

GDPR Audit

Completed May 2018, last updated June 2021

Completed to comply with General Data Protection Regulation (GDPR) and to inform the GDPR Policy (See Safeguarding Policies document).

Rebecca Ashton, as business owner, is the controller of this data and can be contacted for further information. She is also the Data Protection Officer. Franchisees are responsible for their own GDPR Audit, because, as they own their business, they are controllers for that business, but they can use this as an example for their document.

Further support has been sought from Snapwire, the company who designed SOMP (our Secure Online Management Portal). SOMP is supported by Microsoft.

Staff members working for The Right Step Dance Company are freelancers and are therefore responsible for their own GDPR compliance. When signing their contracts they agree to uphold and abide by The Right Step's policy and procedure documents and as such they are also responsible for keeping personal data safe as stated in the TRS GDPR policy.

| What Data do we collect? | How is this data collected? | Who has access to this data? | Where is this data stored and how is it protected? | Why do we collect this data? What is its function? | How long is the data kept for? | Relating Authority and / or Legislation | What is the process if someone asks for their data to be removed? |
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| Staff Information (See list on SOMP) | In person, via email, over the phone or in another way. However the staff member would like to provide the information. | Controller, office staff members, organisations in specific circumstances and when further permission has been sought from the relevant staff member. | On SOMP (Secure Online Management Portal) and, if printed, in a locked cabinet. | Contact details are needed to keep in touch with staff members. The information is also required as proof of eligibility to work in the UK and as proof that the staff member has the required training and experience to fulfil their role. | For five years after the staff member has finished working for the company | DBS Code of Practice: The following basic information should be retained after the certificate is destroyed: the date of issue; the name of the subject; the type of disclosure; the position for which the disclosure was requested; the unique reference number; and the details of the recruitment decision taken HMRC Companies Act 2006 | It will be deleted from SOMP and any printed documentation will be shredded, however, there is information that must be kept if that member of staff is still working for the company. (see function column) and the HMRC's recommendations will be taken into account. |
| Emergency Contact Information (1 or 2 persons per staff member) | In person, via email, over the phone or in another way via the relevant staff member. It is the responsibility of the staff member to ensure their emergency contact(s) has given permission for TRS to hold their | Controller, office staff members In cases of emergency this information may be passed onto organisations and / or medical professionals. | On SOMP (Secure Online Management Portal) | This information is needed in case of emergency. | For two years after the staff member has finished working for the company. This is necessary because often staff members come back to work after a break and we need to keep this information until all of their sessions | | It will be deleted from SOMP, however, this may leave the staff member without an emergency contact, in which case they will likely want to provide another. |

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| | information. | | | | and / or work they were involved with has been completed and passed onto the new member of staff successfully. | | |
| Staff Bank Details and / or other payment information | Staff give this information without being asked, on the invoices they send us. | Controller, office staff members, the bank (currently Lloyds) | In email (Outlook) and, once printed, in a locked cupboard. | So that invoices can be paid. | Up to 8 years (in line with HMRC tax regulation) | | The personal bank details would be removed from the invoice, but the main information from the invoice must be kept in line with HMRC regulation. |
| Participant and parent / carer information on enrolment forms | Via a paper form filled in by participants and handed to their dance teacher or via Bookthatin.co.uk | Controller, office staff members, TRS Teacher, possibly organisation staff if participant, parent / carer hands form to them or bookthatin software (not a person), controller, office staff members, TRS Teacher and, occasionally the organisation where necessary. | Once it arrives in the office, in a locked cupboard. Before then, the participant trusts the person they hand it to (organisation or TRS Teacher) to keep their information safe or on bookthatin hosted by Azure (Microsoft) securely and in compliance with GDPR. | For the safety and safeguarding of participants. | Whilst the participants is taking part in the class. | | They will not be deleted or shredded until the data has been kept for as long as is necessary. Once this time has been reached they will be deleted or shredded anyway. |
| Participant and parent / carer information on merchandise forms | | | | So that we can keep track of orders and stock and to ensure the correct person receives the correct thing. | Until August following order completion. | | |
| Participant and parent / carer information on consent forms for recorded images | | | | So that we may have record of permission to take and use photographs (see recorded image policy) | For 19 years or until a child is 21 or until the recorded image is no longer in use. | | |
| Accident Report Forms | Via a paper form completed by a staff member | Controller, office staff members, TRS Teacher, possibly | Once it arrives in the office, in a locked cupboard. | | For 3 years for adults and staff members. | Normal limitation rules (which mean that an individual | |

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| | | organisation staff if appropriate | Before then the staff member who filled in the form must keep it safe. | | For 19 years or until a child is 21. | can claim for negligently caused personal injury up to 3 years after, or deliberately caused personal injury up to 6 years after the event) are postponed until a child reaches 18 years of age. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (as amended) | |
| Safeguarding and other Report Forms | Via a paper form completed by a staff member or via an emailed, attached document. | Controller, office staff members, Safeguarding Officer TRS Teacher, possibly organisation staff if appropriate | Once it arrives in the office, in a locked cupboard. Before then the staff member who filled in the form must keep it safe. OR on the Controller's and Safeguarding Officer's computer. | | 22 years (or until the child reaches 24 years) | | |
| Interested parties' information for Mailing List | Via Mailchimp sign up form or, in rare cases, manually when requested or on bookthatin.co.uk | Controller, office staff members, Mailchimp, bookthatin.co.uk | On Mailchimp's secure or bookthatin.co.uk hosted by Azure (Microsoft) | So that we can send the people on the list our newsletter and information that interests them. | Until they ask to be removed | | Their information will be removed from our list. |

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| Meeting Minutes | Typed or handwritten during meeting | Controller, office staff members | On password protected computer | Names are used to identify those present, actions etc. | 10 years after the date of the meeting | Companies Act 2006 | Personal information pertaining to that person can be deleted or made anonymous. |
| Franchisee Information | In person, via email, over the phone or in another way. However the franchisee would like to provide the information. | Controller, office staff members | On SOMP (Secure Online Management Portal) and, if printed, in a locked cabinet. | Contact details are needed to keep in touch with franchisees. The information is also required as proof of eligibility to work in the UK and as proof that the staff member has the required training and experience to fulfil their role. | For one year after a new franchisee has taken over their territory or until any legal circumstances have been resolved. This is necessary because we need to keep this information until all of the work they were involved with has been completed and passed onto the new member franchisee successfully. | | It will be deleted from SOMP and any printed documentation will be shredded, however, there is information that must be kept if the franchisee is still running their franchise. (see function column). |