

# London Contemporary Dance School (The Place)

## Privacy Notice

June 2024

Name of Policy Writer	Lead Post Holder	Date approved	Approved by	Review Date
B. Burrage	Quality and Compliance Manager	June 2024	Academic Board	June 2027

## **Privacy Notice for past, present and prospective students of London Contemporary Dance School**

### **1. Introduction**

This privacy notice explains how London Contemporary Dance School (LCDS) and The Place collects, uses and shares your personal data, and your rights in relation to your personal data LCDS holds. This privacy notice concerns LCDS's processing of personal data of past, present and prospective students of LCDS.

LCDS is part of the Contemporary Dance Trust (trading as The Place), which is a data controller in terms of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) which came into effect on the 25<sup>th</sup> May 2018. The Place is registered with the Information Commissioners Office (ICO).

### **2. How LCDS collects your Information**

Information about you will be collected by LCDS in a number of ways:

- When you apply or register to study at LCDS we will collect data to allow us to administer your studies.
- If you express an interest in LCDS we will ask you to provide us with some information so we can communicate with you effectively.
- In various other ways during the course of your studies, for example, when you interact with LCDS and The Place Services.
- LCDS may, at times, ask third parties for information about you such as your school, funder, student loan provider or employer.

### **3. What Information LCDS collects**

LCDS and The Place 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 and your passport number, country of domicile and your nationality.
- Information relating to your education and employment history including where you have worked, dates of study and examination results.
- Records relating to assessments of your work, details of examinations taken, your examination grades, personal tutor meetings, attendance records and other information in your student record.
- Bank details, used to pay bursary and other payments.
- Audio-visual, both photos and videos.
- Sensitive personal data or special category data:
  - health and medical conditions
  - certain criminal convictions
  - racial or ethnic origin
  - religion or similar beliefs
  - sexual orientation

#### **4. Special categories of data**

Data about: health, ethnic origin, religious or political opinions, sexual life, criminal convictions is identified by the GDPR as “special categories of data”, and this information requires additional conditions to be met before it can be processed. We may collect and process such information in order to comply with legal obligations on equal opportunities monitoring, to comply with regulatory returns as set out by our regulating bodies, and for the purposes of running participatory activities safely.

When collecting and processing data in one or more of these special categories, we will outline the specific purpose of the data collection at the point of collection and seek explicit consent when collecting health information to be used to enable safe practice in the delivery of learning activities.

#### **5. How LCDS uses your information**

LCDS will use your information in different ways including:

- administer your studies, including sharing assessment work, photos and videos with relevant faculty and external stakeholders, such as External Examiners;
- administer bursaries and student loans, both in the UK and overseas;
- enrol students with the University of the Arts London (UAL) and University of the Arts Singapore (UAS);
- complete statutory data returns as set out by regulatory bodies as required
- give access to and ensure the security of The Place Facilities (Building, Library and IT);
- provide student support services (careers, learning support);
- carry out legal duties, providing information to others (Local Councils, Transport for London);
- provide other activities within LCDS and The Place's business including developing and maintaining our alumni programme;
- conduct equal opportunities monitoring and equality impact assessments using your 'Protected Characteristic data'.
- record, edit, digitally archive and share via password-protected online platform videos of you in performances or classes.

#### **6. The legal basis for processing your information**

LCDS relies on several different legal basis depending on the processing being performed:

(Article 6(1)(a)), Consent – on specific occasions LCDS will only process certain data if you consent e.g. on registration you only need to provide certain “special categories” of data if you agree to that.

(Article 6 (1)(b)), necessary for the performance of your student contract – on many occasions LCDS will process your data to enable it to meet its commitments to you e.g. those relating to education and assessment.

(Article 6 (1)(c)), necessary to comply with a legal obligation – LCDS may have legal obligations to provide your personal data to others e.g. HESA.

(Article 6 (1)(d)), for the purpose of protecting the vital interest of yourself or another – sometimes in extreme circumstances LCDS will have to release information to protect your interests or the interests of others e.g. in medical emergencies.

(Article 6 (1)(e)), processing necessary for the performance of a task carried in the public interest – LCDS is an educational and research establishment and in particular its educational and research activity is conducted in a public interest (including your interest and the interest of others).

(Article 6 (1)(f)), processing is necessary for the purposes of the legitimate interest of LCDS or a third party subject to overridden interests of the data subject – LCDS (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be its *Alumni* activities.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which it is collected.

## **7. Others LCDS shares your information with**

Where necessary LCDS will disclose, outside the institution, relevant items of your personal data as set out below.

- Sponsors or funding organisations (including the Student Loans Company) where a contract exists and in accordance with the terms of the contract (which usually relate to attendance and progress reports). This does not include third parties (such as parents) who may be paying for your studies but with whom no formal contract exists;
- Overseas Student Loan agencies, for example the US Department of Education, where information is submitted via secure web based applications;
- Work Placement sites or other educational partners involved in joint course provision where this is necessary for the purposes of your study;
- The Office for Students (OfS) and its agents such as the Higher Education Statistics Agency (HESA), the National Student Survey (NSS), the Graduate Outcome Survey and the Quality Assurance Agency (QAA). You are also advised to refer to the collection notices on the HESA website for further details: [www.HESA.ac.uk](http://www.HESA.ac.uk);
- Potential employers or providers of education whom you have approached for the purposes of confirming your qualifications;
- Local Government Departments, including Council Tax, Electoral Services and Transport for London for the purpose of assessing and collecting Council Tax and or supporting your registration to vote in elections;
- UK Agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, collection of a tax or duty, or safeguarding national security For example: Benefit or Tax Inspectors, the Police, the UK Visas and Immigration (UKVI)

or the Foreign and Commonwealth Office, as necessary, and with consideration of your rights and freedoms;

- External examiners, and the University of Kent and University of the Arts London, which validates the LCDS degrees.

## **8. Use of third party Data Processors**

In addition LCDS and The Place employ the services of various suppliers and agents as data processors. We use such third party Data Processors to collect and process some of the data you provide. We ensure that these data processors process and store your data securely and do not share your data with anyone other than The Place.

## **9. Data retention**

LCDS and The Place retain personal information they collect from you where there is an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When there is no ongoing legitimate business need to process your personal information, LCDS and The Place will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then LCDS will securely store your personal information and isolate it from any further processing until deletion is possible.

## **10. Your rights**

You have rights over your personal data held by The Place as set out in the GDPR. These include:

- Rights to access your personal data to be provided by LCDS and The Place within one calendar month – known as a Subject Access Requests (Article 15) This includes information on:
  - A description of your data
  - The Recipients of your data
  - A copy of your data
- Rights to rectification and erasure. You have the right to correct any inaccurate personal data held by LCDS and The Place. Once information LCDS and The Place has collected is no longer necessary for the purpose for which it was collected and processed, you sometimes have the right to have your data erased.
- Rights to restriction of processing
  - You sometimes have the right to restrict the processing of your personal data or object to the processing of your data.
  - If you wish to withdraw consent for the processing of your personal data or otherwise restrict or object to the processing of your personal data please contact the School Office in the first instance.
- Rights to data portability. You have the right to receive your personal data LCDS and The Place hold in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from LCDS or The Place.

## **11. Changes to this notice**

LCDS and The Place may amend this privacy notice and will occasionally update to reflect student feedback and enhance its accessibility.

In that case, LCDS will post notice of the change on its website and LCDS encourages you to periodically review this notice to be informed of how the institution is protecting your privacy.

## **12. Contact details**

Should you have any concerns about your personal data at LCDS please contact The Place's Data Protection Officer (DPO) by:

Email: [Data.Protection@theplace.org.uk](mailto:Data.Protection@theplace.org.uk)

Post: Data Protection Officer, The Place, 16 Flaxman Terrace, London WC1H 9AT