

**Hampshire County Council  
Hampshire Music Service Instrument Hire  
– Privacy Notice**

**Why do we collect and use this information?**

Hampshire County Council is the organisation responsible for processing your information (the Data Controller). Our Hampshire Music Service collects and uses information from you for the purpose of providing you with a musical instrument hire scheme.

We collect information about your child as well as information about you as their parent/carer. We hold this personal data securely and use it to:

- Identify whether a suitable instrument is available and communicate with you around the outcome;
- Set up the Instrument Hire Agreement Form;
- Manage enquiries from you around the hire scheme;
- Set up ongoing payments arrangements;
- Send out payment request reminders;
- Evaluate and improve our services; and
- Ensure compliance with our obligations under the accuracy principle of the General Data Protection Regulation (Article (5)(1)(d)), making sure our records about you are up to date.

The following sections provide further detail around the information we process setting out what allows us to do this (lawful basis), who we may share it with, how long we keep it for (the retention period), alongside identifying any rights you may have and who to contact if you think we're not handling your information in the right way.

**The categories of information that we collect, hold and share**

The following personal information is processed:

- your personal information (name, address, email, phone numbers);
- your child's personal information (name, date of birth, school name, year group, music teacher name) and characteristics (such as gender, ensemble/music centre name); and
- also information about the instrument.

**The lawful basis on which we process this information**

We collect, store, use and share the information ensuring that we comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA2018) requirements for processing through:

- Article 6(1)(b) - the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract (submitted an instrument hire request form).

Under this lawful basis we do not require your consent to process this information for identifying and allocating a musical instrument and informing you of the outcome, once you have submitted an instrument hire request form and to also use the information to prepare the hire agreement (contract). Once you sign the agreement, we can also process the information provided for maintaining and delivering the contract. We are

required though, through this privacy notice, to ensure you are fully informed of why we are collecting this information and what we will do with it.

Please note that no automated decision making (decisions taken without a person involved) occurs for any parts of these activities controlled by the County Council.

The County Council does not use profiling as part of this process through restricting its access to young people up to the age of 19, who are taught by Hampshire Music Service contracted staff through small group instrumental lessons, special centre sessions or ensemble membership.

### **Storing and Securing Data**

The information provided to us will be held within the County Council's instrument hire database. The information held within the access database will be kept for 6 years, plus the current fiscal year, and then disposed of as appropriate. The database is hosted by the County Council in secure data centres based in the UK. No information leaves the European Economic Area (EEA).

The County Council takes its data security responsibilities seriously and has policies and procedures in place to ensure the personal data held is:

- prevented from being accidentally or deliberately compromised;
- accessed, altered, disclosed or deleted only by those authorised to do so;
- accurate and complete in relation to why we are processing it;
- continually accessible and usable with daily backups; and
- protected by levels of security 'appropriate' to the risks presented by our processing.

The County Council also ensures its IT Department is certified to the internationally recognised standard for information security management, ISO27001.

### **Who do we share information with?**

We do not share information with anyone unless there is a lawful basis that allows us to do so. The information you provide for the instrument hire scheme is not shared with any third parties.

### **Requesting access to your personal data and your rights**

Under data protection legislation, individuals have the right to request access to information about them that we hold. To make a request for your personal information, or someone you have responsibility for, please contact the Children's Services Department's Subject Access Request (SAR) Team, whose contact details alongside further information around this process can be found via:

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/accessrecords>

You also have the right to:

- prevent processing for the purpose of direct marketing;
- object to decisions being taken by solely automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern about the way we are collecting or using your personal data, you can raise your concern with us in the first instance or you can go directly to the Information Commissioner's Office, as the supervisory authority, at <https://ico.org.uk/concerns/>.

### **Contact Details**

If you would like more information about these services please visit our website via: <https://www.hants.gov.uk/educationandlearning/hampshiremusic>

However, if you have a query around anything to do with data protection or wish to raise a concern about the way we are processing your information, you should please email the Children's Services Data Protection Lead at [childrens.services.dp@hants.gov.uk](mailto:childrens.services.dp@hants.gov.uk) with your concern or put it in writing to us at the following address:

Children's Services Department Data Protection Team  
Elizabeth II Court (North)  
The Castle  
Winchester  
Hampshire  
SO23 8UQ