



Data Protection Policy and Procedure

1. Introduction

London Studio Centre (LSC) is committed to complying with the [Data Protection Act 2018](#), which covers the requirements of the General Data Protection Regulation (GDPR), and best practice in the management of the data it collects and processes in carrying out its duties.

The protection of individuals via the lawful, legitimate, and responsible processing and use of their personal data is a fundamental human right. Individuals may have a varying degree of understanding or concern for the protection of their personal data, and LSC respects their right to have control over that personal data and ensures it always acts in full compliance with legislative and regulatory requirements.

The General Data Protection Regulation (GDPR), as supplemented by the Data Protection Act DPA 2018 (DPA), is the main piece of legislation that governs how personal data is collected and processed. Failure to comply with this legislation may have severe consequences including potential monetary fines for LSC.

LSC is registered with the Information Commissioner's Office, registration number: Z5600252. As LSC is not a public authority it is not covered by the Freedom of Information Act.

2. Policy Statement

This Policy sets out how LSC processes the personal data that it holds relating to students, staff, and third parties. It outlines LSC's responsibilities under data protection legislation and regulation, setting out how it will comply and provide instruction for staff handling personal data.

Compliance with this Policy is mandatory. Any breach of this Policy and any related policies and procedures may result in disciplinary action.

3. Scope

This policy applies to all applicants, current students, alumni, current and former staff of London Studio Centre. Prospective staff and students should also familiarise themselves with this policy.

All members of staff must read, understand, and comply with this Policy when processing personal data in the course of performing their tasks, and must observe and comply with all controls, practices, protocols and training to ensure compliance.

4. Principles

Under GDPR data collectors must ensure that all personal data is:

- Accurate and maintained.
 - Processed lawfully, fairly and in a transparent manner. This is demonstrated in the Lawful Basis column of Appendix 1.
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which it is to be processed. This is outlined in the 'Purpose' column of Appendix 1.
 - Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction, or damage
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- Retention – data that is gathered is stored for a defined period. This is outlined in the Retention Period column of Appendix 1.
- Security – any data that is gathered is held securely.
- International transfers

5. Data subject rights and requests

The GDPR provides data subjects with a number of rights in relation to their personal data. These include:

- Right to withdraw consent: where the lawful basis relied upon by LSC is the data subject's consent, the right to withdraw such consent at any time without having to explain why.
- Right to be informed: the right to be provided with certain information about how we collect and process the data subject's personal data.
- Right of subject access: the right to receive a copy of the personal data that we hold, including certain information about how the data subject's personal data has been processed.
- Right to rectification: the right to have inaccurate personal data corrected or incomplete data completed.
- Right to erasure (right to be forgotten): the right to ask LSC to delete or destroy the data subject's personal data if:
 1. the personal data is no longer necessary in relation to the purposes for which it was collected.
 2. the data subject has withdrawn their consent.
 3. the data subject has objected to the processing.
 4. the processing was unlawful.
 5. the personal data has to be deleted to comply with a legal obligation.
 6. the personal data was collected from a data subject under the age of 13, and they have reached the age of 13.
- Right to restrict processing: the right to ask the LSC to restrict processing if:
 1. the data subject believes their personal data is inaccurate.
 2. the processing was unlawful, and the data subject prefers restriction of processing over erasure.
 3. the personal data is no longer necessary in relation to the purposes for which it was collected but they are required to establish, exercise, or defend a legal claim
 4. the data subject has objected to the processing pending confirmation of whether LSC's legitimate interests' grounds for processing override those of the data subject.
 5. Right to data portability: in limited circumstances, the right to receive or ask LSC to transfer to a third party, a copy of the data subject's personal data in a structured, commonly used readable format.
- Right to object: the right to object to processing where the lawful basis for processing communicated to the data subject was LSC's legitimate interests and the data subject contests those interests.
- Right to object to direct marketing: the right to request that we do not process the data subject's personal data for direct marketing purposes.
- Right to object to decisions based solely on automated processing (including profiling): the right to object to decisions creating legal effects or significantly affecting the data subject which were made solely by automated means, including profiling, and the right to request human intervention.
- Right to be notified of a personal data breach: the right to be notified of a personal data breach which is likely to result in a high risk to the data subject's rights or freedoms.
- Right to complain: the right to make a complaint to the ICO or another appropriate supervisory authority.

1) Data Usage –Students/Applicants

LSC gathers data on applicants, current students and alumni to carry out its day-to-day operations. This includes using data for the following purposes:

- Provide support to applicants/students declaring disabilities
 - Provide progress report to sponsors of students
 - Provide references to education institutions and employers, with the consent of the student or Graduate
 - Publication of the names of graduating students in validating university degree ceremony graduation programmes
 - Disclose information about students and graduates for the purpose of promoting LSC, and to their former schools for the purposes of schools' liaison, and this will be with the consent of the student/graduate if they are personally identifiable
 - For the purposes of academic misconduct detection, such as plagiarism, through the use of *Turnitin*
 - Supply personal and financial details to providers of financial services engaged by LSC, for example in the payment of fees, refunds or loans
 - Disclosing information to external parties for safeguarding and duty of care purposes, for example medical practitioners and law enforcement agencies
 - Produce degree certificate and diploma supplements for students
 - Subject to review on a case-by-case basis, providing contact details to third party companies and organisations formally engaged by LSC to provide enhanced levels of service to support core activities
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A full list of the data gathered on Students/Applicants can be found in Appendix 1.

LSC also passes on applicant/student information to relevant external agencies, which include:

- the Office for Students (OfS)
- Student Loans Company
- local councils for council tax purposes and electoral registration,
- Transport for London (TfL),
- UK Visas and Immigration (UKVI) and
- the Higher Education Statistics Agency (HESA). Data passed onto HESA includes the disclosure of special category data including disability, ethnicity and religion/belief. More information on HESA's use of student data can be found here: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

LSC acts as a data processor for its validating universities, to ensure that students are accurately enrolled with them – this includes initial registration, change of pathway and interruptions and withdrawals.

2) Data Usage – Staff

LSC gathers data about job applicants and staff in the subject of your employment, including information on bank details, appraisal.

A full list of data gathered on Staff can be found in Appendix 2.

3) Data Usage – Other stakeholders

LSC gathers data on other key stakeholders, including visitors to LSC's website, those signed up to LSC's mailing list.

A full list of data gathered on other stakeholders can be found in Appendix 3.

4) CCTV – applies to Students/Applicants, Staff and Other stakeholders who visit LSC

LSC uses CCTV within the West Wing and areas of artsdepot under LSC control for the safety and security of all individuals on site, including prospective students, students, staff, and visitors.

This data is retained in line with the retention period outlined in the schedules appended to this policy. On occasion LSC may pass on CCTV footage to others, such as the police or court/tribunal.

artsdepot are responsible for the CCTV in operation on their premises, which include areas outside of the West Wing, artsdepot building and surrounding area and are not covered by this policy.

5) Contact details

For any questions or data requests relating to this policy please contact:

General queries – Data Protection Officer: dataprotectionofficer@londonstudiocentre.ac.uk

Current students/Former students - Registrar: registrar@londonstudiocentre.ac.uk

Alumni and use of images for purposes other than assessment - Marketing: marketing@londonstudiocentre.ac.uk

Other stakeholders – Marketing: marketing@londonstudiocentre.ac.uk

Staff data – Human Resources: humanresources@londonstudiocentre.ac.uk

6. Complaints

Concerns about LSC's usage of your data or compliance with Data Protection legislation, should be raised with the Data Protection Officer in the first instance, using the contact details outlined above.

If you are dissatisfied with our response you can complain to the Information Commissioner's Officer, and more information on how to do so can be found on their website www.ico.org.uk.

7. Related policies and procedures

CCTV Policy

Prevent Duty Procedure

Safeguarding Policy & Procedure

Effective Date: 08/11/2018	Approved by: Senior Management Group (SMG)
Last Reviewed: 21/12/2022	Review Due: 21/12/2023

APPENDIX 1: STUDENT/APPLICANT RECORD RETENTION SCHEDULE

Applies to	Record Type	Purpose	Retention Period	Legal Basis	Responsibility
Applicants – Did not enrol	<i>Date of application</i> <i>Name</i> <i>D.O.B</i> <i>Ethnicity</i> <i>Gender</i> <i>Contact details</i> <i>Address</i> <i>Course applied for</i> <i>Disability declared</i>	Admissions To aid applicant and Admissions in cases including, but not limited to, repeat applications, gap year, deferral, change of personal circumstances, decliners survey, reporting to the Office for Students	Six years	Consent – when an application is started	Admissions Manager
Applicants and students	<i>Financial details</i>	Finance For payment of audition fee, deposit, tuition fees and other associated costs	Year of graduation/withdrawal/expulsion plus six years	Contract	Financial Controller
Students	Basic Records: <i>Name</i> <i>D.O.B</i> <i>Contact details</i> <i>Emergency contact details</i> <i>Recorded permanent and term time addresses</i> <i>Pathway transfer, withdrawal or termination of studies</i> <i>Transcript and any award</i>	Registry Provision of references. Confirmation of registration and final award. Reporting to HESA; Contact number passed to Ipsos Mori to conduct NSS for final year students	In perpetuity	<ul style="list-style-type: none"> • Contract – at point of enrolment • Consent for NSS - can opt-out 	Registrar
Students	Additional student records including, but not limited to, any documents relating to: <i>Application and admission.</i> <i>Applications for deferral, extenuation</i> <i>Academic appeals, formal complaints and student conduct</i> <i>Attendance monitoring</i> <i>Equality information (including gender, disability, ethnicity and religious belief)</i>	Registry Allows for full academic and employment references to be provided on request; Reporting to HESA, student loans company and UKVI. Includes the limitation period for negligence claims	Year of graduation/withdrawal/expulsion plus six years	<ul style="list-style-type: none"> • Consent – at point application is made • Contract • Legal obligation – LSC is required to report on student data to HESA, OFS, SLC and UKVI 	Registrar
Students	Student welfare notes and evidence <i>Student welfare and medical notes;</i>	Student Welfare Department Allows ongoing support to be offered to the student and shared with other members of staff with the student’s consent	Year of graduation/withdrawal/expulsion plus six years	Consent – when shared with member of Student Welfare Department, additional consent will be sought before disclosing further	Head of Student Welfare

Applies to	Record Type	Purpose	Retention Period	Legal Basis	Responsibility
Students	Assessed work <i>Including audio or visual recording and written submissions but not dissertations/research projects</i>	Academic Administration Students enrolled on the programme consent to being recorded or photographed by signing the Image Release form, consent may be revoked at any time. This could include but is not limited to, class work, assessments, and performances.	Year of graduation/withdrawal/expulsion or final date of any appeal process (whichever is the latest) six years Audio or visually recorded assessed work may also be kept in perpetuity where it may be used for educational purposes. This is stated as a condition of enrolment	<ul style="list-style-type: none"> • Consent • Legitimate interest 	Academic Administrator
Students	Assessed work <i>Dissertations/research projects</i>	Samples of dissertations/research projects may be kept by the library as exemplars for future reference – with the students' consent	Five Years	Consent – contacted if dissertation to be kept as sample	Academic Administrator
Students	Images/Visual representations/ Audio or visual recordings	Marketing Images created during period of study for the purposes of promoting LSC and students (Consent is part of student enrolment contract);	In perpetuity	Consent	Marketing & Communications Officer
Graduates	Images/Visual representations/ Audio or visual recordings	Marketing Images created as part of graduate employment (consent opt-in on graduation)	In perpetuity	Consent	Marketing & Communications Officer
Graduates	Contact details	Alumni Use for graduate mailing lists, invites to LSC events and the Graduate Outcomes Survey. Graduates' opt-in at the point of graduation and can opt-out at any point	In perpetuity	Consent – at point of graduation, student will be emailed to opt in, can opt-out at any point	Alumni Association Administrator
Applicants who audition/current students	Images	I.T. For safety and security	30 days	Legitimate interest	Head of IT & Resources

APPENDIX 2: STAFF RECORD RETENTION SCHEDULE

Applies to	Record Type	Purpose	Retention period	Legal basis	Responsibility
Applicants	Contact details Application details including employment history, post applied for and equal opportunities data	HR To assist HR in shortlisting applicants Monitoring the diversity of candidates who apply	Date of application + 1 year	Consent	Assistant Director
Current staff	Contact details Application details Annual Leave forms Staff Development forms Appraisal forms Payroll information	HR	Date of employment + 6 years	Contract	Assistant Director
Former staff	Contact details Dates of employment	HR To provide references on request	In perpetuity	Contract	Assistant Director
Applicants who attend interview/current staff	Images	Facilities For safety and security	30 days	Legitimate interest	Head of IT & Resources

APPENDIX 3: OTHER STAKEHOLDERS RECORD RETENTION SCHEDULE

Applies to	Record Type	Purpose	Retention period	Legal basis	Responsibility
Website visitors					Marketing & Communications Officer
Mailing List	Contact email	Marketing To inform of LSC news and upcoming events	In perpetuity – can unsubscribe	Consent – opt-in	Marketing & Communications Officer
Other stakeholders who visit LSC	Images	I.T. For safety and security	30 days	Legitimate interest	Head of IT & Resources