

1. **DATA PROTECTION OFFICER**

* Our Data Protection Officer is the Director of Operations and Business Enterprise, Jonathan Peel, who can be contacted on 020 8305 4372 or at Trinity Laban Conservatoire of Music and Dance, King Charles Court, Old Royal Naval College, Greenwich, London SE10 9JF or [DataProtection@trinitylaban.ac.uk](mailto:DataProtection@trinitylaban.ac.uk).

1. **OVERVIEW**

This Policy is in addition to the Conservatoire’s Privacy Policy <https://www.trinitylaban.ac.uk/about-us/policies-and-freedom-of-information/privacy-policies>. This policy covers the collection, processing and other use of personal data under the Data Protection Act 1998 (“DPA”) and the General Data Protection Regulations (“GDPR”), that comes into force on 25th May 2018.

1. **Who is this Private Policy intended for?**

This policy notice is intended for:

1. Voluntary Research Participants.
2. Students and Clients who undertake Screening at Trinity Laban.
3. **Privacy Statement**

5.1 We developed this privacy statement to inform you how we use the personal data we collect from you

via paper records and electronically.

5.2 “Personal data” is information relating to an identified or identifiable natural person.

1. **LAWFUL BASIS FOr Processing**

There are six available lawful bases for processing data. No single basis is ’better’ or more important than the others. The Dance Science department has identified that its processing will fall under at least one of the following lawful bases set out in Article 6 of the General Data Protection Regulation (GDPR):

1. Consent
2. Legal Obligation
3. Vital interests
4. Legitimate Interests
5. **How we collect information about you**

We may collect your personal data in a number of ways, as outlined below:

* Consent forms
* Medical PAR-Q forms
* Research projects
* Emails from our encrypted network
* A third-party source i.e. National Institute of Dance Medicine (NIDMS)
* Telephone
* Injury Screening forms
* Medical history forms
* *Mind Body Online* - a website platform designed specifically for tracking client records and appointments

1. **Types of information we collect**

All staff within Dance Science department at Trinity Laban are very careful about the information we collect about you and we only collect necessary information to fulfil the task/study being undertaken. Below is a list of information that we may gather when conducting research or screening a client:

* Name, Contact Details, Date of Birth.
* Demographical information such as Ethnicity, Gender or Non-Gender, Race, Occupation.
* Previous Injury history.
* Medical history (only related to specific types of testing).
* Quantitative and Qualitative data from questionnaires, interviews (one-one), Focus groups, reports, surveys, software programmes, physiological tests, biomechanical tests.

1. **How we use information about you**

In general terms, we primarily use your personal information (including, where appropriate, sensitive personal information) to carry out academic research. You are not legally or contractually obliged to supply us with your personal information for research purposes, however, it is important that you are aware of how we use this information. Below is a list of examples, in which we may use your data:

* For research data analysis
* To maintain participant safety, dignity and wellbeing
* In publications or resources for research, education or public engagement purposes
* To maintain data for use in future research projects or research archives

The information that we collect and store relating to you is primarily used to enable us to provide our services to you, and to meet our contractual commitments to you.

1. **How we store you personal data**

Different methods exist for collecting research data and client data. For this reason, only authorised personnel have access to read, edit or use your data. The Dance Science department implements strategic safeguard measures to help reduce any breach of an individual’s personal data. We store information in the follow ways:

**Hard copies -** such as interview notes, prints of photographs, or video or audio tapes are kept securely locked away - for example in a locked filing cabinet that can only be accessed by agreed members of the research team.

**Files - including computer files - that contain personal or identifiable data (such as names)**- These files are encrypted and/or password protected and can only be accessed by agreed members of the team. Storage of anonymised files are always password protected and follow the same regulations as a normal file.

**Software Programmes**- information collected and stored on various software programmes are password protected where possible and are created as anonymised files.

1. **How long we store your personal data for and why**

The Dance Science department at Trinity Laban recognises that research data collected is a fundamental component of any research project involving staff and/or students. The department will securely hold all necessary research data for a minimum of 10 years from completion of the work. Some data may be used retrospectively for analysis and the researchers who gathered or processed that data may reuse it in future research. In this case, we may store your data for up to a maximum of 25 years. You will be advised further about the long-term use (and, where applicable, re-use) and retention of your personal data in connection with the specific research study or project you are participating in. Sensitive data may be destroyed if they are deemed to have no long-term value, or due to ethical requirements.

1. **SHARING YOUR PERSONAL DATA**

Any participant who volunteers for a research project may have their information shared within the research team conducting the project. This is so that they can identify you as a participant and contact you about the research project if necessary. All our researchers are asked to de-identify or delete Personal Information collected as part of their research at the earliest opportunity where it becomes clear that any information held is not necessary to achieve the research project objectives, or it is clearly inaccurate. The information cannot be used to contact you or to decide something in relation to you that might affect you.

In addition, students and clients who undertake screening within Trinity Laban may receive services from a multi-disciplinary team which includes:

1. Exercise Physiologist
2. Physiotherapist
3. Strength and Conditioning (S&C) Coach

In order to optimise performance and plan programmes going forward, it may be necessary for one team member to share data with another team member e.g. the physiotherapist may share rehabilitation notes with the exercise physiologist and the S&C Coach to safely provide a working training programme. This data remains strictly confidential within the team.

**Data Sharing inside of the European union (EU) and European Economic Area (EEA) –** some research projects are a collaboration between different Universities in different countries of the EU and EEA. Appropriate safeguard measures are in place to accommodate such data sharing such as ensuring the universal private security networks between Universities.

**Data Sharing outside of the European union (EU) and European Economic Area (EEA) -** In most cases, your data will be processed inside the EU. Processing will, therefore, be compliant with the GDPR. When your personal data is shared outside the EU, the University will ensure there are adequate levels of data safeguards in place. In rare cases, your data may be transferred to the US. Such transfer is covered by the EU-US Privacy Shield framework and allowed by GDPR as providing adequate safeguards.

1. **Discolusre of information**

We may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection and minimise credit risk.

1. **your rights**

The DPA and GDPR give you the right to access information held about you by us. Below is a list of your rights as outlined by the new GDPR legislation:

1. Right to be informed - You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we’re providing you with the information in this Privacy Notice.
2. Right of access - You have the right to obtain access to your personal data. This is so you’re aware and can check that we’re using your personal data in accordance with data protection law.
3. Right to rectification - You are entitled to have your personal data corrected if it’s inaccurate or incomplete.
4. Right to erasure - This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal data where there’s no compelling reason for us to keep it.
5. Right to restrict processing - You have rights to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.
6. Right to data portability - You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing – You have the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent - If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

You have the right to exercise any of the rights described above at any time, and you must put this in writing. Please write to us by email if you wish to request confirmation of what personal information we hold relating to you. You can contact us at [DataProtection@trinitylaban.ac.uk](mailto:DataProtection@trinitylaban.ac.uk) or [E.Redding@trinitylaban.ac.uk](mailto:E.Redding@trinitylaban.ac.uk) or [S.Sinclair@trinitylaban.ac.uk](mailto:S.Sinclair@trinitylaban.ac.uk) and specify what personal data you are requesting. There is no charge for requesting that we provide you with details of the personal data that we hold. We will provide this information within one month of your requesting the data. Exceptions to timings may apply if large quantities of data are requested.

1. **Changes to this policy**

Please regularly review these policies to be informed of how we are protecting your personal data.

1. **contact**

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at Trinity Laban Conservatoire of Music and Dance, King Charles Court, Old Royal Naval College, Greenwich, London SE10 9JF. Email our Data Stewards [E.Redding@trinitylaban.ac.uk](mailto:E.Redding@trinitylaban.ac.uk) and/or [S.Sinclair@trinitylaban.ac.uk](mailto:S.Sinclair@trinitylaban.ac.uk).