Privacy Notice: HE Students

Policy owner:	Northern School of Contemporary Dance – Leadership Team
Lead contact:	IT Systems Manager / Data Protection Officer
Audience:	Applicants/Students/ registered at Northern School of Contemporary Dance Courses of higher education, including those enrolled through NSCD's franchise partner providers.
Approving body:	Northern School of Contemporary Dance: Audit Committee
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Related Statutes, Ordinances, General Regulations	Annex A.1: Academic Regulations & Credit Framework
Related Policies, Procedures and Guidance:	IT use policy, Data Protection Policies
UK Quality Code reference:	
OfS Conditions reference:	C Conditions (Protecting the interests of students)
Equality and Diversity Considerations:	Policy should be available in accessible format for all students.

Further information:

For queries relating to this policy please contact quality.office@nscd.ac.uk

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Privacy Notice – HE Students

1. INFORMATION YOU NEED TO KNOW

Northern School of Contemporary Dance (NSCD) is the Data Controller for the personal data we hold about you. As Data Controller, NSCD determines the purposes and means by which your personal data is processed. NSCD is registered with the Information Commissioner's Office (ICO) under registration number is Z5154553.

NSCD needs to obtain and process a range of information about its students in order to exercise its responsibilities and fulfil its education, training and support obligations to you, and to carry out other essential School activities.

Our Data Protection Officer (DPO) advises the School on how to comply with data protection legislation and manages and coordinates requests made under UK GDPR. You can contact the DPO at:

Data Protection Officer

Northern School of Contemporary Dance

98 Chapeltown Road, Leeds, LS7 4BH

Dataprotection@nscd.ac.uk

If you believe we are not applying the law appropriately, you can complain to us using our Public Complaints process or Student Complaints Policy for registered students.

You also have the right to complain to the Information Commissioner's Office (ICO):

https://ico.org.uk/make-a-complaint/

NSCD takes your privacy very seriously. This privacy notice explains how we use your personal information and your rights regarding that information. We are committed to being transparent about how we collect and use your data and to meeting our data protection obligations.

2. SCOPE OF THIS NOTICE

This notice applies to:

- All students enrolled directly with NSCD on Higher Education programmes.
- All students enrolled on NSCD-validated programmes delivered by NSCD's validated partner providers (see Section 10 for further detail).

If you are studying at a validated partner provider, please also read that organisation's own privacy notice, as they will act as a separate Data Controller in respect of data they process for their own institutional purposes.

3. WHAT INFORMATION ARE WE COLLECTING?

We collect a range of information about you – for recruitment, enrolment and admissions purposes, to deliver and administer your higher education and to support you through your student learning journey with us.

We will hold your application, your funding arrangements, details of your programme of study and your academic achievement.

As you progress through your course, we will collect attendance, assessment and achievement and graduation information about you and, later, your destination and progression decisions.

Personal Data may also contain 'Special Category Data', which means any personal data about your racial or ethnic origin, religious or philosophical beliefs, health, sexual orientation, or your biometric data. See Section 5 for the legal basis on which we process this data.

When you engage with NSCD student services, we will collect details necessary to provide that service to you, for example for advice and wellbeing support, pastoral services, and bodywork support. Sometimes the information we seek will purely act as a baseline or starting point to monitor future support actions (e.g. weight and height). Where this is the case we have strict protocols in place to ensure only the right people can access this information; it is gathered through a closed system (such as our VLE, Moodle) and the rationale for data collection has gone through our ethics committee protocols.

We will also collect information so that we can comply with our health and safety and management duties, as well as for research, statistical and archival purposes.

Due to the nature of our courses, we will also collect information in other formats including audio and visual recordings in a variety of contexts (including classes, performances, presentations, lectures and other learning activities), images, photographs and showreels.

In all cases, we will hold your name, contact details, date of birth, nationality and immigration status, and emergency contact details.

At registration, we capture a photograph of yourself so that we can create your Student ID card. Your photograph will also be used as your profile picture associated with your student account to help staff identify you. You can change or remove the photo at any time.

Your student email account is the primary way you will be contacted by NSCD. The School will use this email account to send you important academic information or advice that may be of benefit to your studies.

At registration, you will also be asked for your contact preferences for emails related to student recruitment and other offers and opportunities. Such emails will only be sent to you with your consent. You have the right to withdraw that consent at any time by contacting the Quality Office or emailing Dataprotection@nscd.ac.uk .

Where we obtain information about you from third parties rather than directly from you, those sources may include:

- Previous educational institutions (references and transcripts)
- The Student Loans Company (funding and fee information)
- Validated partner providers (enrolment and attendance data relating to students on partner-delivered programmes)
- NHS and other health professionals (with your consent, where relevant to disability support)

This list is not exhaustive and you will be given specific information when using a particular service. Please do not hesitate to ask us about any specific circumstances where your data has been collected.

4. HOW DOES THE SCHOOL PROTECT YOUR DATA?

The School takes data protection very seriously. The information we collect is stored safely and securely and processed in accordance with UK GDPR and the DPA 2018.

Your personal data will be handled in line with the School's Data Protection Policy and Information Security Policy. Where we engage third-party processors to handle data on our behalf, we ensure that appropriate Data Processing Agreements (DPAs) are in place in accordance with Article 28 UK GDPR.

5. WHY ARE WE COLLECTING YOUR DATA AND WHAT IS THE LEGAL BASIS FOR THIS?

We need to collect personal data from you for several reasons. The table below sets out the main purposes and the legal basis that applies under Article 6 of the UK GDPR:

Purpose	Art. 6 Legal Basis	Art. 9(2) Basis (if special category data involved)
Enrolment, registration, and administration of your studies	Art. 6(1)(b) – Contract	N/A (unless health/disability data collected – see below)
Monitoring attendance and academic progress	Art. 6(1)(e) – Public task (provision of HE)	N/A
Health, disability and learner support	Art. 6(1)(c) – Legal obligation / Art. 6(1)(e) – Public task	Art. 9(2)(h) – Health & social care / Art. 9(2)(b) – Employment & social protection (DPA 2018 Sch. 1)
Financial and fees administration	Art. 6(1)(b) – Contract	N/A
Statutory reporting (OfS, HESA, SLC, ESFA)	Art. 6(1)(c) – Legal obligation	Art. 9(2)(g) – Substantial public interest (DPA 2018 Sch. 1 para. 6)

Purpose	Art. 6 Legal Basis	Art. 9(2) Basis (if special category data involved)
Visa sponsorship and immigration compliance (Student Route)	Art. 6(1)(c) – Legal obligation	Art. 9(2)(g) – Substantial public interest
Research, statistical analysis and quality assurance	Art. 6(1)(e) – Public task	Art. 9(2)(j) – Scientific/historical research (DPA 2018 s. 19)
Audio/visual recordings (performances, classes, etc.)	Art. 6(1)(b) – Contract / Art. 6(1)(a) – Consent (where recordings are shared externally)	N/A
Alumni relations and post-graduation contact	Art. 6(1)(a) – Consent	N/A
Marketing and recruitment communications	Art. 6(1)(a) – Consent	N/A
Legitimate interests (e.g. IT security, fraud prevention)	Art. 6(1)(f) – Legitimate interests	N/A

Where we rely on your consent, you have the right to withdraw it at any time without detriment to your studies, except where the processing was already completed before withdrawal. To withdraw consent, contact the Quality Office or DPO.

6. WHO HAS ACCESS TO THIS DATA?

Your personal data will only be processed by relevant NSCD staff where the data is necessary for them to undertake their designated role. Examples of relevant staff include:

- The leadership team, for reporting and monitoring purposes
- Your Academic Tutors
- Quality Office staff
- Student Finance
- Student Services & Student Support
- Admissions
- Alumni Services and other teams such as NSCD Marketing that you engage with
- IT Services
- Security

We may also be required to share your information with some external parties. Examples of external parties include:

- Local Authorities (e.g. for council tax and other benefit purposes, including fraudulent claims)
- Relevant government departments and other public bodies to which the School has a statutory obligation to release information, including the Student Loans Company, The Office for Students (OfS), the Quality Assurance Agency (QAA), the Education and Skills Funding Agency (ESFA), and/or equivalent bodies from other countries

- The Higher Education Statistics Agency (HESA). Details on how HESA processes your personal data are set out in the HESA Student Data Collection Notice, available at: https://www.hesa.ac.uk/about/regulation/data-protection/notices
- Police and other law enforcement agencies, when they make a request for the purposes of detecting or preventing crime or the apprehension and prosecution of offenders
- Providers of software we use, or organisers of events, for a strict and documented purpose, under a Data Processing Agreement
- As a licensed Student Route sponsor, we may be required to give information to UK Visas and Immigration (UKVI) about sponsored students. Our sponsorship duties include informing UKVI if a student fails to register, withdraws, or fails to attend classes and submit work.
- External examiners and assessors.

We will not share your data with parents without your consent, other than in very serious emergency circumstances. All necessary information will be issued to you, the student, directly.

In some cases, the School may ask you to sign an agreement to provide information directly to a third party connected to your studies such as a placement provider. You are giving your explicit permission for the School to provide this information in those circumstances.

Student email addresses are published in the School's Outlook Address Book for internal access only. You should not pass on anybody's email address without their express permission.

7. FOR HOW LONG DOES THE SCHOOL KEEP YOUR DATA?

Your personal data will only be kept for as long as is necessary for the purposes for which it was collected, or as required by law. Our Records Retention Schedule sets out the retention period for each category of record. The table below provides indicative periods for the main categories:

Category of record	Indicative retention period	Legal basis for retention
Student academic records (transcripts, qualifications)	Permanently (core academic record)	Public task / Legal obligation
Application and admissions records (including visa related records)	3 years from end of application / enrolment	Contract / Legal obligation
Financial and fees data	7 years from end of student relationship	Legal obligation (HMRC)
Health and disability / welfare records	6 years from graduation / last contact	Legal obligation / Public task
Attendance and assessment data	6 years post-graduation	Contract / Public task

Category of record	Indicative retention period	Legal basis for retention
Audio/visual recordings (performances, classes)	As specified at point of collection	Contract / Consent
Alumni contact data (where consent given)	Until consent withdrawn	Consent

These are indicative periods only. The full Records Retention Schedule is available from the DPO on request.

8. TRANSFERS OF DATA OUTSIDE THE UK

Generally, we do not send your personal data outside the UK. However, in some specific cases we may need to transfer personal data to countries outside the UK in order to perform our contract with you or to fulfil a contract with another organisation that requires your personal data (for example, a collaboration agreement with an institution based outside the UK as part of a study abroad programme).

Where we transfer data outside the UK, we will only do so where one of the following safeguards is in place:

- The destination country has been granted an adequacy regulation by the UK Secretary of State;
- Appropriate safeguards are in place, such as UK-approved Standard Contractual Clauses (SCCs), Binding Corporate Rules, or another mechanism permitted under Articles 44–49 UK GDPR;
- A specific derogation under Article 49 applies (e.g. the transfer is necessary for the performance of a contract with you and no safeguard is feasible).

We also require organisations that we send data to, to have appropriate data protection processes in pace.

We will inform you in advance of any such transfer and can provide further details on request from the DPO.

9. AUTOMATED DECISION MAKING AND PROFILING

NSCD does not make solely automated decisions about you that have legal or similarly significant effects (within the meaning of Article 22 UK GDPR). All decisions affecting you will be taken by a human being.

10. VALIDATED PARTNER PROVIDERS

Some NSCD Higher Education programmes are delivered by organisations with whom NSCD has a formal validation agreement (‘validated partner providers’). If you are enrolled on a programme delivered by a validated partner provider, the following applies to the processing of your personal data.

10.1 Data Controller arrangements

In the context of NSCD-validated programmes:

- NSCD acts as Data Controller in respect of your personal data held for the purpose of awarding and quality-assuring your qualification (e.g. academic records, assessment outcomes, and statutory returns to OfS and HESA).
- Your validated partner provider acts as a separate Data Controller in respect of the data they process for their own institutional purposes (e.g. their own student records, welfare, and finance systems).
- In some circumstances, NSCD and the validated partner provider may act as Joint Controllers under Article 26 UK GDPR where both organisations jointly determine the purposes and means of processing the same data. Where this is the case, a Joint Controller Agreement will be in place and you will be informed of the key arrangements.

10.2 What data does NSCD hold about Franchise partner provider students?

NSCD will receive and hold the following categories of data about you from your validated partner provider, in order to fulfil its degree-awarding and quality assurance responsibilities:

- Enrolment and registration information (name, date of birth, programme of study, enrolment status)
- Assessment records (marks, results, progression decisions)
- Attendance data (where relevant to a statutory reporting obligation or academic progression decision)
- Graduation and award data
- Statutory data required for submission to OfS, HESA, and other regulators
- Information necessary for visa/immigration compliance (where applicable)

NSCD will not routinely hold detailed welfare, financial, or day-to-day pastoral care records for students at partner providers, as those are ordinarily held by the partner institution in its capacity as a separate Data Controller.

10.3 Data sharing with validated partner providers

NSCD may share relevant data with your validated partner provider where necessary to administer your programme, including:

- Confirmation of your enrolment status and programme details
- Assessment and progression decisions
- Communications relating to the quality assurance of your programme

Data sharing between NSCD and validated partner providers is governed by a Data Sharing Agreement, which sets out the purpose, lawful basis, security measures, and responsibilities of each party.

10.4 Your rights as a student at a validated partner provider

You may exercise your data subject rights (see Section 11) with NSCD in respect of data NSCD holds about you, and separately with your validated partner provider in respect of data that institution holds. If you are unsure which organisation holds the data you wish to query, please

contact NSCD's DPO in the first instance and we will assist you in directing your request appropriately.

Your validated partner provider's own privacy notice will set out how that organisation uses your personal data. Please ensure you have also read and understood that notice.

11. YOUR RIGHTS

As a data subject, you have a number of rights under UK GDPR. You have the:

Right to be informed: The right to be informed about the collection and use of your personal data – which this notice fulfils.

Right of access: The right to access and receive a copy of your personal data and other supplementary information (commonly called a Subject Access Request or SAR).

Right to rectification: The right to have inaccurate personal data corrected, or incomplete data completed.

Right to erasure: The right to have personal data erased in certain circumstances ('right to be forgotten'), unless an exemption applies (e.g. where retention is required by law).

Right to restrict processing: The right to request that we restrict or suppress the processing of your personal data in certain circumstances.

Right to data portability: The right to obtain and reuse your personal data for your own purposes across different services (applies where processing is based on consent or contract and is carried out by automated means).

Right to object: The right to object to the processing of your personal data where we rely on public task or legitimate interests as our legal basis, including profiling for those purposes.

Rights related to automated decision-making including profiling: The right not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects. See Section 9 for NSCD's position on this.

To exercise any of these rights, please contact the DPO at Dataprotection@nscd.ac.uk. We will respond within one calendar month. There is no charge for making a request.

You also have the right to lodge a complaint with the ICO at any time: https://ico.org.uk/make-a-complaint/

12. WHAT IF YOU DO NOT PROVIDE DATA?

We require certain information from you to enable us to provide you with an education and to meet our legal obligations. Failure to provide mandatory data may mean we are unable to enrol you, deliver your programme, or meet our statutory reporting requirements.

You will engage with some of our teams on an optional basis, such as Student Advice and Wellbeing and Alumni Services. These teams will only be able to assist you or keep you informed if you choose to provide your information to them.