RSC Nursery Privacy Policy

About This Policy

At the Royal Shakespeare Company we take your privacy seriously. We promise to respect any personal data you share with us and keep it safe.

This policy explains who we are, what information we collect, how and why we use it, how it is stored, how we fundraise, which partners we work with, and your rights regarding any information you share with us.

We will use any personal information we collect about you in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act, the Data Use and Access Act, and the Privacy and Electronic Communications Regulations. We aim to be clear when we handle your data, and not do anything you would not reasonably expect.

By visiting www.rsc.org.uk you are accepting and consenting to the practices described in this policy.

This privacy policy outlines how we process data for our:

- Children
- Parents/Carers/Guardians
- Emergency Contacts

It is important that parents read and retain this policy, along with any other privacy information we may provide when collecting or processing personal data. This helps you understand how and why we use your information, and what your rights are.

If you have provided us with personal information about family members or emergency contacts, please share this policy with them.

Who We Are

The Royal Shakespeare Company (ICO registration Z5023810) is the data controller for any personal information we process.

The Royal Shakespeare Company (RSC) is incorporated under Royal Charter and is a charity registered in England and Wales (Charity Number 212481).

RSC Enterprise Limited (CRN 2360172) is a private limited company that is a 100% owned subsidiary of The Royal Shakespeare Company that carries out a range of commercial trading activities to generate income for the RSC.

For this policy “RSC,” “we,” “us,” and “our” refer to the Royal Shakespeare Company.

Contact Us

Questions, comments, and requests about this Privacy Policy are welcomed.

Email: dataprotection@rsc.org.uk

Write to: Royal Shakespeare Theatre, Waterside, Stratford-upon-Avon, Warwickshire, CV37 6BB

You can also speak to the Head of Nursery who oversees data protection compliance.

Data Collection

We collect personal information when you:

- visit our website
- make an initial enquiry about enrolment
- enrol with the nursery
- attend nursery
- communicate with us by post, email, telephone, social media, via our websites, or in person
- visit our premises

Children:

We collect and use the following personal information:

- First name and last name
- Date of birth
- Gender
- Home address
- Registered GP
- Dietary requirements
- Attendance information
- Photographs (for activities, achievement displays, and development records)
- Emergency contact details should parents/guardians/carer be unavailable
- Learning records containing the work of the child, observations made by nursery staff about the child’s development, photographs demonstrating the child’s development, and specific examples of the child’s progress
- Care plans, common assessment forms, and speech and language referrals
- Accidents and injury records
- Records of any death, reportable injury, disease, or dangerous occurrence
- Observation, planning, and assessment records of children

- Name of future school

Sensitive Information

We may also collect sensitive information ("special category data") such as:

- Ethnicity, spoken language, nationality
- Religious or philosophic beliefs
- Health and medical conditions
- Accident and injury reports
- Incident reports
- Safeguarding and child protection records

Parent/Carers/Guardians:

We collect and use the following personal information:

- Title, first name, and last name
- Relationship to the child
- Contact details including postal address, email address, and telephone number(s)
- National Insurance number
- Bank details including account name, number, and sort code

Sensitive Information

We may also collect sensitive information ("special category data") such as:

- Ethnicity, spoken language, nationality
- Relevant conversations linked to safeguarding or the government's Prevent strategy

We may also collect health information if you have been involved in an incident, for example an accident, while at the RSC.

Emergency Contacts

We collect and use the following personal information:

- Title, first name, and last name
- Relationship to the child
- Contact details including postal address, email address, and telephone number(s) and child collection permissions

Sensitive Information

We may also collect health information if you have been involved in an incident, for example an accident, while at the RSC.

Use of data

We will use your information for the purposes listed below under one of the following lawful bases:

- Performance of a contract between us and you
- Your consent (where we need it)
- To comply with a legal obligation e.g., reporting contagious infections and diseases
- Our legitimate interests (except where such interests are overridden by the interests, rights, or freedoms of the individual)
- To protect someone's vital interests e.g., in a medical emergency
- Where it is in the public interest e.g., equal opportunities monitoring

We may process personal data without your knowledge or consent if required or permitted by law – for example, where there is a safeguarding concern.

The ways in which we use your data are listed below:

Children:

Purpose	**Lawful Basis**
To keep a record of their attendance	Legal obligation
Ensure we cater for any specific needs they may have such as allergies or dietary or access requirements	Consent
To support their learning and development	Legitimate interests
To maintain a record of their learning and progress	Legitimate interests
Share progress reports with parents and schools	Legitimate interests
Meet safeguarding and welfare requirements	Legitimate interests
To keep a record of incidents, accidents, or injuries	Legal obligation

Parents/Carers/Guardians

Purpose	**Lawful Basis**
Keep a record of the relationship we have with you and how you wish to be contacted	Legitimate interests
To process nursery fee payments	Performance of a contract

To report on your child's learning and progress	Legitimate interests
To inform you of any changes to our services	Performance of a contract
Investigating and responding to complaints or concerns	Legitimate interests

Emergency Contacts

Purpose	Lawful Basis
To keep a record of you and your relationship with the child	Legitimate interests
To contact you in case of emergency	Legitimate interests

Sharing Data with Third Parties

We may share your personal information with any member of our group, which means our subsidiaries, and our ultimate holding company and its subsidiaries.

We may disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data to comply with any legal obligation.
- To enforce or apply terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of The Royal Shakespeare Company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If the RSC or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

The personal data that we collect from you is held within the UK and/or European Economic Area (EEA). We use some suppliers who host data outside the UK. Where your data is transferred outside the UK, we will take all reasonable steps to ensure it is handled securely and in line with this Privacy Policy. This includes ensuring that appropriate safeguards are in place, such as approved data transfer agreements.

The ways in which we share data with third party organisations are listed below:

Type of Third Party	**Lawful Basis**
Emergency contact if there is an emergency and the parent/carer/guardian is unavailable	Consent

Third party processors providing services to the RSC e.g., Connect Childcare	Performance of a contract
Local authorities e.g., Warwickshire City Council for safeguarding and funding allocation purposes	Legal obligation (safeguarding) Legitimate interests (funding allocation)
Regulatory bodies e.g., Ofsted to provide records during inspections	Legal obligation
Health Protection Teams if we need to report contagious infections or diseases	Legal obligation
Emergency Services in the case of an urgent situation or medial emergency	Vital interests
Companies House, **Charity Commission**, our **auditors, and professional advisers**	Legal obligation
Funders such as Arts Council England for analysis and reporting purposes (anonymised data only)	Legitimate interests
Schools for transition and progress sharing	Consent
Analytics and **search engine providers** to help us with improving and optimising our websites	Consent
Social media	Legitimate interests

Keeping Your Data Secure

We take every precaution to protect your personal data, and we hold regular security reviews to ensure that the website is safe and secure for your protection.

Your data is processed and stored in secure systems and digital environments. Access to personal data is strictly controlled; only authorised and trained employees and approved contractors/developers are granted access to personally identifiable information. This will be from time to time, and only when they need to perform a specific job or task.

If we need to share personal data with a third party, we ensure that data sharing agreements are in place.

How Long We Keep Your Data

We keep personal information about you and your child for a maximum of 22 years only for as long as it is needed to meet the purposes we collected it for. This includes meeting legal, financial, and reporting obligations.

We document how long different types of personal data are kept in the RSC's Records of Processing Activities.

When deciding how long to keep personal data, we consider:

- The type and sensitivity of the information
- The potential risk of harm from unauthorised use or disclosure
- The reasons we collected the data and whether those purposes can be met in other ways
- Any legal requirements we must follow

In some cases, we may anonymise personal data so it no longer identifies you or your child. We may then use this anonymised information without further notice.

Once your child is no longer using the nursery's services, we will securely delete or destroy personal data in line with legal and regulatory requirements.

Giving you control

Your individual rights

Under data protection law, you have rights including:

- Your right of access: you have the right to ask us for copies of your personal information.
- Your right to rectification: you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure: you have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing: you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing: you have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability: you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

- Your right related to automated decision-making including profiling: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Where you have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us as set out at the beginning of this Privacy Policy. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to.

How to make a complaint

If you wish to make a complaint about how we are using your data, please email dataprotection@rsc.co.uk.

Where you take the view that your personal data is processed in a way that does not comply with the UK GDPR, you have a specific right to lodge a complaint with the Information Commissioner's Office (ICO). They will then inform you of the progress and outcome of your complaint. You can contact the ICO at:

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

Change to this policy

We may change or update this policy from time to time. Any significant changes will be communicated on our website or by contacting you directly.

Last updated date tbc