

Bristol Old Vic Theatre School Student Data Processing Statement

1. What is this notice?

This notice provides you with information about how and why BRISTOL OLD VIC THEATRE SCHOOL (“the School”) collects, holds, uses and in some instances may share your personal information in accordance with the provisions of applicable Data Protection legislation. This notice may be updated from time to time to ensure continued compliance with current legislation and to reflect best practice. The School is a data controller as defined by the Data Protection legislation.

Queries regarding this Privacy Notice or your statutory data protection rights (see Your Rights below) should be directed in writing to the School’s Data Protection Officer whose contact details are as follows:

The Finance Director
Bristol Old Vic Theatre School
1-2 Downside Road
Clifton
Bristol BS8 2XF

Students of the School are also registered as students of the University of the West of England (UWE) and the Conservatoire for Dance and Drama (CDD). Therefore [UWE’s Student Data Privacy Notice](#) and the [CDD Data Processing Statements](#) also apply.

2. Why do we process your personal data?

2.1 Becoming and being a BOVTS student

When you make an application, accept an offer and register as a student at the School, we need to process your personal data for the purposes of entering into a contractual relationship with you and then administer that relationship for example to provide you with services (both academic and non-academic) and to meet our obligations to you as outlined in the [School’s Terms & Conditions](#). In particular your personal data will be processed for the following purposes:

- Administering and managing your educational programme and qualifications and matters connected to your studies or your apprenticeship;
- Communicating information to you relating to your studies;
- Providing services including accommodation, academic skills, student support, advice and guidance, security, health and safety, information and communications technology;
- Fulfilling our obligations under [UWE’s Academic Regulations and Procedures](#) (see Appendix 1 in the [School’s Terms and Conditions](#));
- Responding to any complaints you make to us;
- Monitoring, quality assuring and auditing our activities;
- Undertaking evaluation and research specifically intended to better understand student needs in order to improve our provision;

- using photographic images of students in School publications and on the Bristol Old Vic Theatre School website. However the School will not publish photographs of individual Students with their names on the Bristol Old Vic Theatre School website without the express agreement of the appropriate individual.
- For fundraising, marketing or promotional purposes.

Inability to process this information could limit the services the School is able to provide you with and could thus be detrimental to your overall educational experience and you financially (for example if we cannot administer financial support for your studies).

2.2 Legal Obligations

Sometimes the School will be required by law to process your personal data. For students with a Tier 4 visa coming to study at the School, as part of the Points Based System for immigration, we, as your immigration sponsor are required to take and store a copy of your current passport and visa. This is a mandatory requirement of your visa as specified by the UK Visas and Immigration Department. The School fulfils this requirement by taking electronic scans of these documents:

- The information is required to support your registration as an international student under the points based system and will be transferred to our student record system.
- The scanned copies of your passport and visa will be held for a minimum of one year following the completion of your studies.
- The information will only be made available to the School staff involved with the processing of your registration and student record.

We may disclose your attendance and progression information to your Employer and/or sponsor on receipt of a legitimate request, if the following circumstances apply:

- Your tuition fees are being paid by your employer or sponsor
- You are paying your own tuition fees, but are allowed paid time off work by your employer to attend the School

2.3 Emergency Situations (vital interests)

Sometimes the School may need to process your personal data and/or sensitive personal data ("special categories") without your consent in situations it deems to be critical or an emergency (for example if you have an accident or are taken unwell).

2.4 Public Interest

The School may also process your data for tasks in the public interest most notably when sharing your data with organisations such as the Higher Education Statistics Agency (HESA), for the purpose of fulfilling statutory functions (see section 4).

2.5 Legitimate Interests of the School or a Third Party

In some circumstances the School will process your personal data in pursuance of our own legitimate interests or those of a third party. Where this is the case the School will always take into account your privacy rights and expectations and acknowledges your right to object to such processing. Processing in pursuance of legitimate interests occurs in the following contexts:

The School will maintain your personal data after you graduate for the purpose of maintaining links with its Alumni and friends. Full details are available via the School's Alumni Data Privacy Statement and the [UWE Alumni Privacy Notice](#).

Cybersecurity/network security – e.g. detecting viruses and malware on UWE systems: In some instances the School will process your personal data in order to maintain and enhance the security of its IT systems.

Attendance recording and learner engagement. We may record your educational attendance to inform our decision making and enhance the overall learning experience for example in reviewing programme content, structure and delivery methods.

Other legitimate interests will include upholding the School’s regulations for example in detecting assessment offences or our legitimate business interests such as promoting events that relate to your studies.

2.6 Sensitive Personal Data

In certain instances the University will process your sensitive personal data (“special categories” of data). In such cases it will either get your explicit consent or only process the data without your consent in very limited circumstances and under a relevant other lawful basis such as meeting our legal obligations with regard to reasonable adjustments or a matter of substantial public interest including where there is a risk of harm to yourself or others.

3. Data Obtained from Third Parties

The School will obtain and process your personal data from the following third parties.

| Who data obtained from | Why |
|---|---|
| University Colleges Admissions Service (UCAS) | In order to process your application according to conditions outlined in UCAS Privacy Policy . More information is available in section 4.1 of the Admissions Policy. |
| Placement providers | Administration and assessment of programme of study |
| Other Education providers and partners | Administration and assessment of programme of study |

4. Who Do We Share Your Data With and Why

The School may on occasion share your personal data with the following third parties.

| Who data shared with | Why |
|---|---|
| Parents/spouses/family members/designated emergency contacts | Only in exceptional circumstances. For example, where a student has authorised disclosure (in writing), has asked the relative to act as his/her advocate in a dispute with the University or where the University deems that there is a threat to your vital interest |
| Reporting and regulatory agencies | Enable them to carry out tasks in the public interest (according to their statutory functions). These agencies include HESA, external stakeholders, funding councils or bodies, such as Student Finance England, sponsor organisations, other educational establishments and public health authorities |
| Benefits Agencies, Government Departments, NHS Counter Fraud Department, Local Government Council Tax Departments | In cases of alleged fraud, we will usually co-operate for the purposes of preventing and/or detecting crime. Benefits agencies may request information relating to dates of attendance which, usually with the student’s authorisation, may be provided in response to a written request. Any other requests for information will be declined |
| Police forces and other law enforcement | Our practice is to co-operate with the police in the detection |

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| agencies | and prevention of crime, and to alert appropriate authorities should we consider you, or someone associated with you, to be at potential risk of exploitation or harm. |
| Home Office UKVI | See section 2.2 |
| Potential employers, employment agencies and other educational establishments | Academic references may be provided without the explicit written consent of the student as long as the request is in writing from a bona fide employer or agency. The information released will be the minimum relevant to the request – usually attendance and award details |
| Graduate Surveys | We or an authorised agent will contact you as part of the Destination of Leavers from Higher Education (DLHE) survey. All data collected by the School will be forwarded to the HESA for use in anonymised form, primarily for statistical analysis by HESA. You are advised to refer to HESA's data protection information for further information. |
| Work placement providers or educational partners involved in the delivery of your programme of study | Where this is necessary for delivery of your programme of study (see Terms and Conditions). |
| Sponsors (including Local Education Authorities, overseas governments and the Student Loans Company) where a contract exists with you. | In accordance with the terms of the contract (which usually relates to attendance and progress reports). Note this does not include anyone who may be paying money toward your studies and where there is no formal contract i.e. parents, employers. In such circumstances disclosure will only be made with your consent. |
| Debt recovery agents | The School may pass information to authorised third parties contracted to recover unpaid debt owed in pursuance of its legitimate financial interests. |

5. International Transfers

In certain circumstances your personal data may be transferred overseas (outside the EEA). In such instances transfers will be protected by appropriate safeguards for example an “adequacy decision” by the European Commission or contractual obligations.

6. How Long Do We Keep Your Data For?

Generally records of your studies will be kept for up to six years after you leave the School and then will be destroyed securely. All graduates automatically become members of both the School and UWE's Alumni community. As such, some personal data is processed beyond graduation in order to keep you informed of developments and to offer engagement opportunities. Further information on what data is kept and how it will be used is available via the School's Alumni Data Privacy Statement and UWE's Alumni Privacy Notice.

UWE will retain your personal information in line with the UWE Records Management Policy and Records Retention Schedules. UWE will also maintain a core student record of your studies that it keeps permanently.

7. Automated Decision Making

The School will not process your personal data and profile/make decisions about you solely by automated means.

8. Your Rights

Under the Data Protection legislation you have the following qualified rights:

- (1) The right to access your personal data held by or on behalf of the University
- (2) The right to rectification if the information is inaccurate or incomplete
- (3) The right to restrict processing and/or erasure of your personal data
- (4) The right to data portability
- (5) The right to object to processing
- (6) The right to object to automated decision making and profiling
- (7) The right to complain to the Information Commissioner's Office (ICO)

If you wish to exercise any of these rights please contact the Data Protection Officer (see Section 1).