ROYAL CENTRAL SCHOOL OF SPEECH & DRAMA UNIVERSITY OF LONDON

Privacy Notice – Students

The Royal Central School of Speech and Drama is committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about applicants and students, how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

If you have any questions regarding this policy please <a href="mailto:emailto

You can also <u>contact Central's Data Protection Officer</u>, for example if you have any general questions about Central's privacy practices, by email, or by writing to them at The Royal Central School of Speech and Drama, 62-64 Eton Avenue, London NW3 3HY.

Who we are

The Royal Central School of Speech and Drama (or Central) is a small and specialist higher education institution that stands at the forefront of training and research in the theatre and performance arts. On our website you can <u>find out more about Central</u>, including its range of undergraduate and postgraduate programmes. <u>Company and exempt charity information</u> about Central can also be found there.

How we collect information from you

We obtain information about you when you apply to our programmes and then again when you become and continue to be a student: for example, when you make an application to UCAS or directly for a postgraduate programme, make a booking for an audition or interview, undertake a fee assessment, apply for Accredited Prior Learning, register for a programme of study and enroll on a course each year.

We also record some information about you or that you give us when you interact with Central during your time as a student, via communication channels like email, telephone and post. Information about you is also shared with Central from third parties, for example, your previous or current education providers or employers, as accreditors, referees or sponsors.

What personal data we hold

The personal data we collect might include:

- Basic biographic information like your name
- Education and employment information like your start and end dates
- Personal and family circumstantial information like your academic attainment
- Sensitive personal information like you ethnicity

If you purchase a ticket for an event like an audition or graduation, this is managed by our third party payment processors, who specialise in the secure online capture and processing of personal information and credit/debit card transactions, as explained below.

How we use your information and how long we keep it for

Central has to process some of the information it holds on you as an applicant and a student in order to undertake our contractual obligations to you as an applicant and a student. Sometimes we process your information to protect your interests or that of another natural person. It is also necessary to process your information to comply with our legal obligations (regulatory and compliance) or for the performance of a task carried out in the public interest or in the exercise of official authority vested in Central. In this case your information is often used as an aggregate of the whole student population.

We may process data that is classed as a "special category" of personal data, this includes information about your gender identity, religion or belief, sexual orientation, nationality, ethnicity and disability. We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, you are able to provide a response of 'Information refused' when asked about these categories.

Central does not use automated processes to make decisions about individuals.

The purposes for which we process your information include:

Recruitment and admissions processes.

- Academic processes like teaching, learning and research, registration, enrolment, assessment, attendance, external examining, progression and classification, graduation, academic misconduct, mitigating circumstances, break in studies, wellbeing and fitness to study and other educational services that are introduced.
- Non-academic processes like disability and dyslexia services, counselling services and student advice services, monitoring equal opportunities and diversity, safeguarding and promoting welfare, ensuring safety and security, managing accommodation and managing social media use.
- Information about DBS (Disclosure and Barring Service) checks.
- Maintaining student and alumni records.
- Assessing eligibility for bursaries, scholarships and financial awards and then managing them alongside tuition fees and sponsorships. This includes managing debt to Central and recovering money owed.
- Providing services like campus access, the library, information technology and technical support, alongside health and safety management.
- Quality assurance and enhancement processes such as surveys, annual programme monitoring and programme reviews.
- Research and statistical analysis to assist School management, performance, training and planning across academic, corporate, data, estate, financial and human resources.
- Dealing with disciplinary actions and complaints.
- Carrying out audits.
- Seeking advice on Central's rights and obligations plus assistance with investigations, legal and otherwise.
- Promoting our services, fundraising and events. The School may record images of students and/or their work for use in promotional material, advertisements, or on its website.
- Other needs where you have given specific or explicit consent to do so.

We review our retention periods for personal information on an annual basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as it is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. Read our Data Protection and Records Retention Handbook for more detailed information.

You may also like to read our <u>Alumni Privacy Policy</u> for information about how your data is handled as an alumni.

Who has access to your information

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Personal information about you will not normally be disclosed to a third party except in those cases where Central is required to provide information to the Higher Education Statistical Agency (HESA) or another Government Agency (such as the Student Loans Company, the US Federal Loans programme, UK Visas and Immigration, Electoral Registration Officers, and organisation(s) responsible for conducting the National Student Survey and the Graduate Outcomes Survey). Details of how HESA processes information is available on their website.

There are a few exceptions to this; for example medical information would be released if failure to do so would cause you harm or death. Information might be released to assist the police in making an arrest or to safeguard national security. We might also provide other higher education providers with basic information about you (for example, your dates of enrolment, and details about your progression and attainment) to assist with reference requests or with any disciplinary or academic misconduct investigations that they are undertaking. However, we will not release your data to a friend, parent or employer without your explicit consent to do so (other than to simply confirm that you are in attendance, in which case we would normally confirm this fact without seeking your permission first). This may occasionally be inconvenient, if you informally ask a friend to act for you, but the policy is intended to preserve confidentiality and abide by the law.

Personal data, particularly in relation to outcomes and sanctions, may be shared in certain circumstances relating to disciplinary proceedings and/or complaints, in accordance with data protection legislation and following a data sharing impact and risk assessment. Reports of harassment may be anonymized and kept for reporting and statistical purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to conduct surveys, send you mailings, maintain our student management system or complete ticket orders). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service. Please be reassured that we will not release your information to third parties unless you have requested us to do so, or 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, or we assess that it is in our legitimate interests to do so (for example, passing your details to a third-party debt collection agency in the event that we need to recover outstanding tuition fees). Central normally holds data sharing agreements with third party service providers who work on its behalf.

If you apply for or accept accommodation belonging to and/or managed by the University of London, we will share some of your details with its Accommodation Service.

Some of your personal details are shared with the Students' Union so that they can provide their services to the student body. The primary purpose for the information sharing is to administer membership of Central's Students' Union and to the National Union of Students

(NUS). Central Students' Union and NUS have their own privacy statements which detail how they use your information.

If you are registered on MA Drama and Movement Therapy, we will forward your details to the Health and Care Professions Council as part of your professional registration with that organisation.

If you are made an award by an examination board, you are entered onto a passlist which is shared with the University of London Diploma Production Office so that they can produce your certificate. This information includes your legal names, address for the certificate to be posted to, award title, classification, date of award and a flag if you have academic related debt with Central.

Your legal names and award (not the classification) will be included in the annual graduation ceremony programme which is an official academic record of the awards made by Central. Your legal names and award information is shared with third parties involved in producing memorabilia, graduation ticketing, academic dress hire, and event video. All graduation ceremonies are recorded for projection in the venue, live streaming and videos. Attendees give consent for their image to be recorded when they book their tickets to the event.

Third Party Product Providers we work in association with:

- Central has partnered with Convera for the processing of tuition fees and payments to students (for example, scholarships and bursaries).
- When you are purchasing a ticket, for example for a production or audition, your
 payment is processed by a third party payment processor (currently Eventbrite and Ede
 & Ravenscroft), which specialise in the secure online capture and processing of
 credit/debit card transactions.

If you have any questions regarding secure transactions, please contact us.

Your rights

Updating your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us.

Applicants	Admissions and Student Recruitment Office	admissions@cssd.ac.uk
Current students	Student Advice Service	sas@cssd.ac.uk
Past students	Academic Records Office	aro@cssd.ac.uk

Accessing your information

You have the right to ask for a copy of the information Central holds about you, known as a Subject Access Request. You can find out how to request this data.

Withdrawing consent and erasing your information

You have the right to withdraw the consent that you have provided to restrict the processing of your information. This would not affect the lawfulness of the processing performed before consent is withdrawn. Exceptions apply where consent it not required to process your information and in those instances Central would not erase your information. An example of such an instance is some of the information you provide when you register and enroll, plus the assessment information recorded during your study which form your student record. This is required for Central to conduct its business in perpetuity so would be retained. Central has also identified that its use of images of students and/or their work in promotional material for the School is in its legitimate interests, and that your consent is therefore not required.

Please note that where the processing of your personal information requires your consent, we may not be able to fully provide all of our student services to you if you withdraw that consent.

You can <u>ask us to erase the personal information</u> that we hold about you, where possible per the <u>Data Protection and Records Retention Handbook</u>. Please email us for more information.

How we keep your personal data safe

When you give us personal information, we take steps to ensure that it's treated securely. When your data is used by Central, its purpose, access and processing is managed by a <u>Data Governance Policy</u>. Formal data sharing agreements are in place with those third parties (see above) with whom Central shares your personal data.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure, although we aim to provide every page on our websites as secure https. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. 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.

Transferring your information outside of Europe

If you use our services while you are outside the European Union ("EU"), your information may be transferred outside the EU in order to provide you with those services.

Sometimes your data may be held on a School system where it is necessary to process your information outside of the EU or European Economic Area (EEA). This might be where support staff for the system work outside of the EU/EEA or where the software supplier stores data outside of the EU/EEA. Central attempts to only use suppliers and systems that operate within the EU/EEA, so when these instances occur we are asked to be notified so that we can decide how best to continue providing our services to students whilst keeping their personal data safe. In such circumstances, your personal data will only be processed on one of the following bases:

- Where the processing is subject to appropriate safeguards prescribed by applicable law
- Where a European Commission decision exists that the country or territory provides an adequate level of protection
- Where there exists another situation where the processing is permitted under applicable law, such as your explicit consent.

Changes to this policy

We keep this policy under regular review. This policy was last updated on 23rd May 2023.

Complaints or queries

We take any complaints we receive about the use and security of your personal information very seriously. If you think that our collection or use of your information is unfair, misleading or inappropriate please <u>contact Central's Data Protection Officer by email</u> or write to them at The Royal Central School of Speech and Drama, 62-64 Eton Avenue, London NW3 3HY.

We would also welcome your suggestions for improving our procedures.