



# THE DANG THEATRE AND DANCE SYLLABUS (DTDS) DATA PROTECTION POLICY

## Introduction

The Dang Theatre and Dance Syllabus is fully committed to compliance with the requirements of the Data Protection Act 2018 and all other data protection legislation currently in force. The Regulation applies to anyone processing personal data and sets out principles which should be followed and gives rights to those whose data is being processed.

To this end, DTDS endorses fully and adheres to the Data Protection Principles listed below. When processing data we will ensure that it is:

- processed lawfully, fairly and in a transparent way ('lawfulness, fairness and transparency')
- processed no further than the legitimate purposes for which that data was collected ('purpose limitation')
- limited to what is necessary in relation to the purpose ('data minimisation')
- accurate and kept up to date ('accuracy')
- kept in a form which permits identification of the data subject for no longer than is necessary ('storage limitation')
- processed in a manner that ensures security of that personal data ('integrity and confidentiality')
- processed by a controller who can demonstrate compliance with the principles ('accountability')

These rights must be always observed when processing or using personal information. Therefore, through appropriate management and strict application of criteria and controls, DTDS will:

- observe fully the conditions regarding having a lawful basis to process personal information
- meet its legal obligations to specify the purposes for which information is used



- collect and process appropriate information only to the extent that it is necessary to fulfil operational needs or to comply with any legal requirements
- ensure the information held is accurate and up to date
- ensure that the information is held for no longer than is necessary
- ensure that the rights of people about whom information is held can be fully exercised under the Data Protection Act 2018 (i.e., the right to be informed that processing is being undertaken, to access personal information on request; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information)
- take appropriate technical and organisational security measures to safeguard personal information
- ensure that personal information is not transferred outside the EU, to other countries or international organisations without an adequate level of protection

## Issue and review

The date of issue of this policy is January 2023. This policy will be reviewed annually in January of each preceding year.

## Employees' Personal Information

Throughout employment and for as long as is necessary after the termination of employment, DTDS will need to process data about you. The kind of data that DTDS will process includes:

- any references obtained during recruitment
- details of terms of employment
- payroll details
- tax and national insurance information



- details of job duties
- details of health and sickness absence records
- details of holiday records
- information about performance
- details of any disciplinary and grievance investigations and proceedings
- training records
- contact names and addresses
- correspondence with the Academy and other information that you have given the Academy

The data DTDS holds will be for management and administrative use only but DTDS may, from time to time, need to disclose some data it holds about you to relevant third parties (e.g. where legally obliged to do so by HM Revenue & Customs, where requested to do so by yourself for the purpose of giving a reference or in relation to maintenance support and/or the hosting of data in relation to the provision of insurance).

In some cases, DTDS may hold sensitive data, which is defined by the legislation as special categories of personal data, about you. For example, this could be information about health, racial or ethnic origin, criminal convictions, trade union membership, or religious beliefs. This information may be processed not only to meet DTDS's legal responsibilities but, for example, for purposes of personnel management and administration, suitability for employment, and to comply with equal opportunity legislation. Since this information is considered sensitive, the processing of which may cause concern or distress, you will be asked to give express consent for this information to be processed, unless Urdang International has a specific legal requirement to process such data.



## Access To Data

You may, within a period of one month of a written request, inspect and/or have a copy, subject to the requirements of the legislation, of information in your own personnel file and/or other specified personal data and, if necessary, require corrections should such records be faulty. If you wish to do so you must make a written request to your line Manager. DTDS is entitled to change the above provisions at any time at its discretion.

## Data Security

You are responsible for ensuring that any personal data that you hold and/or process as part of your job role is stored securely.

You must ensure that personal information is not disclosed either orally or in writing, or via web pages, or by any other means, accidentally or otherwise, to any unauthorised third party.

You should note that unauthorised disclosure may result in action under the disciplinary procedure, which may include dismissal for gross misconduct. Personal information should be kept in a locked filing cabinet, drawer, or safe. Electronic data should be coded, encrypted, or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

When travelling with a device containing personal data, you must ensure both the device and data is password protected. The device should be kept secure and where possible it should be locked away out of sight i.e., in the boot of a car. You should avoid travelling with hard copies of personal data where there is secure electronic storage available. When it is essential to travel with hard copies of personal data this should be kept securely in a bag and where possible locked away out of sight i.e., in the boot of a car.



## Notifying Breaches

If we become aware of a breach, or a potential breach, involving personal data, an investigation will be carried out. This investigation will be carried out by the Data Protection Officer.

We will undertake to notify the Information Commissioner of a breach which is likely to pose a risk to people's rights and freedoms without undue delay and at the latest within 72 hours of discovery. If we are unable to report in full within this timescale, we will make an initial report to the Information Commissioner, and then provide a full report in more than one instalment if so required. We will undertake to notify the individual whose data is the subject of a breach if there is a high risk to people's rights and freedoms without undue delay.

## Data Retention

The Dang Theatre and Dance Syllabus retains certification and qualification details, under Legitimate Interests, even when a member has lapsed to allow for confirmation of qualification should it be needed and to allow for re-joining at a later date.

- **Assessment sessions**

We hold candidate details in order to issue certificates and awards for assessment sessions. These details are stored indefinitely so that we can confirm qualifications at a later date should it be necessary. Information that we hold for students for non-regulated assessments is limited to Name, Dance School and Assessment taken, this information is not shared unless required to do so by law.

## Regulated Grades Sessions

Personal details for Regulated Grades students are held for the purposes of the examination process. These details are stored indefinitely so that we can confirm qualifications at a later date should it be necessary. The information that we hold is candidates' name, address, date of birth and qualifications taken. These details are passed to an overseeing body for ratification and processing in accordance with OFQUAL guidelines.



## Controlling Your Personal Information

We may use your personal information to send you information, such as newsletters relating to Urdang International events and activities. If you have previously agreed to us using your personal information for these purposes, you may change your mind at any time by writing to us at The Dang Head Office or by emailing [syllabus@thedang.com](mailto:syllabus@thedang.com).

## Disclosure

We will not sell, share or pass on your personal details to any third parties, other than described in this Privacy Policy, unless we have your permission or are required to do so by law. This may include governmental agencies, regulatory bodies or other person in line with any applicable regulations, laws, court orders or official request. If you believe that any information that we hold is incorrect or incomplete, please email at [karen@thedang.com](mailto:karen@thedang.com) as soon as possible. Your request will be dealt with promptly.

## Security

We are committed to keeping your information secure. To prevent unauthorised access to your information we have put in place suitable safeguard procedures including physical and electronic.