

Ri Masterclass Organiser Handbook 3

Data protection requirements and guidelines

The Royal Institution (Ri) requires that all Masterclass groups abide by the Ri's Data Protection Policy, and more broadly with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018), together referred to as the 'data protection legislation', in collecting and processing personal data related to Ri Masterclass series.

The Ri acts as the data controller and sets the purpose for which personal data can be collected to deliver its Masterclass programme. Masterclass organisers act as data processors. This handbook outlines the scope and limitations of what data processing can be undertaken in order to run a Masterclass series. If you need to work with Masterclass data in any way that extends beyond the scope of this document, please talk to your Masterclass subject coordinator about setting up a Joint Data Controller Agreement **before** collecting or processing any data. This includes recording and storing video of online Masterclasses - if your organisation requires you to do this please contact your Masterclass network coordinator.

1. Definitions

Data controller: a natural or legal person (organisation) that collects and processes personal data. The controller is responsible for, and must be able to demonstrate, compliance with the principles.

Data processor: a natural or legal person who processes¹ data on behalf of the data controller. Shares accountability for data protection compliance with the data controller. Liable for any data breaches and therefore shares the financial burden of fines with the data controller. Note: everyone listed on the organiser agreement is a processor, including the supervisors.

Personal data: means any information relating to a natural person who can be directly or indirectly identified in particular by reference to an identifier.

Sensitive data: special categories of personal data. These include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, *genetic data*, *biometric data*, *health or sex life*, *sexual orientation*.

¹ Data processing includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

2. Ri data protection guidelines for Masterclass organisers

This section offers general guidance on complying with the data protection legislation, with specific reference to the Ri Masterclasses programme. Reading these guidelines does not constitute sufficient training to handle personal information. You should familiarise yourself with the Ri Data Protection Policy, the prevailing data protection legislation and the data protection procedures within your own organisation before collecting any personal or special categories of personal data. If you have any further questions about Masterclasses and data protection after doing so, please contact your Masterclass subject coordinator at the Ri before collecting any further personal data. Your subject coordinator or an Ri Data Protection Officer will be able to offer support and guidance in meeting data protection requirements.

Running Masterclasses involves the collection and processing of data that includes personal data about adults and children participating in the series. The Ri and Masterclass organisers are legally obliged to ensure that this information is stored, processed and disposed of in a safe and secure manner, in line with the Ri Data Protection Policy and the data protection legislation.

The key principles that must be adhered to are:

- Only collect data that is strictly necessary for the running of the Masterclass series
- Obtain informed consent for this data to be held and processed by you and shared with the Ri
- Use this data only for the purpose of running your Ri Masterclass series
- Ensure that all staff and volunteers who have access to data are familiar with data protection principles and have seen this handbook
- Ensure all data is stored securely and access is limited to those who are involved in the delivery of the Masterclass series
- Only hold personal data for as long as is necessary for the purpose that it was originally collected
- Destroy all student and parental personal data once the Masterclass series has ended and data has been passed on to the Ri
- Note that you can retain personal data for stakeholders such as speakers, supervisors, helpers and teacher nominators in order to contact them again since this is a core requirement for running Masterclasses, based on your legitimate interest. Communications with these stakeholders based on legitimate interest should be limited to necessary communications for Masterclasses and not include e.g. promotions for other events.

The order of processing the student data for a Masterclass series is:

1. Collect personal data and parental consent using the Ri consent form
2. Store data securely (electronic and paper records) to prevent unauthorised access and unlawful use
3. Share data with Masterclass supervisor so they have access to emergency contact details and other important personal/sensitive information, ensuring they store it securely
4. At end of series, complete the Ri End of Series Report (Excel spreadsheet to be provided by the Ri) and add the personal data to this
5. Share the data with the Ri by emailing the spreadsheet to us:
 - a. The spreadsheet containing the data must be password protected. Send the password in a separate email to us
 - b. Once received, the Ri will hold student data securely and use it to invite them to the end of year celebration, and for archival purposes (in line with our status as a heritage organisation)
6. **Destroy the data in your possession** (electronic and paper records). Ensure this is done no later than the end of the academic year in which the series is run

Securely retain data for all Masterclass stakeholders in line with GDPR regulations (such as teacher nominator and speaker contact details). You can contact them without requiring opt-in consent because this counts as legitimate interest.

3. Collecting data

The data you collect on behalf of the Ri in order to run a Masterclass series may include:

'Personal data':

- The name, address, date of birth, school and gender information of students
- The name, address, phone number and email address of persons holding parental responsibilities
- The name, email address, phone number, organisation (e.g. place of work) of Masterclass supervisors
- The name, email address, organisation and phone number of speakers and helpers
- The name, email address, school and phone number of teachers nominating the pupils

'Sensitive Data':

- Health information of pupils

You should collect no more personal data than is necessary to run the Masterclass series in a safe and effective manner. Student health information is the only sensitive information that you should need to collect in order to run a Masterclass. If you are currently, or are planning

to collect any further information classified as sensitive by data protection legislation please contact your Masterclass subject coordinator before taking any further steps to do so. **This includes video recordings of online Masterclasses collected for safeguarding purposes.**

At the point of collecting this data you should also be obtaining parental consent for Masterclass participation for anyone under the age of 18 (including helpers). If media waivers (photo, video etc.) are collected, they must also be signed by the person holding parental responsibilities for these participants.

4. Storing data

Data must be stored securely and access to personal data must be controlled and limited to only those who need to use the data for the purpose for which it was originally collected.

- Physical files (personal data on paper, for example) must be stored in a lockable storage container and must be destroyed once no longer needed
 - Where physical files must be used in Masterclass sessions (e.g. printed emergency contact information) they must be held by the Masterclass supervisor and only made accessible to those who may need to use them – e.g. helpers and speakers may need to know how to access the information in case of an emergency
 - Any documents which will be visible to workshop participants should only contain limited personal information which is essential for delivering a Masterclass session – consider what information is necessary for each of the roles involved in staging Masterclasses
- Digital files containing excessive amounts of personal data (such as lists of students) must be password protected, or access to those files should otherwise be controlled. Sharing of these files between committee members should use secure platforms, where access should be limited to only those who absolutely need access. Guidance is available on the Information Commissioner's Office website, <https://ico.org.uk/>

5. Appropriate data retention

Personal data should only be held for as long as necessary to serve the purpose for which it was originally collected. This means that student details should not be kept beyond the academic year that students are participating in the Masterclasses programme. After this point, all personal data related to participating students must be submitted to the Royal Institution, your Masterclass coordinator will request this along with your annual report. Once submitted to the Ri you must destroy all personal data relating to students.

In addition, the Ri Marketing Guidelines require that a log of photography consent statements be held with the student data.

6. Sharing of data with the Ri and other parties

Masterclass organisers must seek consent to share data with the Ri.

The Ri requires that the following subset of personal data be transferred to them. This should be done by adding the data to the Ri End of Year Report.

- Parent/carer name (first and surnames separated)
- Student name (first and surnames separated)
- Contact email for parent
- School name and postcode
- Any consent confirmations, e.g.
 - Confirm (yes or no) if consent given to general Masterclass statement
 - Confirm (yes or no) whether photographic consent was given
 - Confirm (yes or no) whether consent for data to be kept for Higher Education Access Tracker (HEAT) database (if used)

All data sharing must be secure – electronic data can be shared via email in password-protected files, physical records should be posted directly to the Ri, care of a Masterclass team member or delivered directly to an Ri Masterclass team member.

Personal data must never be shared with any other party unless there is a specific need and consent has been obtained from the data subject or, if under 18, the person holding parental responsibilities for them. Sensitive data must not be shared with third parties.

In any case please contact the Ri if you intend to modify the consent statements to include a third party for any reason.

7. Disposal of data

Once the purpose of the data has been served, it must be disposed of in a secure manner. Physical files should be shredded or placed in a confidential waste bin, while digital files should be completely removed from the system used to store them.

If you receive enquiries from students or parent/carer after disposing of the data (e.g. asking for a reference or asking for a replacement certificate), you will have to forward the request to the Ri for processing.

If in the unlikely event that you get enquiries regarding photographic consent after disposal of the data (for example, someone may want you to remove their images from your website), you must remove the images immediately and contact the Ri to arrange for their photographic consent status to be checked and updated to reflect the request.

8. Further information

The ICO guide to the General Data Protection Regulation can be found at the following location:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

The ICO introduction to the Data Protection Act 2018 can be found here:

<https://ico.org.uk/media/for-organisations/documents/2258303/ico-introduction-to-the-data-protection-bill.pdf>