

Nottingham Music Service Data Protection Policy

1. Introduction

Nottingham Music Service (NMS) is committed to ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). This policy outlines how we collect, process, store, and protect personal data while maintaining transparency and accountability in our data handling practices.

2. Scope

This policy applies to all employees, volunteers, contractors, and third parties processing personal data on behalf of Nottingham Music Service. It covers all personal data collected, processed, or stored in any format within our operations, including services for students, schools, and partners.

3. Principles of Data Protection

NMS adheres to the UK GDPR principles, ensuring that personal data is:

- Processed lawfully, fairly, and transparently.
- Collected for specified, explicit, and legitimate purposes relevant to NMS activities.
- Adequate, relevant, and limited to what is necessary for the provision of music education and related services.
- Accurate and kept up to date.
- Retained only for as long as necessary for educational and operational purposes.
- Processed securely to maintain confidentiality and integrity.

4. Lawful Basis for Processing

NMS ensures that personal data is processed only when there is a lawful basis, such as:

- Consent from the data subject (e.g., parents, students, staff).
- Performance of a contract (e.g., service agreements with schools and partners).
- Compliance with a legal obligation (e.g., safeguarding requirements).
- Protection of vital interests (e.g., emergency medical information).
- Legitimate interests pursued by Nottingham Music Service (e.g., marketing communications for our events and the wider service, where appropriate safeguards are in place).

5. Individual Rights

Under UK GDPR, individuals whose data is processed by NMS have the following rights:

- Right to be informed about data collection and processing.
- Right of access to their personal data.
- Right to rectification of inaccurate data.
- Right to erasure ('right to be forgotten'), where applicable.
- Right to restrict processing.
- Right to data portability.
- Right to object to processing, including marketing communications.
- Rights related to automated decision-making and profiling.

6. Data Security

Nottingham Music Service implements technical and organisational measures to safeguard personal data against unauthorised access, loss, or destruction. This includes encryption, secure storage solutions, role-based access controls, and regular security assessments.

7. Data Sharing and Transfers

Personal data is only shared with third parties when necessary and in compliance with UK GDPR. This may include schools, funding bodies (National Arts Council, Department of Education), and service providers supporting NMS operations. Any data shared with third parties is anonymised unless there are safeguarding issues that need to be addressed. Where data is transferred outside the UK, appropriate safeguards are applied, such as Standard Contractual Clauses (SCCs) or an adequacy decision.

8. Data Breach Management

NMS has a data breach response plan in place. All breaches are assessed, documented, and, where required, reported to the Information Commissioner's Office (ICO) within 72 hours. Affected individuals are notified where necessary.

9. Accountability and Governance

To ensure compliance, NMS maintains records of processing activities, conducts Data Protection Impact Assessments (DPIAs) where required, and appoints a Data Protection Officer (DPO) if necessary. Employees and volunteers receive regular data protection training to uphold compliance standards.

10. Policy Review

This policy is reviewed regularly to ensure alignment with legal and regulatory requirements. Updates are communicated to all relevant stakeholders within Nottingham Music Service.

For any questions or concerns regarding this policy, please contact our Data Protection Officer at:

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