

## Student Privacy Notice

(Processing your personal data)

Please read this information before you enrol

*This privacy notice establishes the Academy's procedures governing the collection and release of student information and is provided to students at the application and enrolment stages.*

### General

The Academy needs to collect, process and use personal data (information) for a variety of purposes about those who express an interest in becoming a student of the Academy (prior to application and enrolment stage), those who become enrolled students of the Academy including, its staff and other individuals who come into contact with the Academy.

In collecting, processing and using data the Academy must comply with the requirements of the Data Protection Act 1998 (DPA) and from 25 May 2018 with the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) which govern the processing of personal information. The Backstage Academy Data Protection Policy sets out the rules for adherence to the requirements of data protection laws and is available at:

<https://www.backstage-academy.co.uk/about/governance>

Personal information means any information relating to an identified or identifiable living person. An identifiable person is one who can be identified, directly or indirectly, in particular by an identifier such as a name, identification number, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Processing is any activity carried out involving personal information, including holding and storing it in any format, both digital and hardcopy.

Backstage Academy takes the matter of data security and protection extremely seriously. The personal data you provide to us during the application and enrolment procedure and throughout your time as a student is securely held by the Academy and will be treated confidentially and with sensitivity. Backstage Academy is notified as a Data Controller for all personal information that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller.

Backstage Academy's Information Commissioner's Office data controller registration number is Z2909001.

If you have any questions about our privacy practices, please contact our Data Protection Officer and Head of Institution:

Email: [dpo@backstage-academy.co.uk](mailto:dpo@backstage-academy.co.uk)

Data Protection Officer  
Backstage Academy  
Unit 53  
South Kirkby  
Wakefield  
WF9 3NR

**Changes to this privacy notice**

It is important that you check this privacy notice for updates. If we make changes that we consider to be important, we will let you know by contacting you using the contact details you have provided to us.

## **The types of personal information we collect**

The Academy collects and processes information relating to its students, including images, personal details, family and social circumstances, education and training records and financial details for various academic, administrative and health and safety reasons. The Academy may collect, hold and process what may be considered 'sensitive personal data' as described under the DPA and 'special category personal data' as described under the GDPR.

Sensitive and special category personal data is generally defined as information related to racial or ethnic origin, political opinions, religious or other beliefs, physical or mental health, other medical information including biometric and genetic data. In some instances, the Academy will also collect and process criminal offence data relating to criminal allegations, proceedings, convictions or related security measures.

Not all of the personal information the Academy holds about you will come directly from you. It may, for example, come from other organisations to which you belong or professional service providers. We also collect personal information from third parties such as collaborative partner organisations, service providers offering services provided by the Academy, for example student recruitment representatives, Student Finance England and UCAS.

## **How we secure personal information**

The Academy takes data security seriously and uses appropriate technologies and procedures to protect personal information. Our information security policies and procedures are reviewed regularly and updated as necessary to meet our service needs, changes in technology and regulatory requirements. Further information on data security is published at: <https://www.backstage-academy.co.uk/about/governance>

## **How long we keep personal information**

Information of your course registration and final reward will be kept permanently by the Academy with more detailed information kept for specific retention periods. The Academy's Records Retention and Disposal Policy detailing the retention period for different student records is published at: <https://www.backstage-academy.co.uk/about/governance>

## **Your right to access and correct your personal information**

The Academy respects your right to access and control your information, we will respond to requests for information and, where applicable, will correct, amend or delete your personal information.

You have the following rights:

- request access to your personal information that the Academy holds;
- rectify inaccuracies in your personal data;
- be forgotten - that is your details to be removed from the systems that we use to process your personal data in certain situations;
- restrict the processing of personal data in certain situations;
- object to the processing of personal data in certain situations. For example, sending and receipt of direct marketing material;
- data portability - obtain a copy of your data in a commonly used electronic form in order to provide it to other organisations;
- object to automated decision making and profiling – object to decisions made by automated means without human intervention in certain circumstances;
- withdraw consent where that is the legal basis of processing.

Students must ensure that all personal data provided to the Academy is accurate and up to date. Any changes must be notified to Registry at [studentadmin@backstage-academy.co.uk](mailto:studentadmin@backstage-academy.co.uk)

If you are not happy with how the Academy manages your personal information you should contact the Academy's Registry Manager in the first instance. If you feel that the complaint has not been dealt with to your satisfaction you can formally complain to the Head of Institution.

You also have a right to complain to the Information Commissioner's Office about the way in which we process your personal data at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

### **Student and Leavers Surveys**

You may be asked to provide information about your experience as a student and your activities after you graduate as part of national surveys used to create statistics to meet the public interest in the outcomes of higher education. The surveys may be undertaken by the Academy or by an organisation contracted for that purpose. The Academy will hold your contact details after you graduate in order for you to be contacted to complete a graduate outcomes survey.

Your contact details may be passed to survey contractors to carry out the National Student Survey (NSS), other surveys of students' views about their study, and surveys of student finances, on behalf of some of the organisations listed in the Higher Education Statistics Agency (HESA) statement, see the link below.

Your contact details may be passed to HESA and/or an organisation contracted to undertake a graduate outcomes survey. The survey contractor will only use your contact details for the survey. HESA may hold your contact details for further graduate outcomes surveys where these are in the public interest.

Further privacy and data protection information will be provided if you are contacted for any of these surveys.

After you graduate, the Academy may contact you to ask you to complete the HESA 'Destinations of Leavers from Higher Education' survey.

### **Submission of your information to HESA**

It is a statutory requirement for the Academy to send some of the information we hold about you to HESA every year. HESA is the official source of data about UK universities and higher education colleges, alternative HE providers and recognised higher education courses taught at further education institutions. HESA is a registered charity and operates on a not-for-profit basis.

HESA collects, and is responsible for, the database in which your HESA information is stored. HESA uses your HESA information itself for its own purposes and also shares your HESA information with third parties for specified and lawful purposes. HESA's use of your HESA information may include linking information from it to other data, as described in the HESA student data collection notice, see the link below. All uses of HESA information must comply with the DPA and GDPR.

If you give us information about your disability status, ethnicity, sexual orientation, gender reassignment or religion these may be included in your HESA information and used to assist with monitoring equality of opportunity and eliminating unlawful discrimination in accordance

with the Equality Act 2010. Some other sensitive and special category personal information is used to enable research into the provision of fair access to higher education.

If you are enrolled at a higher education provider in England regulated by the Higher Education Funding Council for England (HEFCE) or Office for Students your HESA information will include details of any financial support you may receive. Your sensitive and special category personal information will not be used to make decisions about you.

**To read the full HESA student data collection notice please visit:**

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>

### **How we process your personal information – legal basis for processing**

It is necessary for the Academy to collect, process and use student data in order to perform the contract between you and the Academy in providing teaching and education support services to students.

The Academy processes your personal data and sensitive and special category personal data for the administration and management of all services and processes relating to you. For example, student recruitment, admission, registration, teaching and learning, attendance monitoring, assessment, graduation and other services such as accommodation, student support services and careers advice. Information is shared between academic and professional support services of the Academy for operational purposes as is necessary and proportionate for the intended purpose.

Some processing activities may also be carried out under a legal obligation (for example, disclosing personal data to external parties under statutory powers), where it is necessary to protect the vital interests of the student or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals), where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements), or where it is necessary for legitimate interests pursued by the Academy or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases do not apply, the consent of an individual to process their personal data will be sought.

Where students' sensitive personal data and special category personal data is collected and processed by the Academy this will be on the legal basis of explicit consent of the student, employment or social security/protection requirements, protecting the vital interests of the student or another party, the exercise or defence of a legal claim, reasons of substantial public interest, purposes of medical or health care or where the information has been made public by the student. Any processing will be proportionate and relate to the provision of services by the Academy.

Table A below sets out the separate categories of personal information that the Academy may hold, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

### **When we share personal information**

This privacy notice includes information about who the Academy may disclose student's personal data, sensitive and special category personal data and criminal offence data to and how student data is used.

Table A below sets out what information the Academy may share with other third parties.

Table A below sets out the separate categories of personal information that the Academy may hold on you, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

**TABLE A**

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Academy and/or External Needs	Legal Basis for Processing (Article 6)
1.	<p><b>Personal Details</b> for Enrolment and Student Number/Identity Card, Academy email address, Equal Opportunities monitoring. Inclusion of photographic images on the Academy's computerised student record system.</p> <p>Name, address (term-time and home), e-mail, telephone numbers, gender, date of birth + age, ethnicity, disability, nationality, religion, qualifications on entry, previous education, emergency contact details.</p>	Manual and electronic	Registry, Academic Support Services, Student Services	Online Enrolment form, personal file, student record database, lists for specific categories of students.	Academy and External	Article 6(1)(b) or (1)(e) or (1)(f)
2.	<p><b>Course Enquiry and Application</b> for processing, tracking, contact analysis, equal opportunities monitoring.</p> <p>Personal details as in 1 above, previous educational establishment, referees and references, correspondence, decision.</p>	Manual and electronic	Recruitment and Admissions, Academic Support Services,	Applicant database, personal file, student record database.	Academy	Article 6(1)(b) or (1)(e) or (1)(f)
3.	<p><b>Course Admission</b>, enrolment and administration of their studies for processing, tracking, contact analysis, equal opportunities monitoring.</p>	Manual and electronic	Recruitment and Admissions, Academic Support Services,	Applicant database, personal file, student record database.	Academy	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f) Article 9(1)(a)

	Personal details as in 1 above, previous educational establishment, referees and references, correspondence, decision					
4.	<b>Course registration for Award.</b> Qualification aim, join and end dates, timetables, academic years, registered modules, registers, award/s achieved.	Manual and electronic	Registry, Academic Support Services, Student Services.	Enrolment form, personal file, student record database, course, exam board, results lists.	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
5.	<b>Academic assessment and progression.</b>  Attendance/withdrawal records for academic action/status.  Change in student status.  Name, ID No., Course details, status, information relating to attendance and/or withdrawal status change and dates, action taken.	Manual and electronic	Academic Support Services, Student Recruitment and Admissions, Student Services, Registry.	Personal file, Student record database, exam board results lists, notice boards, enrolment records, personal record in student fees and finance files	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
6.	<b>Administration of student related policies and procedures</b> including appeals, complaints, grievances, disciplinary matters, and matters relating to health and conduct and to cheating and plagiarism (unfair means).  Name, ID Number, course, case details, correspondence.	Manual and electronic	Academic Support Services, Student Recruitment and Admissions, Student Services, Registry, Head of Institution.	Personal record in appeals file. Unfair means register.	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
7.	<b>Interview records/reports for further action/record</b> as requested/applicable. Personal details as in 1 above plus course details, NI number, advice and guidance needed and given, dates of appointments, interviews, meetings, action taken, reports, communications,	Manual and electronic	Academic Support Services, Registry, Finance.	Personal File, Personal Records in relevant file	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)

	employment records, external reports and records.					
8.	<p><b>Pursuit of social and sporting activities</b> e.g. relating to use of the Academy's sports facilities.</p> <p>Membership of clubs, societies and groups for processing, benefits and participation records. Personal details as in 1 above and attendance records, fees/charges, expenses claims.</p>	Manual and electronic	Student Services	Membership, Attendance	Academy and External	Article 6 (1)(b) or (1)(f)
9.	<p><b>Off-campus activities</b> for academic records, insurance, charges, attendance report.</p> <p>Visits, field trips, work experience, placements, residential and extra courses/sessions, expenses/claims, risk assessments, performance reports</p>	Manual and electronic	Registry; Finance	List of participants; records of performance; personal file; intent to travel form;	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
10.	<p><b>Provision of Academy accommodation and other support services</b></p> <p>Outstanding Debts Record/Library Fines for possible action. Name, ID No., course, attendance record, fees fines and charges invoiced and payments made, correspondence, notes of interview/s, record of decisions made, action taken, referral to external debt collection agency, court action.</p>	Manual and electronic	Student Services; Finance; Registry; Academic Support Services;	Applicants list; personal file; residents database; finance file; fire attendance lists; personal record in debts file; debt collection agency list	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)

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11.	<p><b>Processing and recovery of accounts and fees.</b></p> <p>Course Fees for invoicing. Fees for academic year, sponsor/SFE/student, Amounts paid, date invoiced.</p>	Manual and electronic	Registry, Finance	Enrolment form; invoices; credit and debit lists; student database record; student fees file	Academy and External	Article 6(1)(b) or (1)(e) or (1)(f)
12.	<p><b>Awards Ceremonies</b> for invitation of finalist students.</p> <p>Invitations, payments received, photography. And for successful students – tickets, gown hire, attendance, Name and Award gained in brochure, seat label, payments record</p>	Manual and electronic	Registry, Finance	Tickets, awards ceremony database, attendance lists	Academy and External	Article 6(1)(b) or (1)(f)
13.	<p><b>Research and statistical analysis.</b></p> <p>Surveys and questionnaires for monitoring and evaluation of provision, research and analysis.</p> <p>If not anonymous – Personal details as in 1 above, course details as in 3 above, opinions, comments, usage of service</p>	Manual and electronic	Registry, Academic Support Services, Student Services,	Personal record in relevant file	Academy	Article 6(1)(b) or (1)(e) or (1)(f)
14.	<p><b>Production of statistical returns required for third party government bodies</b> e.g. the Higher Education Statistics Agency, for completion of government supported survey, statistics e.g. the National Student Survey, the Destination of Leavers in Education Survey and the Teaching Excellence Framework.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations</p>	Manual and electronic	Student Services, Student Recruitment and Admissions, Academic Support Services, Registry	Personal record in relevant file, HESA return database, HESA destination of leavers from HE return, careers personal file.	Academy and External	Article 6 (1)(c) or (1)(e) or (1)(f)  Article 9(2)(j)



	<p>applicable to the Academy. Personal details as in 1 above, Course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p> <p>Career Destinations after leaving for processing. Name, qualification, address, employment/education/other after completing course, where known.</p>					
15.	<p><b>Direct mailing</b> of or about (i) student benefits and opportunities offered by or through the Academy, (ii) Academy activities and events organised for students, (iii) services or career opportunities of direct relevance to student interests and (iv) professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body.</p>	Electronic	Student Services, Academic Support Services, Registry	student database record, personal record in relevant file	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
16.	<p><b>Administration of employment contracts</b> where the student is employed by the Academy.</p>	Manual and electronic	HR, Student Services	Personal record in relevant file	Academy and External	Article 6 (1)(b) or (1)(c) or (1)(f)  Article 9(1)(b)
17.	<p><b>Administration of Alumni membership.</b></p> <p>Alumni Membership, as requested for future contacts. Name, ID No., award, course details, permanent address, donation and gift details, correspondence, employer contacts, professional and personal interest groups.</p>	Electronic	Student Recruitment and Admissions	Alumni database	Academy	Article 6 (1)(a) or (1)(f)

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18.	<p><b>Consideration and granting of prizes, scholarships and bursaries:</b> of discretionary funding available to students; and of other such awards.</p> <p>Name, address, ID No., Course details, status, information supplied on application, record of bursaries and scholarships allocated and decisions made, correspondence, payments made.</p>	Manual and electronic	Student Services; Registry; Academic Support Services; Finance	Personal record in student file	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
19.	<p><b>Health and safety of individuals and their property</b> and the protection of Academy assets, including the use of CCTV.</p> <p>Health &amp; Safety for first-aid assistance, emergency evacuation, hazard risk assessment, accident monitoring. Personal details as in 1 above. plus medical records, accident/hazard reports, consent records, first-aid action</p>	Manual and electronic	Human Resources; First Aiders; Academic Support Services; Student Services; Facilities	Personal record in relevant file; occurrences reports	Academy	Article 6 (1)(b) or (1)(c) or (1)(d) or (1)(f)
20.	<p><b>Operation of a lecture capture facility</b> relating to the recording of educational activities e.g. lectures held at and by the Academy.</p>	Electronic	Student Services; Recruitment and Admissions; Academic Support Services.	Video archive	Academy	Article 6 (1)(b) or (1)(e) or (1)(f)
21.	<p><b>Automated individual decision making with regard to assessment of fees status and suitability for further financial assistance</b> to be provided to students such as bursaries.</p> <p>Access to Learning Fund for processing application. Name, address, ID No., Course details, status, information supplied on application, record of funds allocated and decisions made, correspondence, payments made.</p>	Manual and electronic	Student Services; Finance; Registry	Personal record in student file	Academy and External	Article 22(2)(a)
22.	<p>To the Higher Education Statistics Agency, HEFCE, Office for Students government departments and other</p>	Manual and electronic	Registry; Tribal Student record system provider;	HESA return database; Student	Academy and External	Article 6(1)(b) or 6(1)(c) or (1)(e) or (1)(f)

	authorised users for the completion of student surveys and analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.			records database; personal file		Article 9(2)(j)
23.	<p><b>Local authorities for the purpose of enrolment on the electoral register</b> and exempting student from payment of council taxes.</p> <p><b>Council Tax eligibility.</b> Name, ID No. term-time address, date of birth, course title, course length, course start and expected end date, suspension and withdrawal from course for full time students for eligibility for Council Tax exemption.</p>	Manual and electronic	Student Services, Registry	Student records database; services student computer record	Academy and External	Article 6 (1)(b) or (1)(f)
24.	<p><b>Police or other regulatory body</b> where pursuant to the detection, investigation or disclosure of a potential crime.</p> <p><b>Information to 3<sup>rd</sup> Parties</b> for compliance with statutory and other Regulations applicable to the Academy. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Personal record in relevant file(s)	Academy and External	Article 6 1(c) or (1)(f)
25.	<b>Close family and emergency services</b> where there is an emergency situation e.g. illness, serious injury or bereavement.	Manual and electronic	Student Services; Academic Support Services; Registry	Personal record in relevant file(s)	Academy and External	Article 6 (1)(d) or (1)(f)

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26.	<p><b>External examiners for the purposes of assessment.</b></p> <p>Academic Marks, Results and Progress for assessments and Exam Board Results, Published Results lists. Annual progress, Exam Board outcomes, credits achieved.</p>	Manual and electronic	Academic Support Services; Registry	Personal file; student record database; exam board records	Academy and External	Article 6 (1)(b) or 6(1)(e) or (1)(f)
27.	<p><b>Governmental and regulatory bodies for the purpose of gathering census or other information</b> including the assessment of fees, including electoral registration officers.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations applicable to the Academy. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Personal record in relevant files	Academy and External	Article 6(1)(b) or (1)(c) or (1)(e) or (1)(f)
28.	<p><b>Home Office and other international and national governmental and regulatory bodies</b> in connection with the assessment of student status.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other regulations applicable to the Academy. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Personal record in relevant files	Academy and External	Article 6 (1)(b) or (1)(c) or (1)(e) or (1)(f)

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29.	<p><b>Third parties accessing information about student awards</b> - ranged by department and for the verification of awards to employers and other educational institutions.</p> <p><b>Sponsors</b> Attendance/Academic Marks, Results and Progress, if requested by employer or other third party sponsors, who are paying a student's fees</p>	Manual and electronic	Registry	Student records database	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
30.	<p><b>Other educational institutions involved in the delivery of a student's course or programme</b>, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA; and to other organisations in relation to work placements.</p> <p><b>External Registration</b> for Award. Name, date of birth, gender, postcode, funding status, qualifications on entry, Course, academic progress and achievement.</p>	Manual and electronic	Registry	Student records database; registration lists	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
31.	<p><b>Professional bodies</b> where registration with that body is related to or a requirement of the student's studies.</p>	Manual and electronic	Registry	Personal record in relevant file(s)	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)

	<p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations applicable to the Academy. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information supplied.</p>					
32.	<p><b>Banks (and other payment agencies</b> you may use), family, sponsors or other third parties to enable them to pay student debts.</p>	Manual and electronic	Student Services; Registry; Finance	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)

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33.	<b>External agents</b> of the Academy in relation to the repayment of student debts.	Manual and electronic	Finance; Registry	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(e) or (1)(f)
34.	<b>External agencies</b> - which may be based outside the European Economic Area - in connection with procedures for guarding against plagiarism. (Turnitin)	Electronic	Student Services; Registry	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(e) or (1)(f)
35.	<b>Data Processors</b> in order for them to process data on behalf of the Academy for any of the purposes for which the Academy is permitted to process the data, including the provision of academic and academic related services by the Academy.	Manual and electronic	Student Services; Finance; Registry; Recruitment and Admissions; Academic Support Services;	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
36.	<b>Provision of references</b> for students or former students.	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Student records database; personal record in relevant file(s)	Academy	Article 6 (1)(e) or (1)(f)
37.	<b>Sponsors</b> , including the Student Finance England and sponsors located overseas.	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
38.	<b>External bodies</b> and individuals who have funded student prizes and awards.	Manual and electronic	Student Services; Registry	Student records database; personal record in relevant file(s)	Academy and External	Article 6 (1)(b) or (1)(e) or (1)(f)
39.	<b>Official letters as requested by the student.</b> Name, ID Number, Course, Academic Year/s status. Additional information as requested by student. Request form.	Manual and electronic	Student Services; Registry	Personal record	Academy	Article 6 (1)(e) or (1)(f)

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40.	To the Academy's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Finance; Registry; Head of Institution	personal record in relevant file(s)	Academy and External	Article 6(1)(c) or (1)(e) or (1)(f)
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**All students agree to the Academy processing their “sensitive and special categories of personal data” for the following purposes and for release to the following third parties:**

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Academy and/or External Needs	Legal Basis for Processing <b>(Article 9)</b>
41.	To the Higher Education Statistics Agency, HEFCE, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable.	Manual and electronic	Registry; Tribal Student record system provider; Student Support Services;	HESA return database; Student records database; personal file	Academy and External	(see No. 15 and 23 above)  and Article 9(1)(g) or 9(2)(j)

42.	To other bodies involved in the delivery of the course or programme e.g. affiliated colleges, for the purpose of statistical analysis and programme administration.	Manual and electronic	Student Services; Academic Support Services; Registry	Student records database; registration lists	Academy and External	(see No. 32 above) and Article 9(1)(a) or (9)(1)(g)
43.	For the assessment and provision of services to disabled students.	Manual and electronic	Student Services; Student Recruitment and Admissions; Academic Support Services; Registry	Applicants list; personal file; residents database; finance file; fire attendance lists; personal record in debts file; debt collection agency list	Academy and External	(see No. 10 above) and Article 9(1)(a) or 9(1)(h)
44.	Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements.	Manual and electronic	Student Services; Academic Support Services; Registry	Student records database; personal record in relevant file(s)	Academy and External	(see No. 32 and 33 above) and Article 9(1)(a)
45.	To the Academy's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Finance; Registry; Head of Institution	personal record in relevant file(s)	Academy and External	(see No.42 above) and Article 9(1)(f)

**Article 6(1)(a)** Consent – on specific occasions the Academy 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 the Academy will process your data to enable it to meet its commitments to you e.g. those relating to teaching and assessment.

**Article 6 (1)(c)**, necessary to comply with a legal obligation – the Academy does 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 the Academy 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 – the Academy is an educational establishment and in particular its educational 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 the Academy or a third party subject to overridden interests of the data subject – the Academy (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. Where Article 6(1)(f) is used the “legitimate interest” is generally the interest of the Academy (or third party) in providing or supporting the provision of higher education to its students.

**Article 22(2)(a)** automated decision making necessary for performance of a contract – the Academy will sometimes automate decisions relating to its services it is providing to you.

**Article 9(1)(a)** processing “special categories” of data where you have given consent – the Academy will process certain sensitive information about you with your consent.

**Article 9(1)(b)** processing “special categories” of data where necessary for the purpose of carrying out obligations in the field of employment and social security and social protection law.

**Article 9(1)(f)** processing “special categories” of data in connection with legal claims.

**Article 9(1)(g)** processing “special categories” of data where necessary for reasons of substantial public interest.

**Article 9(1)(h)** processing “special categories” of data where necessary for the purposes of medical or health care.

**Article 9(2)(j)** processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes

It is recognised that some of the above grounds will overlap and that the Academy could rely on multiple grounds justifying its lawful processing. The Academy also reserves the right to rely upon other grounds that are not referred to under Table A.