

## **DATA PROTECTION POLICY**

The Royal Welsh College of Music and Drama (RWCMD) is committed to protecting the rights and freedoms of individuals with respect to the processing of their personal data. RWCMD will at all times handle personal information in accordance with:

- The Data Protection Act 1998 (the Act)
- The Privacy and Electronic Communications Regulations 2003 (the Regulations)
- The terms of RWCMD's notification as a data controller with the UK Information Commissioner (**Reference No: Z9702162**), which sets out the purposes for which the College holds and processes personal data about employees, students, graduates and others.
- This policy
- The College's Guidelines on Data Protection Compliance

### **COMPLIANCE**

1. Any person handling personal data on behalf of the College must comply with this policy
2. This policy applies to all personal data created, held and received by or on behalf of the College for RWCMD's purposes, regardless of where it is held and irrespective of the ownership of the equipment used.
3. The College has a legal duty to comply with the Act and the Regulations
4. Any breach of the College's policies, procedures or its Guidelines on Data Protection Compliance may result in disciplinary action.
5. The use and disclosure of personal data contrary to the requirements of this policy may constitute a criminal offence. RWCMD staff are therefore expected to familiarise themselves with all relevant policies, procedures and Guidelines in relation to data handling and seek advice if they are in any doubt about what is required of them.

### **PERSONAL DATA**

All information held by or on behalf of RWCMD that relates to living identifiable individuals is "personal data" for the purposes of the Act and this policy. A person may be identifiable even if their name is not used, for example where a student or staff number is used in connection with a particular piece of information or where a person's identity is obvious from the circumstances.

### **THE DATA PROTECTION PRINCIPLES**

The Data Protection Act sets out eight principles governing the use of personal information with which all College users must comply unless an exemption applies. These principles ensure that personal information is:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive

4. Accurate and up to date
5. Not kept for longer than is necessary
6. Processed in line with individuals' rights
7. Kept secure
8. Not transferred to other countries without adequate protection

The College is committed to complying with these principles at all times when handling personal data. The College ensures that these principles are complied with by requiring its staff to follow its Guidelines on Data Protection Compliance at all times

### **THE PRIVACY AND ELECTRONIC COMMUNICATIONS REGULATIONS 2003**

The Regulations impose obligations on RWCMD in relation to its use of electronic systems for marketing purposes. Any use of email, fax or telephone systems for direct marketing purposes must comply with the Regulations. RWCMD is committed to ensuring that appropriate consents are in place, as required by the Regulations, before any marketing communications are sent by or on its behalf by electronic means. RWCMD ensures that its obligations under the Regulations are complied with by requiring its staff to follow its Guidelines on Data Protection Compliance.

### **BREACH REPORTING**

Any data security breach must be reported to the Information Systems Manager as a matter of urgency so that appropriate action can be taken to minimise any adverse impact on affected individuals and so that appropriate action can be taken to ensure that corrective action is taken. It may be necessary to refer serious data security breaches to the Information Commissioner's Office

### **RESPONSIBILITIES**

The Information Systems Manager is the registered contact with the Information Commissioner's Office. The Information Systems Manager will be able to advise members of the College on all matters relating to the Act and the Regulations.