

Data Retention Policy

The Co-operative of actors known as Actors Alliance receives and processes Personally Identifiable Information (PII) from the following sources:

1. a) Current Members
b) Former Members
2. Applicants (prospective members)
3. Professional contacts (casting directors, producers etc)

Below outlines the procedures for the management of PII from each of the sources.

1. a)

On successfully joining Actors Alliance the following personal information is held:

Name
Date of Birth
Postal address
Email address
Phone number
Bank details
National Insurance Number
Wardrobe measurements
Emergency contact details
Passport scan
Curriculum Vitae details

This is held to allow the cooperative to effectively represent the member as a theatrical agent.

Members have signed a declaration that allows this information to be stored, and shared outside of the organisation for business purposes. Examples of this include (but are not limited to):

- sharing passport details with producers to arrange flights
- copying in another member's personal email address to an email thread containing PII, allowing them to act as 'Lead Agent'

1. b)

Once members have left Actors Alliance the following information may be retained:

Name
Postal address
Email address
Phone number
Bank details
National Insurance Number
Curriculum Vitae details

The retention of this information is to allow Actors Alliance to continue to process monies that are paid for work undertaken by the member before they left, an example of such work would be a television repeat fee. Actors Alliance may also have to invoice for the recommissioning of work undertaken by the member before they left, for example a commercial buyout extension.

This information is retained permanently to facilitate these financial transactions unless the former member requests otherwise. Annually, Actors Alliance seeks contact with all former members to ensure data held is accurate and up to date. Due to the possible financial implications of deleting former member files three attempts to make contact are made, each with a 30 day deadline. After this a lack of contact would render the data 'dead' and the member file would be deleted, excepting their name as a record that they were in fact a member should money be paid to Actors Alliance for them.

2.

Applicant information is voluntarily submitted by individuals wishing to join Actors Alliance. Typically this may include:

Name
Date of Birth
Postal address
Email address
Phone number
Wardrobe measurements
Curriculum Vitae details

During the application process any PII Actors Alliance has received will be securely stored on our systems where only current members will have access to view the application for the purposes of determining suitability.

If an application is successful the data will change status to that of a Member and be processed accordingly.

If an application is rejected the data is deleted, excepting their name and application notes which are kept on a log in case they choose to reapply. The applicant is informed of this in writing at the close of their application.

Our aim is to process applications as swiftly as possible - the aim for an initial response is 14 days, after this timelines are more elastic to allow for candidate availability to meet us and to demonstrate their ability in a show. Sometimes an application is 'pending' whilst we wait for an opportunity to see the actor in a show. The maximum length an application can be held without progress is one year. The unusual length of time is due to the nature of the hiatus, waiting for the applicant to be cast in and rehearse a show which can take many months. At the start of the 'pend' the applicant is advised of this time frame. After twelve months the application is deleted in the same way as a rejection (retaining name and notes). The applicant is made aware of this and told they must reapply when they are in a show.

3.

Data from corporate contacts (for example casting directors or producers) is obtained through legitimate business contact or the public domain and used for the purposes of representing Actors Alliance's members as actors. Due to the nature of the industry, mostly consisting of self employed individuals, it is accepted that retention of this data is crucial to the work Actors Alliance does. That being said the following procedures are undertaken to ensure the information is kept and used appropriately.

- any PII is checked at least once a year to make sure it is up to date and any staffing changes result in a deletion of dead data.
- Data is only kept if regular contact is being made. If a contact is not on the 'calls list' (excepting in error) the data is deemed dead and any PII should be deleted. For avoidance of doubt, this means that if deemed as a dead contact there would be no need to delete the email address casting@rsc.com but it would be necessary to delete johnsmith@rsc.com.
- no personal addresses/contacts can be used for direct marketing. Suggesting clients via Spotlight or after permission has been attained via email is permissible. This is in line with submission policy but must be adhered to for compliance with GDPR.

Digital Storage Policy

- the aim is that no PII is stored on paper due to the difficulty of securing and tracking it. Actors Alliance however has a 42 year back catalogue of paper records. The digitisation or destruction of these is being undertaken as quickly as possible and this policy will be updated to reflect the completion of this task.
- digital PII (of all three categories outlined above) is stored either on Google Drive or iCloud. Both of these cloud based storage mechanisms are encrypted and require 2 Factor Authentication to gain access. Based on the limited resources of the agency this is the most we can currently afford to prevent hacking of our stored data.
- In a post covid remote working set up it is accepted that members will access Actors Alliance information including PII remotely using their own devices. Security is maintained via the above mentioned 2FA with a second member having to grant access.

Breach Policy

Once a potential breach is thought to have occurred the Information Governance Officer or (if they are absent) a nominated deputy has 48 hours to discover the details of the potential breach and attempt to mitigate it. After 48 hours if it is deemed that a breach did occur the Officer will inform the ICO and any affected owners of PII lost.

A review of procedures under advisement of the ICO will take place to hopefully prevent any further breaches.

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Subject Access Requests

Should a SAR be submitted to Actors Alliance the information Governance Officer or a nominated deputy has 3 working days to make an initial response outlining a receipt of the request and outlining an expected timeframe for response.

It is expected that SAR will be filled within 30 days of the initial response being sent. If more time is needed, the requester must be informed of this as soon as possible and before the 30 day deadline.