



## Examinations privacy policy

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**Effective Date: 08/03/2021**

### **1 Introduction**

- 1.1 The Royal Academy of Dance, including the Examinations Board, 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 examinations:
- 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 examinations 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 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 examination that is photographed or recorded on video

### **3 What type of information is collected?**

- 3.1 The personal information we collect may include

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- *for teachers, school administrators, and applicants:* your title, name, address (including correspondence address for exam certificates), 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 examination location
- *for examination candidates:* your name, date of birth, gender, ULN (Unique Learner Number), emergency contact details and previous examination results, footage of the candidate performing their examination
- *for examination candidates:* **optional** ethnicity data, which the RAD requests and uses to inform and develop its Ethnicity and Diversity policy and procedures.
- *for examination candidates in respect of reasonable adjustment and special consideration applications only:* health or special educational needs and disability 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 this is not the case, we may update our database with the 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 examination entries and delivering examinations
- register candidates for examinations, assign them an RAD ID number, and maintain a database of such candidates together with their examination record
- receive and process examination entries, and schedule candidates for exams
- process examination fee payments
- contact you about your examination entry
- deliver examinations, process results, and award qualifications to successful candidates
- mark, standardise and moderate examinations
- make reasonable adjustments to exams procedures to remove barriers for candidates where this is possible
- make special considerations to candidate examination 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 examination or training of examiners
- inform the decision-making process for the Fiona Campbell Examinations 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, and consent.

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- 5.2 Where the lawful basis for processing this data is contract, this is the delivery and awarding of qualifications and assessments for candidates taking examinations in dance. We consider that the processing is necessary to achieve this purpose, benefits the individuals whose personal data we process, is fully in line with their reasonable expectations, is not objectionable or intrusive, and does not open them to any undue vulnerability or negative impact.
- 5.3 Where the lawful basis for processing information is stated as consent, you have the right to withdraw your consent at any time.
- 5.4 If you are providing medical or health related information, **we must have the consent of the candidate or their parent / guardian if under 18** to receive and hold such information. In the absence of such consent, we will not be able to receive the information and may not be able to process the application.

## 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 only 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.

## 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 to send you examination results and certificates.
- 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 a third party provider, [MailChimp](#), to deliver some e-communications (such as Focus on Exams). We gather statistics around email opening and clicks using industry standard technologies simply to help us monitor the use of and improve our e-communications. This information is not used to identify customers. For more information, please see [MailChimp's Privacy Policy](#). You can choose to unsubscribe from our e-communications at any time by clicking 'unsubscribe' in the footer of the email.
- 7.5 We use a third party provider, SurveyMonkey®, to run surveys and collect feedback from our customers (such as the teacher feedback survey at [www.surveymonkey.com/r/examsfeedback](http://www.surveymonkey.com/r/examsfeedback)). 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

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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 examination 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 doodle 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 SQA Accreditation, a part of the Scottish Qualifications Authority. The RAD is validated by the Council for Dance, Drama and Musical Theatre (CDMT) as an awarding organisation.

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 body, 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, Postal Logistics International, 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 candidates for examinations should note that their personal details 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 For further information on filmed examinations and the way that this data is captured, retained and deleted, please see *Applicant and RAD Office \_ Guidelines for filming RAD exams COVID-19* and associated documents/forms - these can be found in the Members' area, or for non-members, by emailing and requesting copies - [exams@rad.org.uk](mailto:exams@rad.org.uk)
- 7.9 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 prevention of fraud or other crime.

## 8 Social media

- 8.1 If you engage with the RAD on any of our social media channels you should know that 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](#), [Twitter](#), [Instagram](#), [LinkedIn](#) and [YouTube](#). If you send a message it may be directed to the Examinations 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 consent to do that.

## 9 Children

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9.1 We are particularly concerned to protect the privacy of children. The vast majority of our examination candidates are children (2 – 18 years old) and we need to collect their personal data in order to deliver examinations and award qualifications to them. We are confident that our systems and 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. We take responsibility for identifying the risks and consequences of processing children's data.

### 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](mailto:exams@rad.org.uk), phoning +44 (0)207 326 8000 or writing to Royal Academy of Dance, 36 Battersea Square, London, SW11 3RA.

10.3 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](mailto:exams@rad.org.uk), phoning +44 (0)207 326 8073 or writing to Examinations Department, Royal Academy of Dance, 36 Battersea Square, London, SW11 3RA.

10.4 You have the right to ask for a copy of the personal information we hold about you. Please contact [ipoguedp@rad.org.uk](mailto:ipoguedp@rad.org.uk) or write to Royal Academy of Dance, 36 Battersea Square, London, SW11 3RA. Following confirmation of your identity, we will have one calendar month to respond to your request.

10.5 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 [ipogue@rad.org.uk](mailto:ipogue@rad.org.uk) or write to Royal Academy of Dance, 36 Battersea Square, London, SW11 3RA.

### 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.

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- 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 [Global Payments](#) 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 security measures are taken at all times, 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 examination, applicants, candidates, 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. Email [exams@rad.org.uk](mailto:exams@rad.org.uk) if you have any further questions or concerns on this issue.

### 14 Photography and video recording

- 14.1 Examinations or 'mock examinations' may be recorded on video in the following instances (this list is indicative and not exhaustive):
- where examinations with an examiner visit are made impossible due to global events (e.g. pandemic, civil unrest etc.)
  - they are Solo Seal examinations
  - an examination or day of examinations could not take place at the scheduled time and it proved impossible or impractical to reschedule
  - an examiner was not available to conduct examinations
  - it was not possible to show a section of an examination on the day and it was agreed that this could be submitted on video at a later date

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- 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 On these occasions, it will be necessary for participants or their parent/guardian/carer to complete the relevant consent forms, which are accompanied with Privacy Notices and details of how the footage will be used and for how long it will be retained.

14.3 Additionally, the examinations department sometimes uses photography and video recording of individuals for the purposes of external marketing and communications. (Actual examinations 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](mailto: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 [ipoguedp@rad.org.uk](mailto:ipoguedp@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 annually by the Examinations Regulatory and Standards Committee, in the light of the RAD's corporate Data Protection policy, and is signed off by the Director of Examinations.

Policy Adopted Date: March 2021

Policy Review Date: March 2023

Circulation:

- RAD website
- National Directors, National and Regional Managers, and RAD Representatives



**James Stockdale**

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**Director of Examinations**