

Rose Bruford College of Theatre and Performance

Student privacy notice

Rose Bruford College is committed to protecting any personal information provided to us and to meet our duties under data protection legislation.

About this document

This privacy notice explains how Rose Bruford College ("we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of Rose Bruford College ("you", "your").

Rose Bruford College is the data controller of your personal data and is subject to the Data Protection Act 1998 ("DPA") (and, once in force, to the General Data Protection Regulation (the "GDPR")).

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at Rose Bruford College;
- when you apply to study at Rose Bruford College and complete application forms via the Universities and Colleges Admissions Service (UCAS) and when you complete other admissions processes and procedures;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- in various other ways as you interact with us during your time as a student of Rose Bruford College, for the various purposes set out below;
- from third parties, for example from your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.

The types of information we collect

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number;
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of

your suitability to receive a bursary or in order to provide you with appropriate pastoral care;

- sensitive personal data as well as information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (e.g. disability and dietary needs);
 - certain criminal convictions; and
 - information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

How we use information about our students

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- recruitment and admissions;
- academic matters, including:
 - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation);
 - maintaining student records;
 - assessing your eligibility for bursaries and scholarships, etc.
- providing library, IT and information services;
- non-academic matters in support of our core services, including:
 - providing student support services (e.g. dyslexia assessments, counselling provision etc);
 - monitoring equal opportunities;
 - safeguarding and promoting the welfare of students;
 - ensuring students' safety and security;
 - managing student accommodation;
 - managing the use of social media;
- administering finance (e.g. fees, scholarships and bursaries);
- other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
 - providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);
 - promoting our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus);
 - preventing and detecting crime;
 - dealing with grievances and disciplinary actions;
 - dealing with complaints and enquiries.

Graduation and degree information

Personal data will be published in graduation brochure. All published details will be available on request following the relevant graduation events.

You may withhold your consent to your name being published for these purposes when you register online to attend the award ceremony or graduate *in absentia*

The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus or answer enquiries about our courses);
- once you have enrolled, to provide you with the services as set out in our Student Contract;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Student Contract but which are nevertheless a part of our academic and educational mission;
- to monitor and evaluate the performance and effectiveness of the College, including by training our staff or monitoring their performance;
- to maintain and improve the academic, corporate, financial, estate and human resource management of the College;
- to promote equality and diversity throughout the College;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- recovering money you owe to us;
- for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
 - academic staff will receive information on disability disclosure to ensure that students receive the support they need;
 - third parties who work with us to provide student accommodation;
 - third parties who work with us to provide student support services (e.g. counselling);
 - organisations operating anti-plagiarism software on our behalf (such as URKUND);
 - internal and external auditors.
- those with an interest in tracking student progress and attendance, including:
 - student sponsors (e.g. the Student Loan Company);
 - current or potential education providers (for example, where you take part in an exchange programme as part of your course);
 - current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
- government departments and agencies where we have a statutory obligation to provide information (e.g. Office for Students (OfS), the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));
- crime prevention or detection agencies;
- parents, guardians, and next-of-kin (only where there is a legitimate reason for disclosure);
- third parties conducting surveys, for example the National Student Survey.

International data transfers

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

Students' Union

We share some of the information we hold about you (including your name, nationality, College email address and programme of study) with the Students' Union (SU) at Rose Bruford College unless you notify us that you wish to opt out of SU membership.

The College's SU use this information to administer membership of the Students' Union.

Fundraising and Alumni Relations

We pass certain of your personal data to our Head of Development and Alumni Relations when you graduate. This information will be used for alumni activities, including sending Rose Bruford College publications, promotion of alumni benefits, services, events and programmes. Your personal data may also be used in fundraising programmes.

Please see our separate alumni privacy notice.

If you do not want your personal data to be used for any of these purposes, please email: andrew.scanlan@bruford.ac.uk

HESA

We will send some of the student information we hold to the Higher Education Statistics Agency ("HESA"). HESA collects and is responsible for the database in which HESA student records are stored. Details of how HESA will process this information can be found at: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>.

National Student Survey and Leaver Surveys

We may pass student contact details to survey contractors to carry out the National Student Survey and surveys of student finances for the organisations identified by HESA in their data protection notices referred to above. These organisations and their contractors will use student's details only for this purpose, and will then delete them.

All UK universities are obliged to give contact details for a sample of recent graduates to HESA (The Higher Education Statistics Agency) in order to conduct a survey of graduate destinations.

Graduates from November 2017 onward will be contacted 15 months after graduation. (The “Graduate Outcomes” survey, which replaces the DLHE survey from 2017/18).

These surveys help to inform government policy. They are also used in calculations for university league tables and by the universities themselves to assess the longer-term impact of the student experience. The data is provided to HESA strictly and solely for this purpose. All recent graduates to whom this applies will be given the option to opt out of the survey when they are first contacted.

If you do not want to take part in any of these surveys, please contact the Academic Registrar angela.taylor@bruford.ac.uk

Securing your personal data

Your personal data is held securely within the College. Access to the data is controlled. Staff processing the data receive relevant training on data protection and information security.

From time to time, the College may commission agents of a third party to enhance the systems storing your personal data. Where this occurs they will act strictly in accordance with the instructions given by the College, scheduled within a data sharing agreement, so that your personal data remains secure.

Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. Please contact your Programme Administrator.

How long your information is kept

The College will only retain your personal data for as long as there is a lawful reason to do so, unless you request that it is removed from the College’s records.

Please note that some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes (or by the Head of Development and Alumni Relations for the purposes of supporting your lifelong relationship with Rose Bruford College).

Your rights

Under the DPA you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.

The GDPR came into force in May 2018 and granted you the following additional rights:

- to require us to correct the personal data we hold about you if it is incorrect;

- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact the Secretary & Registrar using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

Contact us

If you have any queries about this privacy notice or how we process your personal data or to request access to the personal data that we hold about you, you can contact our Data Protection Officer by email: ruth.bourne@bruford.ac.uk; by telephone: 0208 308 2612; or by post: Secretary & Registrar, Rose Bruford College, Lamorbey Park, Burnt Oak Lane, Kent DA15 9DF.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.