



Data Protection Impact Assessment

1. Identify the need for a DPIA

1.1 This Data Protection Impact Assessment (DPIA) aims to identify risks arising out of Sharpe Academy's processing of personal data outlines processes to minimise these risks as far and as early as possible.

2. Describe the processing

2.1 Nature of the processing

2.1.1 How will you collect, use, store and delete data?

Collect:

Data is collected in a variety of ways depending on the class/training being provided:

- **Part-time students** — Via a secure web form on the Sharpe website, linked directly to the Membermeister student management system in order to facilitate administration and communication during enrolment.
- **Full-time Diploma students** — Via a secure web form on the Sharpe website. Contact data is used for email communication to arrange auditions, and for subsequent acceptance/recall offers or notifications in the event of an unsuccessful application.
- **Agent Sharpe clients** — Information provided by clients via email and agency contract.

Use:

Contact data for students who accept a place and enrol on the course is added to the Membermeister student management system in order to facilitate day to day administration and communication during enrolment.

Special Category data, in the form of medical and mental health information, is also stored securely. This data is freely provided and is used to:

- a) determine if an applicant is physically and mentally able to undertake three years of intensive physical training;
- b) ensure full support can be provided to the student for the duration of their training.

Store:

Data is stored on one of the following ways:

- In the Membermeister secure student management system.
- On Shopify's secure servers.
- In essential spreadsheets, required for course & class administration, stored either on secure iCloud Drive or Dropbox servers.

Delete:

Student and Parent records will be held for up to 6 years from the time the student has ceased their studies, in line with the Records Management Guidance and Retention Schedule for non-core students records.

2.1.2 What is the source of the data?

Data is provided by:

- Parents of prospective part-time students;
- Prospective full-time students or parents of prospective full-time students;
- Customers of Sharpe Dancewear.
- Clients of Agent Sharpe.

2.1.3 Will you be sharing data with anyone?

Data is used for internal administrative purposes only. We do not share any information with third parties unless we are required to do so by law or for any of the following reasons:

- A student takes an examination (Data is shared with the relevant examination board).
- A student has joined Agent Sharpe (Data is shared with the Spotlight Casting Directory & Casting Directors for Spotlight Membership, and other Casting providers).
- A student aged under 16 takes part in a Sharpe Academy production which requires a Body of Persons licence (Data is shared with the local authority for the area in which the production takes place, for example Harrow County Council).

2.1.4 What types of processing identified as likely high risk are involved?

None.

2.2 Scope of the processing

2.2.1 What is the nature of the data, and does it include special category or criminal offence data?

Data collected will include individuals' names, their date of birth and their address during enrolment. Special category data is limited to medical or mental health information volunteered by the student. Such data would be securely stored and used only to assist the student with their training.

2.2.2 How much data will you be collecting and using?

Data collected is limited to essential contact information, and any information necessary to administer the course. For example, a student's name and date of birth is required for the student to take any vocational exams – this data is submitted to the relevant examination board.

2.2.3 How often?

Students will be asked to complete an update questionnaire at the start of each academic year. This will give them the opportunity to update the personal data we hold.

2.2.4 How long will you keep it?

All information relating to enrolled students will be held for up to 6 years from the time the student has left in line with the Records Management Guidance and Retention Schedule for non-core students records.

2.2.5 How many individuals are affected?

Essential data will be kept for all enrolled students for the duration of their training and held for up to 6 years after the student has concluded their studies.

2.2.6 What geographical area does it cover?

Data will be held in data centres owned and managed by Membermeister (student management system), Apple (iCloud Drive storage), Microsoft (OneDrive storage), Shopify (e-commerce system), Dropbox, Back Blaze (backup systems).

Data subjects are from the UK, EU, and non-EU countries. Enrolled students are currently from the UK and Ireland.

2.3 Context of the processing

2.3.1 What is the nature of your relationship with the individuals?

Sharpe Academy has a contractual relationship with its students in order to provide training for the duration of their course.

2.3.2 How much control will they have?

Students will have the right to not complete the annual data update questionnaire, however the student will be made aware that inaccurate or out of date records may negatively impact the Academy's ability to provide fully effective and supportive training.

2.3.3 Would they expect you to use their data in this way?

Usage of the data is in accordance with the Sharpe Academy Data Protection and Privacy Policy.

2.3.4 Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws?

Sharpe holds the name and date of birth of children aged under 18 who are enrolled in part-time classes. This data is provided by parents/guardians of these children. No prior concerns have been reported regarding this data processing. All data is stored securely.

2.3.5 Is it novel in any way?

Collecting essential data in order for Sharpe to provide its classes and training is not a new practice. The technologies used to collect and store data are not novel, and are trusted secure platforms.

2.3.6 What is the current state of technology in this area?

The platforms used by Sharpe to collect and manage data use the latest technology and security. They are constantly evolving to improve functionality and security.

2.3.7 Are there any current issues of public concern that you should factor in?

There are no current significant areas of concern. Data practices are continuously monitored and enhanced as necessary.

2.3.8 Are you signed up to any approved code of conduct or certification scheme?

No. Sharpe Academy has its own Student and Staff Codes of Conduct which, along with all Sharpe policies, are reviewed annually.

2.4 Purposes of the processing

2.4.1 What do you want to achieve?

The aim of effective data processing is to ensure efficient administration of services provided by Sharpe Academy, both directly to its students and via the platforms it uses to fulfil these services. This will allow us to provide the best training and experience possible for students during the course of their training.

2.4.2 What is the intended effect on individuals?

It is our intention that students will feel fully supported throughout their enrolment and that this in turn will encourage them to fully embrace their training and realise their full potential. Maximising efficiency in our operations and administrative processes will enable us to provide the best service possible.

2.4.3 What are the benefits of the processing for you, and more broadly?

Then benefits of efficient and secure processing are many. These include giving the customer (students, parents, etc) peace of mind that their data is safe. Efficient processing greatly increases the productivity of the administration of the Academy, which in turn provides a higher standard of service and training to our students.

The training this allows us to provide benefits the Academy in the long term by creating highly skilled performers who, in turn, become ambassadors and role models for the Academy, encouraging potential future students to come to us for their own training.

3. Consultation process

3.1 Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so.

- When budgets allow, we intend to enlist the services of a third party DPO to assist us with developing these further, moving towards complete compliance. Due to being a small organisation and processing a relatively low volume of data, this expense has been determined to be a lower priority at this time. As our organisation grows, such consultations will increase, ultimately resulting in the appointment of an in-house team of experts. The nature of ever-changing technologies, regulations and procedures will mean that the consultation process will never be complete. Rather, it is a process that will constantly evolve. (see Step 4).
- Students and Faculty members form part of the consultation process. Students have regular wellbeing meetings which give them the opportunity to express any concerns or suggestions they may have. Staff meetings give Faculty members the opportunity to give ideas and opinions on all areas of the Sharpe community, training and environment.

3.2 Who else do you need to involve within your organisation?

We are a relatively small organisation, therefore no other involvement is currently necessary.

3.3 Do you need to ask your processors to assist?

Our relationship with Membermeister is long-standing and enables us not only to seek their assistance should any technical issues arise, but also to recommend changes and new features to them. Other data processors have established support helplines to ensure that effective and speedy support can be obtained in all matters.

3.4 Do you plan to consult information security experts, or any other experts?

Yes. As stated above, we intend to enlist the services of a third party DPO when budgets allow.

4. Assess necessity and proportionality

The necessity for robust and secure data practices is essential for organisations of any size. Sharpe Academy are committed to ensuring not only compliance with regulations, but maintaining secure practices to safeguard the data entrusted to us. We believe that the systems we currently use fulfil this security requirement. We acknowledge that increased awareness of ever-changing regulations will require engaging the services of experts in this field. However, this must be balanced against our means. As a small organisation, our resources are limited. These resources are, however, growing year on year and our investment in third party services will increase proportionately.

5. Identify and assess risks

See accompanying Data & IT Risk Assessment – SharpeAcademy.co.uk/

6. Identify measures to reduce risk

See accompanying Data & IT Risk Assessment – SharpeAcademy.co.uk/

7. Sign off and record outcomes

Item	Name / Position / Date	Notes
Measures approved by:	Nick Jackson Managing Director 27th August 2023	
Residual risks approved by:	Daniel Sharpe Principal 27th August 2023	
DPO advice provided:	See note below.	
Summary of DPO advice: This section to be completed upon appointment of, and review by, and external DPO officer. See section 3.1.		
DPO advice accepted or overruled by:	See above.	If overruled, you must explain your reasons: See above.
Comments:		

Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons:
Comments:		
This DPIA will kept under review by:	Nick Jackson, with annual consultations with an external DPO, once appointed.	The DPO should also review ongoing compliance with DPIA.