

ROYAL ACADEMY OF DANCE

Privacy Policy

1 Introduction

- 1.1 The Royal Academy of Dance, including the Awarding Organisation, is committed to protecting and respecting your privacy, and to processing personal information fairly and lawfully.
- 1.2 This policy explains, in respect of RAD exams:
 - how we collect personal information
 - what type of information we collect
 - why we collect it
 - the legal basis for processing the information
 - how we use the information
 - how long we keep it
 - when and how we may share it with others
 - how we keep it secure
 - your privacy rights and how the law protects you
- 1.3 In respect of its functions as an awarding organisation delivering assessments and awarding qualifications, the Royal Academy of Dance is a data controller. This means that we determine the purposes and means of processing the personal data we need to collect in order to carry out these functions.
- 1.4 The information in our database is set up so that a teacher (or School administrator) acts as a data collector (e.g. obtains the candidate information with the agreement of the candidate or relevant parents/guardians/carers), and then this information is held in our database. The School who collected the data is also a data controller.

The RAD and the School listed in the database are **joint controllers** of this candidate data.

The data controller would be the School and not individual teachers within that School. If a teacher leaves a School, they may register students under a new School. As a data controller, the School should comply with the UK GDPR requirements. As Joint Controllers with the School, the RAD will only deal with the School when updating student records. Former teachers at a School are not classed as data controllers.

- 1.5 Where teacher's or other relevant individuals (e.g. School administrators/applicants), collect student data for the purpose of entering a student for an RAD exam, they should make the candidate, and their parents/guardians/carers aware that their data is being held in the RAD database, and refer them to this privacy policy for more detail on the retention and use of this data.
- 1.6 We only use personal information if we have a valid reason to do so. This includes sharing information outside the Royal Academy of Dance.

2 How do we collect information about you?

- 2.1 We may obtain information about you when you:
 - complete an exam entry, registration or other relevant form (e.g. reasonable adjustment, special consideration, complaint or appeal), or someone else, such as a parent, School administrator or teacher, completes it on your behalf
 - speak to us on the telephone or in person (or someone else, such as your teacher, speaks to us)
 - email us (or someone else, such as your teacher, emails us)
 - make a payment
 - complete a survey
 - participate in an event or exam that is photographed or recorded on video
 - shared your details at a networking event

3 What type of information is collected?

- 3.1 The personal information we collect may include

for teachers, School administrators, and applicants:

- your title, name, address (including correspondence address, email, telephone number and where relevant, additional information for secure delivery of exam certificates and medals), phone number (including mobile or emergency contact number), and email address; the name, address, phone number, email address, and website address of your School or the exam location

for exam candidates (students):

- your name, date of birth, gender, ULN (Unique Learner Number), emergency contact details and previous exam results, footage of the candidate performing their examination (for filmed exams)
- **optional** ethnicity data, which the RAD requests and uses to inform and develop its EDI policy and procedures.

- detail about personal circumstances which would form the basis for an application for a bursary.
 - *in respect of reasonable adjustment and special consideration applications only* - relevant medical or SEND information.
- 3.2 Some of this information may have been collected previously by the RAD, for example when you were first registered for an exam or became a member. In such cases, we are collecting it for verification purposes only. Where the details previously held on you do not match your current communication, we may update our database with the new information provided.

4 How is this information used?

- 4.1 We may use this information to:
- register a school or exam location for the purpose of accepting exam entries and delivering exams
 - register students for exams, assign them an RAD ID number, and maintain a database of such students together with their examination record
 - receive and process exam entries, and schedule students for exams
 - process exam fee payments
 - contact you about your exam entry
 - deliver exams, process results, and award qualifications to successful students
 - deliver certificates, result forms and medals securely to teachers for distribution to their students
 - mark, standardise and moderate exams
 - make reasonable adjustments to exams procedures to remove barriers for students where this is possible
 - make special considerations to student exam results (where applicable)
 - seek your views or comments on the services we provide
 - notify you of changes to our services
 - send you communications which you have requested
 - handle an enquiry, complaint or appeal you have made
 - contact you in an emergency situation
 - assist in the quality assurance of an exam or training and standardisation of examiners
 - inform the decision-making process for the Exams Bursary
 - inform and develop our Equality and Diversity policies and procedures
 - review and improve our services.

5 What is the lawful basis for processing the information?

- 5.1 The lawful basis for processing the information is set out in any relevant privacy notice at the point where we collect the data. The bases we use are Contract, Consent and Legitimate Interest.
- 5.2 Where the lawful basis for processing this data is consent, this is for the Applicant to share the data gathered from students to enter an exam with the RAD and for RAD to administer that exam process. This consent has been gathered by the Applicant and confirmed on the exam entry with RAD.
- 5.3 Where the lawful basis for processing information is stated as consent, you have the right to withdraw your consent at any time, although such withdrawal may mean that the RAD cannot process your exam.
- 5.4 If you are providing medical or health related information, **we must have the explicit consent of the student or their parent / guardian if under 18** to receive and hold such information. The Applicant must email this to Exams Customer Services. In the absence of such consent, we will not be able to receive the information and may not be able to process the application.
- 5.5 Where the lawful basis for processing this data is Legitimate Interest, this is using filmed exam footage for internal quality assurance and standardisation of examiners, including trainee examiners. Footage is only viewed by RAD examiners, trainee examiners and relevant administrative staff, and is held by the RAD. We consider that this processing is necessary for the essential business function and quality assurance of the RAD and the exams service it provides to its candidates and teachers. We consider that this is fully in line with reasonable expectations, is not objectionable or intrusive, and does not open them to any undue vulnerability or negative impact.
- 5.6 Where the lawful basis for processing data is Legitimate Interest, you have the right to object at any time. Email exams@rad.org.uk for more information.
- 5.7 The processing of the exam entry by RAD and the holding of results by RAD is done on the basis of contract.

6 How long is the information kept?

- 6.1 We review how long we keep information on a regular basis and update our retention schedule accordingly. We are legally required to hold some types of information to fulfil our statutory obligations. We hold personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant privacy notice at the point where we collect the data. In addition, student data regarding qualifications and results is held in our database indefinitely, as an accurate educational record, to be able to fulfil RAD's obligations to you and for historical archive purposes. Footage of exams is held for as long as this data is relevant or applicable for quality assurance and standardisation purposes, and at the point at which it becomes irrelevant to the quality assurance of the services provided, will be deleted unless used under the Legitimate Interest purpose. Unless held for Legitimate Interest exam footage is held for no longer than 12 months after the exam.

7 Who has access to your information?

- 7.1 We DO NOT sell or rent your information to other organisations or buy or rent information from other organisations.
- 7.2 We may pass your information to third party service providers, agents, subcontractors or other associated organisations. This is only done when stated in any relevant privacy notice and for the purposes of completing tasks and providing services to you on our behalf which are consistent with the original purpose of collating and processing the data. An example of this is to a mailing house or delivery company to send you exam results and certificates. Details of who we share your data with can be seen below.
- 7.3 When we do this, we disclose only the personal information that is necessary to deliver the service, and we have an agreement in place that requires the third party to keep your information secure and not to use it for any other purpose.
- 7.4 We use an RAD Examiner Marking App to capture exam marks for students. This is a purpose-built app, held on an RAD iPad. Student data is added to the app from the RAD online exams database. Once added to the app, the relevant examiner will be able to see this data to award the candidate marks during their exam. The data cannot be seen by non-relevant staff. Once the marking is complete, the data is transferred back to the database. The data is deleted from the examiner's view in accordance with the RAD retention schedules (6

months, to allow for queries about results, complaints or appeals). The Marking App has undergone a DPIA to ensure security.

- 7.5 We use a third party provider, Microsoft Forms to run surveys and collect feedback from our customers (such as the teacher feedback survey at <https://forms.office.com/e/mcJmWhRaUP>). If you choose to provide your name and contact details when completing such a survey we will only use these to contact you about the survey, and will only keep your personal information for a stated duration (communicated at the time of completing the survey). If you choose to remain anonymous we will not contact you but will use your responses to inform our analysis of the feedback we receive.
- 7.6 We may use a third-party scheduling provider, [Doodle](#) (or 'doodle poll'), to offer a pre-booking request service for exam dates. Where used, we will only use the personal information you provide for the stated purpose and will only keep it for the stated duration (communicated at the time of completing the poll) which is likely to be the timeframe within which the scheduling will be completed.
- 7.7 The RAD is recognised to award qualifications on the Regulated Qualifications Framework (RQF) in England by the Office of Qualifications and Examinations Regulation (Ofqual), in Wales by Qualifications Wales (QW), and in Northern Ireland by CCEA Regulation, part of the Council for the Curriculum, Examinations and Assessment (CCEA). The RAD is also recognised to award qualifications on the Scottish Credit and Qualifications Framework (SCQF), by Qualifications Scotland Accreditation, a part of the Qualifications Scotland.

We may be required to submit data which includes personal information to one or more of these organisations or to other awarding organisations in accordance with a regulatory directive, in order to comply with their conditions of recognition, maintain the RAD's status as a recognised awarding organisation, or for quality assurance purposes. However, this is rare, and in most cases data is submitted in an anonymised form.
- 7.8 We use a third-party delivery company, Stephen Austin, to distribute certificates, results forms, medals and corresponding letters. Personal information will only be processed and stored for the stated purpose, and deleted once this purpose has been fulfilled. Applicants who enter students for exams should note that their personal details (including correspondence address, email, telephone number and local tax ID (where applicable)) as provided to us may be included on

packaging / address labels on the exterior of packages in order to enable swift and secure delivery of the contents.

7.9

Third party processor	Purpose(s)	Legal basis of processing
Dropbox	Examination footage sharing (Aus and NZ)	Consent Contract
Microsoft	Email communications/ Teams meetings	Consent Contract Legitimate Interest
Parnassus	Management Information System/ Exams Scheduling	Consent Contract
Synology	Large file sharing	Consent Contract
Zoom	Video/ Webinar Conferencing tool	Consent
Cvent	Event management/ Networking	Consent
Eventbrite	Event management/ Networking	Consent

- 7.10 For further information on filmed exams and the way that this data is captured, retained and deleted, please see [Filmed Examination Guidelines](#) for Teachers and associated documents - these can be found in the Members' area, or for non-members, by emailing and requesting copies - exams@rad.org.uk
- 7.11 Other than as set out above, we will not release information to other organisations unless in exceptional cases when we are required to do so by law, for example, by a court order or for the purposes of the prevention of fraud or other crime.

8 Social media

- 8.1 If you engage with the RAD on any of our social media channels we do not collect your personal information; it remains within the platform that we are using and so you should familiarise yourself with their privacy notices and policies: [Facebook](#), X formerly known as [Twitter](#), [Instagram](#), [LinkedIn](#), TikTok and [YouTube](#). If you send a message it may be directed to the Exams Department for response. Your information will remain within the platform unless we ask you

to provide us with your contact details to continue the conversation offline or privately, and you agree to this. Your data will be processed under a Legitimate Interest basis.

9 Children

- 9.1 We pay particular attention to protect the privacy of children when processing their personal data. The vast majority of our exam candidates are children (2 – 18 years old) and we need to collect their personal data in order to deliver exams and award qualifications to them. We take a privacy by design approach to ensure that we have the appropriate safeguards in place for the protection of the childrens' data. We implement appropriate technological and organisational measures with our systems and training with our staff to ensure the security of their data. Our processes are designed to be fair to children, to protect their rights and freedoms, and to be fully in line with their reasonable expectations and those of their parents/guardians.

10 Your choices and rights

- 10.1 You have a choice about whether or not you wish to receive information from us. If we ask for your permission to receive communications about the work of the Royal Academy of Dance and our products, services and events, you can select your choices by ticking the relevant boxes on the form on which we collect your information.
- 10.2 We will not contact you for marketing purposes by post, email, or text message unless you have given your explicit consent. You can change your preferences, withdraw your consent, object or ask for processing to be restricted at any time by emailing us at exams@rad.org.uk, phoning +44 (0)207 326 8000 or writing to Royal Academy of Dance, 188 York Road, London, SW11 3JZ.
- 10.3 Where students have attended an exam and a subsequent exam for the next level or related exam becomes available, we may get in contact with you giving you details of the next or related level that may be of relevance for your students. We contact you on the basis of Legitimate Interest using the soft-option. You can unsubscribe from such communications at any time by emailing us at exams@rad.org.uk, phoning +44 (0)207 326 8000 or writing to Royal Academy of Dance, 188 York Road, London, SW11 3JZ.

- 10.4 The accuracy of your information is important to us, and you have the right to ensure that the information we hold about you is accurate and up to date. If your details change and need to be updated, you may be able to update your own personal information online. If this is not possible, or you would prefer to make contact with us directly, you can update your personal details by emailing exams@rad.org.uk, phoning +44 (0)207 326 8073 or writing to Exams Department, Royal Academy of Dance, 188 York Road, London, SW11 3JZ.
- 10.5 You have the right to ask for a copy of the personal information we hold about you. Please contact DPO@rad.org.uk or write to Royal Academy of Dance, 188 York Road, London, SW11 3JZ. Following confirmation of your identity, we will have one calendar month to respond to your request.
- 10.6 You also have the right to have your information erased (if that information does not need to be held for legal reasons), to object, and to restrict processing. If you wish to do this please contact DPO@rad.org.uk or write to Royal Academy of Dance, 188 York Road, London, SW11 3JZ.

11 Security precautions in place to protect the loss, misuse or alteration of your information

- 11.1 When you provide us with personal information, we take the necessary steps to ensure that it's stored and treated securely. The RAD's website is built in HTTPS. The principal motivation for HTTPS is authentication of the website and protection of the privacy and integrity of the information exchanged while in transit; so you can be assured that any personal information that requires extra security (such as credit or debit card details) is encrypted and protected using industry standard security measures, including the Secure Socket Layer (SSL) protocol. While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, via email for example, and you do so at your own risk.
- 11.2 Once we receive your information, we make all reasonable efforts to ensure its security on our systems. We work with third party developers and system hosts who meet international security standards including anonymisation scripts.
- 11.3 Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are

responsible for keeping this password confidential. We ask you not to share your password with anyone.

12 Financial transactions

- 12.1 Where you use your credit or debit card to pay for a service, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard [here](#). We do not store your card details for use in future transactions and if you give us your card details over the phone we will not repeat these to you in response to confirm them. We use third party providers [Sage Pay](#) and [WorldPay](#) to securely process and store financial information, and we advise you to read their privacy policies.

13 Transferring your information across international borders

- 13.1 The RAD is a global organisation. As part of the services offered to you, the personal information which we store and process may be accessed by Royal Academy of Dance offices in countries around the world. By submitting personal data, you agree to this. We will take steps to ensure that appropriate safeguards are in place, in order to ensure that your privacy rights continue to be protected as outlined in this policy.
- 13.2 Where filmed footage of candidates is taken to allow our Panel of Examiners to mark the exam, applicants, students, parents/guardians/carers should be aware that this footage can be marked by any one of our Panel of Examiners worldwide, and therefore that the data (footage) can be sent from any one area/country to another for this process to take place. All footage is encrypted and password protected, and all members of the RAD Panel of Examiners are trained on the confidential nature of the data, and the way it should be processed, retained and deleted once the marking has been completed. We ensure that the appropriate safeguards of EU SCC's with the UK Addendum are in place. Email exams@rad.org.uk if you have any further questions or concerns on this issue.

14 Photography and video recording

- 14.1 Exams may be recorded on video for several reasons, including:
- as a submission for a Filmed Exam

- by RAD for quality assurance
 - an enquiry or complaint was made about an examination result, and we invited filmed footage of the candidate(s) to be supplied in order to help us resolve the complaint
 - video footage of 'mock examinations' was required for the purposes of examiner training, standardisation, quality assurance, and/or controlled comparability studies with other dance awarding organisations
- 14.2 Students or their parent/guardians should complete the relevant consent forms (generated automatically in RAD Online Exam Entry when the exam entry is made) and RAD teachers/Applicants should retain these for the period until the finalised results have been received, and results and certificates sent out, after which they should be deleted.
- 14.3 We use Planet eStream to upload any recorded footage. Planet eStream is a secure streaming platform. Teachers can request a login to upload footage, and the software will create a secure link for viewing by relevant staff. Only the teacher and staff with appropriate permissions will be able to see this footage.
- 14.4 Additionally, the exams department sometimes uses photography and video recording of individuals for the purposes of external marketing and communications. (Actual exams will not be used for this purpose). In these instances, it will be necessary for participants or their parent/guardian to complete a consent form, which is accompanied with a Privacy Notice and details of how the images and/or footage will be used and for how long they will be retained.

15 Questions and complaints

- 15.1 Any questions regarding this Privacy Policy, our Privacy Notices, or our privacy practices should be sent by email to exams@rad.org.uk or you can phone +44 (0)207 326 8073.
- 15.2 If you have a complaint about our privacy practices or the way we have collected, used, retained or disposed of data related to you please email DPO@rad.org.uk or telephone +44 (0)207 326 8000. Alternatively, you can contact the Information Commissioner's Office by calling their helpline on 0303 123 1113 (in the UK). You can also contact the equivalent national privacy authority in your country, if outside the UK.

16 Review of this policy

- 16.1 This policy is reviewed by the Exams & Regulatory Subcommittee and the Director of Exams is responsible for signing off the policy.

Policy Author:	Dan Phelps (Head of Exams Operations)
Approved by	 Mary Keene Director of Exams
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