



Data Protection Policy

Policy Management

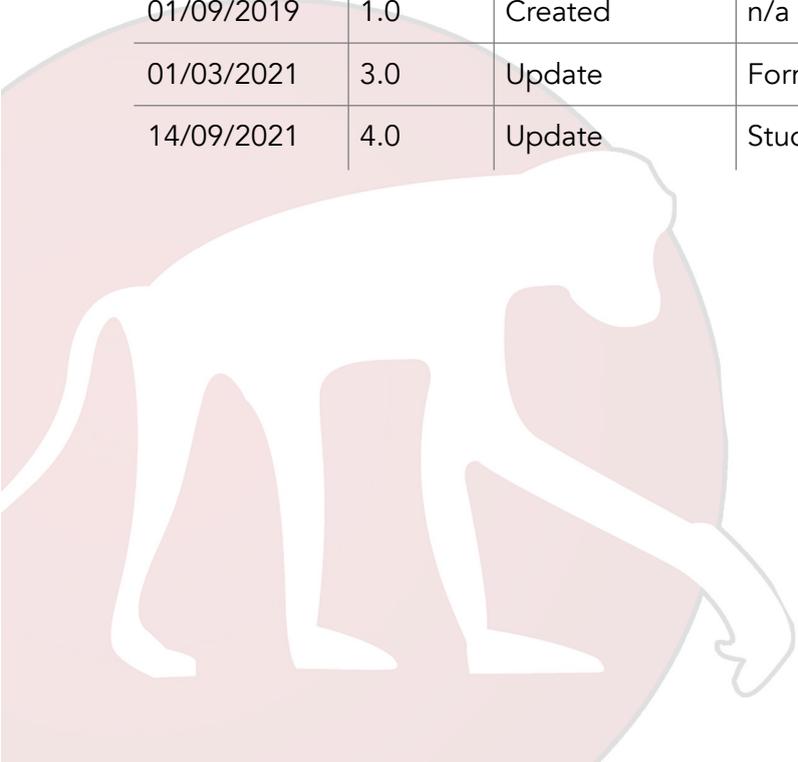
Policy Scope:	Fourth Monkey full-time accredited and vocational courses
Policy Application:	All students on accredited and vocational courses at Fourth Monkey
Policy Availability:	https://www.fourthmonkey.co.uk/policies/
Policy Manager:	Jonne Damhuis, Operations Co-ordinator
Policy Approval:	Steven Green, Artistic Director & CEO Charleen Qwaye, Head of Training & Deputy CEO

Document Control

Policy Implemented:	September 2019
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Policy Storage:	Office Shared Drive/ Policies
Related Documents:	N/A

Version Control

Date	Version	Action	Amendment	Staff
01/09/2019	1.0	Created	n/a	CQ
01/03/2021	3.0	Update	Format & Policy Manager	JD
14/09/2021	4.0	Update	Student Welfare addition	JD

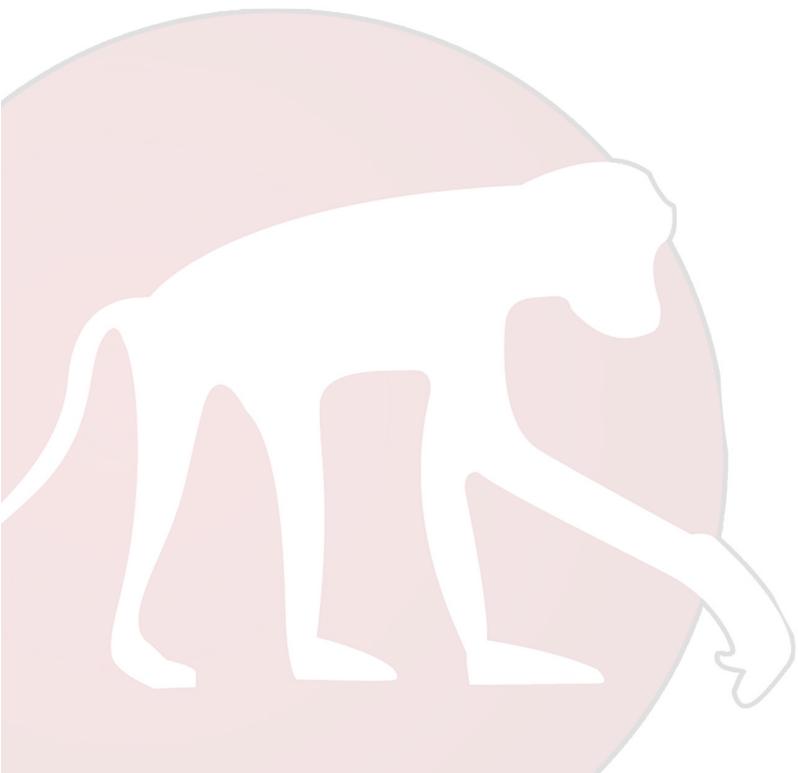




Fourth Monkey
Actor Training Company

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Fourth Monkey

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1. Aim

Fourth Monkey Actor Training Company, known as Fourth Monkey, is committed to maintaining your confidence and trust in protecting the privacy of your information and personal data.

Accordingly, Fourth Monkey maintains the following policy, adhering to the following legislations: UK Data Protection act 1998 and the EU General Data Protection Regulation 2016/679 (GDPR).

This policy is in place to ensure Fourth Monkey complies with data protection law and good practice, is transparent about how and why we store data and protects the rights of service users, staff and other relevant bodies.

2. Collecting Personal Information

We collect relevant information from staff, practitioners, students, venue hirers, short course participants, ticket sales, industry members. The information we collect typically falls into the following categories:

Students: Name, address, contact information (telephone number, email address), date of birth, gender, as well as specific categories of data such as medical/health issues, emergency contact
This information will be collected using paper forms and then kept for up to two years.

Staff (including interns and work placements) and practitioners: Name, address, contact information (telephone number, email address), date of birth, gender, emergency contact, as well as relevant financial information.

This information will be collected using paper forms.

Venue hirers: Name, company name, address, contact information (telephone number, email address), as well as relevant financial information.

This information will be collected using paper forms and then kept digitally for two years, by the Building Coordinator.

Short course participants and ticket sales: Name, contact information (telephone number, email address), as well as relevant financial information.

This information will be collected using appropriate online forms and then kept digitally for a year, by the Building Coordinator.





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CCTV

Fourth Monkey has several cameras installed throughout the building for security reasons. This footage can only be accessed by authorised personnel, and is installed on a password protected computer with restricted access. Signage is present to indicate to use of CCTV. Footage will only be given out if there is the legal requirement for it.

Security

Fourth Monkey works on a double buzzer system, so only people who are scheduled to be in the building will gain access. Students and staff will be equipped with a electrical fob registered to their name, which will allow them entrance to the building without having to buzz in. Fobs will be wiped of personal data when the relevant person leaves our programme.

External bodies and practitioners will have to buzz in and state their name/group name, or who they're here to see. Once they're in the building, they will be asked to sign in with their name and company name. Pages from the sign in book will be destroyed once the sign in date is further back than a year.

Consent

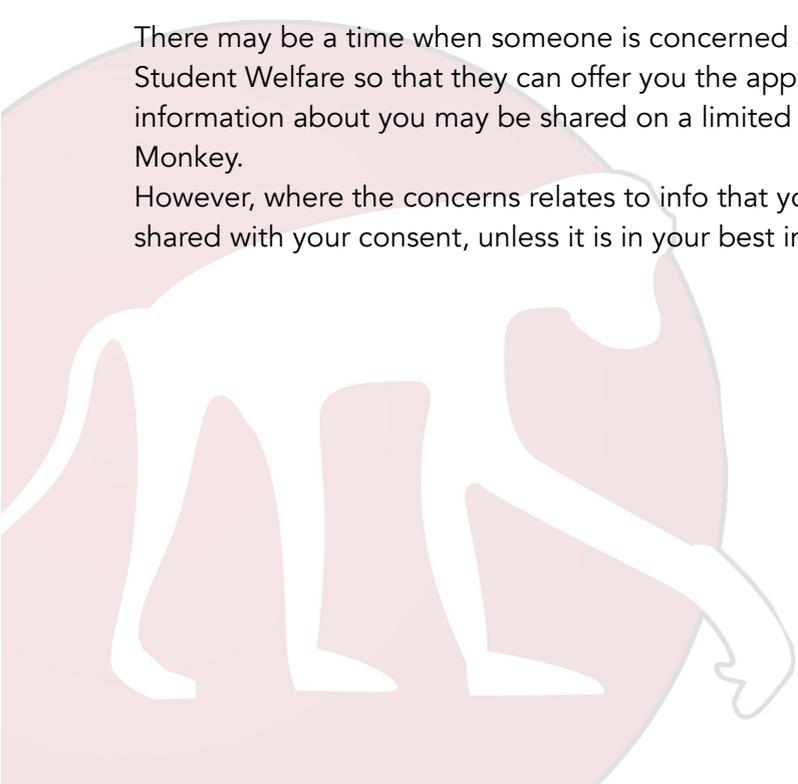
Fourth Monkey obtains consent for any information held for reasons other than to comply with legal requirements. This includes signed and dated data, opt-out consent for mailing lists, signed and dated staff data.

We will detail how to unsubscribe from a mailing list in each mailing list communication.

We will make clear the intended purpose of stored data, and what data is being collected, when the data is being obtained and consent given. Consent only applies to the stated purpose; should we require data for a different purpose, we will seek and obtain specific consent again.

There may be a time when someone is concerned about you and wishes to share their concerns with Student Welfare so that they can offer you the appropriate support. In these circumstances information about you may be shared on a limited basis with the appropriate people within Fourth Monkey.

However, where the concerns relates to info that you have disclosed in confidence this will only be shared with your consent, unless it is in your best interest or there is a public interest to do so.





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3. Use of Personal Information

The data that Fourth Monkey collects from individuals is used for administrative purposes, such as complying with employment law, when there is need to have access to students personal files and for the purpose of providing information about relevant services, such as new short courses, upcoming productions or offers.

We need to process information about you for the following reasons:

- **Contractual purposes:** To provide the training you have requested, communicate with you about this activity, changes to our conditions of enrolment and to process payments.
- **Legitimate interests:** To meet the legitimate aims of the school and ensure you are well supported and safe whilst participating in training. This includes:
 - Carrying out any relevant risk assessments: Some individuals may present with a medical condition that may present a risk of harm when participating in training. It is vital that you share any relevant medical information.
 - Identifying any reasonable adjustments and adaptations to support inclusion: If you have a disability or any special needs, we will review the information you have provided to help us identify any actions we are able to take to support inclusion.
 - Responding to any comments, questions or complaints you may send us.
 - Maintaining class attendance records and contact details for emergency purposes which is shared with relevant practitioners only.
 - Filming and taking photos for training purposes and/or to promote the school on our website, social media account and in communications. All film and photos will only be published in line with our safeguarding policy.

You have the right to object to any of the above uses of your information by contacting us.

- **Legal reasons:** To comply with applicable laws and protect legitimate interests and legal rights. This includes, but is not limited to the use of your information relating to legal claims and compliance and regulatory activity.
- **Marketing:** With your consent we may send you information by email about school news, activities, products and opportunities that we think will be of interest to you. You can ask us to stop sending you this information at any point by contacting us.

We will not share your information with any other organisations except with your consent or in exceptional/emergency circumstances where we believe that the sharing of information about you is vital to protect you.



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4. Storing Personal Information

Fourth Monkey strives to ensure all personal data is protected from any unauthorised access, accidental loss or damage.

An individual's personal information is stored on secure servers and password protected computers, where possible sensitive data will be limited to a single computer. Paper data will be filed in a locked filing cabinet inside a secure office. Any computers holding personal data are password protected and have restricted access. Access to personal information is limited to specific staff members only.

Individual rights

You have the right to see the personal information we hold, you can request a copy by writing to us. If we do hold other information about you, you can ask us to delete it or correct any inaccuracies. We will either make the requested amendments or provide an explanation as to why we are not making changes.

Once you finish our course, your information will remain on our database and we will inform you, by email only, of any relevant products and opportunities that we think will be of interest to you. You can ask us to stop sending you this information at any point by contacting us or by unsubscribing directly from the email you receive.

Retention

Student Data will only be held for a period of two years before being destroyed and new data and consent being obtained, unless an individual requests for their data to be removed sooner, in which case if able, it will be destroyed.

Staff Data will be held and maintained for a duration that complies with tax and employment laws, currently this period is seven years.

Venue hire data will be held for a period of a year before being destroyed and new data and consent being obtained, unless the period the agreement covers exceeds the year.

Anonymised feedback will be held indefinitely for as long as we need it, unless a request to remove it is received.

When data is no longer required, it will be securely deleted or destroyed. Any sensitive data that can't be destroyed in conventional ways will be destroyed using confidential waste.

Any breach of data will be immediately reported to the Information Commissioner's Officer (ICO).



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Lead responsibilities for compliance with the Data Protection Policy and procedures rests with Fourth Monkey. Implementation of this policy and day to day management of data will be carried out by a designated Data Protection Officer.

For office use only	
Data Protection Officer	Jonne Damhuis
Relevant Legislation	UK Data Protection Act 1998 EU General Data Protection Regulation 2016/679

