

PRIVACY STATEMENT

For users of the Report + Support platform

Purpose

The purpose of this document is to convey to you the RCM's commitment to protecting personal information and ensuring that it is held securely, and ensuring it is only used within the meaning of the 2018 Data Protection Act and the UK's General Data Protection Regulations.

It is intended that this document should be read in conjunction with the RCM's other Privacy Statements and its Data Retention policy available on the RCM's website.

This privacy statement describes the Royal College of Music's (RCM) use of personal data gathered through the Report + Support platform as well as providing information about your rights.

The lawful basis for obtaining and using your personal data

The RCM is the data controller and as such we are legally responsible for the way in which your data is held and processed.

We need your personal data in order to process your report submitted to Report + Support. The relevant sections of the 2018 DPA include:

- Article 6 (1) (b) to meet the RCM's obligations under its contract with the individual.
- Article 6 (1) (c) so we can comply with our legal obligations as an employer.
- Article 6 (1) (d) in order to protect your vital interests or those of another person.
- Article 9 (2) (g) – substantial public task – safeguarding of children and individuals at risk, under para.18, Part 2, Schedule 1 of the Data Protection Act 2018 as amended, is adopted.

How your data is used

The Report + Support platform is intended to allow people to tell authorised staff at the RCM about an incident that they feel needs further action or investigation, such as, for example, bullying or harassment. People are invited to use the platform for reporting incidents that have occurred to them, or incidents that they may have witnessed.

'People' means staff and students (both current and former) of the RCM, visitors, enquirers, supporters and applicants.

Data collected through the Report + Support platform may refer to the reporting individual and any other persons mentioned in the report.

The Report + Support tool is maintained by the RCM's Registry and Student Services Departments

'Personal data' means any information which identifies you as an individual. That will include such data items as your name, date of birth, gender identity. Some data items are considered sensitive, such as racial or ethnic identity, religious beliefs, physical or mental health characteristics or sexual orientation. These characteristics are afforded a high level of protection under the data protection laws. We will process your information by means of collecting it, storing it, disclosing it, deleting it or retaining it.

Incident reports using Report + Support may be made either anonymously or with personal details of the reporter (a 'named' report). An anonymous report will not include anything that allows individuals to be identified, and a 'named' report will include as many details that the person submitting the report wishes to include.

When an anonymous report is received by the RCM our follow-up actions are limited to using the information to help us better understand ways in which we might prevent incidents from arising. It is unlikely that an anonymous report will lead to a formal investigation.

Named reports will be acted upon by designated staff members in the RCM including the Academic Registrar, the Student Services Manager and, where relevant, the Head of Human Resources. You will be contacted by the Academic Registrar (or the Head of Human Resources if the reporting person is a member of staff) and will be offered impartial advice and the opportunity to discuss the best way to take forward your complaint. In some situations (for example, if you have told us who you are, or given the name of the reported person and there are serious concerns about safety) information may need to be shared with other relevant staff, but access to any information will be on a strictly needs to know basis only. If this is the case, we will let you know.

The data provided in each of the reports will be used as follows:

(a) anonymous reports: where no name or contact email address is provided this means the RCM will not be able to contact the reporting person to provide direct advice or support. We will therefore not be able to investigate the reported behaviour and therefore no disciplinary action will be taken in relation to the reported person. The report data will help the RCM to provide better support to others and inform our prevention work.

(b) named reports: where the names and contact email address of the individual making the report are provided these will be allocated to a designated staff member who will contact the reporting individual to discuss the situation and provide impartial guidance on how to resolve the situation informally or make a formal complaint to help the reporting individual decide what to do. Personal data is collected in named reports and a free text box is available for you to add further details of the incident in question.

Data may be shared with third parties only in the course of investigating serious disciplinary or legal proceedings. Such parties include impartial investigation professionals, the police, social care services, representatives of the legal profession or statutory bodies with a legal justification for acquiring data.

The RCM will use data from Report + Support to monitor its management of complaints and for reporting purposes. Data will be anonymised to remove the risk of an individual being made identifiable from a report. Data is NOT shared with Culture Shift (the owners of the Report + Support tool). Data submitted to Report + Support will be kept for a period of not more than 5 years after the date of submission.

We regularly review this privacy notice to ensure that it remains accurate, and all changes are published here.

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