

Privacy Notice Students



Who are we?

In this Privacy Notice, the terms "we", "our", and "us" refer to Stageworks Productions Ltd, trading as the International College of Musical Theatre (ICMT), 68 Wallis Road, London, E9 5LH, United Kingdom. ICO Registration number 08210001396.

As a controller of your personal data, we are responsible for looking after it, and we will use it fairly, lawfully, and in a transparent manner.

Purpose

We are committed to protecting your privacy. This notice will help you understand how we look after, use, store and share your personal data and how we meet our obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 (Data Protection Laws). It supplements any other notices or statements we may provide to you.

We have specific notices that explain how we process your personal data if you are an applicant, a student, a former student, an employee, an applicant for employment, or if you are attending a graduation ceremony. These notices are available on our website.

What personal data do we collect?

Personal data is any information from which you can be identified, e.g. name, date of birth, contact details, identification numbers, photographs, and expressions of opinion about you.

The personal data we collect and how we process it can vary depending on your interactions with us. Where applicable, we will collect the following:

- Identification and contact data (including name, identification number, date of birth, photograph, physical address, electronic contact details and telephone number).
- Equality of opportunity or treatment data (including racial origin, religious beliefs, health, gender and sexual orientation).
- Immigration data (including documents such as visas and passports).
- Criminal record data (including DBS checks and criminal conviction disclosure statements).
- Health and wellbeing data (including counselling records, welfare assessments, records of reasonable adjustments (for both studies and event attendance), emergency contact details, next of kin data, medical information, and welfare case records).
- Mobility data (including provider, itinerary, location, and activity data).
- Assessment and results data (including examination scripts, assessment marks, coursework, project work and other assessment forms).
- Awards data (including notification of results, award ceremony information, transcripts and diploma supplements).
- Participation data (including timetabling information, attendance and IT monitoring data, programmes of study, modules of study, deferrals and extensions, course changes and transfers, withdrawals, placement, field trips and mobility events).
- Complaints and dispute data (including academic appeals data, academic misconduct and general misconduct investigation information, and interactions with the Office of the Independent Adjudicator).
- Financial data (including service invoices, payment receipts, sponsorship records, grants, scholarships and emergency funds).
- Support data (including career advice, counselling, financial advice, and disability data).
- Survey data (including information provided by students in response to surveys).

- Testimonial data (including information provided by students as part of giving written, oral or other testimonials).

Special category data

We may process your special category data, such as:

- Racial or ethnic origin.
- Religion.
- Political views.
- Trade union membership.
- Genetics and biometrics (where used for ID purposes).
- Health and disabilities.
- Sex life and sexual orientation.

We will only process this data where you have given your explicit consent for us to do so, where you have manifestly made the personal data public, or when that processing is legally required except that.

- a) Information about your ethnicity and racial or ethnic origin, your religious or philosophical beliefs, health and disabilities and your sexual orientation may be processed in order to monitor compliance with the following:
 - The ICMT's legal obligations.
 - The requirements of the Higher Education Statistics Agency (HESA) and the Office for Students, and other equal opportunities legislation.
- b) Information about your physical or mental health and any disabilities that you may have may be shared with the relevant staff of the ICMT in order to provide you with the best possible support for your studies and assessments.

Criminal convictions

Personal data relating to criminal convictions and offences may have been collected from you in the following instances:

- If we are being made aware of it by a third party, such as the police or other crime and fraud prevention and detection agencies,
- If we are notified of such information directly by you during your studies with us.

We will only process data relating to criminal convictions or alleged criminal behaviour when permitted to do so by the Data Protection Laws and only in accordance with our Disclosure of Criminal Convictions Policy. The processing of criminal conviction data occurs:

- When the ICMT must comply with the law.
- Where there is a substantial public interest in us doing so (including to ensure that we can provide a safe and secure learning environment in accordance with our safeguarding responsibilities and public interest functions).
- In legal claims, where it is necessary to protect your or someone else's interests, and you cannot give your consent, or where you have already made the information public.

Where do we get your personal data from?

We collect your personal data directly from you; during your visits to our website; if you attend our events or through any other communication you have with us.

Except for your IP address data, when visiting our website, we will only collect personal data when it is voluntarily submitted.

Information that you give us	<p>You may share personal data about yourself and your circumstances by:</p> <ul style="list-style-type: none">• Providing information as part of your application process.• Completing forms during the registration process.
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	<ul style="list-style-type: none"> • Completing online or manual enrolment forms. • Filling in feedback forms and other course documentation • Filling in forms on our website, registering and continuing to use our website. • Giving us information about yourself in any communications with us either by telephone, email, post or otherwise. <p>We need you to provide the personal data in the situations listed above so we can support you or give you the information that you need and so that we can comply with our contractual obligations to you, our legal obligations and our public interest tasks.</p> <p>If you do not provide this data, it may mean that we will be unable to offer you a place on one of our courses, continue with your education at the ICMT, or provide you with the level of support and assistance that we usually provide</p>
Information that we collect about you	<ul style="list-style-type: none"> • Details of your visits to our website including, but are not limited to, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time zone setting, browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. • Data including your name and images captured on CCTV when you visit one of our campuses. • As part of the events organised at our campuses and their associated buildings, as necessary for our legitimate interests, third-party photographers may be on site. If you do not wish to be included in any photographs or live-streamed events,

	please ensure that you clearly express your wishes to a staff member.
Information that we receive from other sources	<p>We may receive personal data about you from other third parties, including:</p> <ul style="list-style-type: none"> • Third-party recruiters engaged on our behalf. • The Police and Criminal Records Agency. • Sponsors and bodies and agencies who are funding your higher education. • Other members of the ICMT. • External health and social care professionals, including doctors, consultants, nurses, psychiatrists, social workers and paramedics, if there is serious concern about your welfare, where such information is reasonably necessary to help safeguard your wellbeing. • Other staff or students of the ICMT as part of our Case Reporting System. • Your parents, guardians or any other third parties who send us personal data on your behalf.

Please note that we may combine all personal data that we collect about you, i.e. data we receive from other sources, data you give to us and data we collect.

Why do we need personal data, and how do we use it?

- To facilitate and monitor your academic development and engagement with learning opportunities as necessary in connection with our public interest functions, the performance of our agreement with you and/or our legitimate interests.
- To enable us to meet our legal obligations.

- Where there are concerns about the health, safety and wellbeing of you or others, meeting our contractual and legal obligations to you and protecting your or their vital interests.
- To produce learning analytics which involves the measurement, collection, analysis and reporting of data about learners to track student progression and retention and to understand and optimise learning and the environments where it occurs, as may be necessary for connection with our public interest functions and/or for our legitimate interests, as well as where you have given explicit consent for us to do so (special category data).
- For relevant professional conduct purposes in accordance with our legal obligations and as may be necessary for connection with our public interest functions and/or for our legitimate interests.
- To report to third parties in relation to your attendance or progress at the ICMT where we are legally obliged to do so, where this is necessary for the performance of our contract with you or where it is necessary for our public interest functions and/or for our legitimate interests.
- To carry out disciplinary and grievance processes to meet our contractual and legal obligations.
- To promote the ICMT by using photographic images on our website, in our prospectus and in other promotional materials, as may be necessary for connection with our public interest functions and/or for our legitimate interests or where we have gained your consent to use your image for specified purposes.
- To understand your position in terms of career planning and readiness for the employment market and to offer you targeted career support, help shape your career development and increase graduate employment outcomes and graduate satisfaction in line with our public interest functions and our legitimate interests.
- As part of our efforts to keep our campuses and other sites safe and secure, enabling us to operate CCTV, body cams and audio and visual recordings of classes.

- To issue ID cards to allow access to buildings and departments and to ensure the safety and wellbeing of students, employees, workers, consultants and buildings and for general correspondence.
- To ensure our student's and staff's health and safety and to prevent and detect crime, Signs are in place to indicate where cameras are in use. In addition to being used for the prevention and detection of crime and as part of our efforts to keep our sites safe and secure, CCTV footage may also be used during disciplinary proceedings.
- To monitor compliance with IT and electronic communications policies, for example, regarding internet use, computer resources, email, telephone, and other policies and regulations.
- If you submit a Data Subject Access Request or a Freedom of Information Request, we will keep a record of that correspondence to deal with and/or respond to your request. We need information from you to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. When we receive a request from you, we will set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We will also store, on this case file, a copy of the information that falls within the scope of your request in order to maintain adequate records of the information we have released to you.
- Similarly, if you report a data breach, we will set up an electronic case file containing the details of the breach, and we will keep a record of our correspondence with you. We need information from you to contain and mitigate the risk. This enables us to comply with our legal obligations under the legislation we are subject to.
- To enable us to contact others in an emergency (we will do this based on the presumption that you have checked with the individuals before you supply their contact details to us).
- To support the provision of educational services integral to teaching, assessment and award activities. This includes processing applications for study and enrolment as a student, administration of induction events and transfers between courses, and other contact (such as inviting students to a focus group or organising field trips).

- To provide education references once you have left the ICMT and to enable communications between you and the ICMT.
- To confirm students' statuses for council tax assessments or electoral purposes, as well as for NUS registration.
- To ensure equality of opportunity for all students in terms of access and participation, and also equity of treatment in awards and outcomes.
- To enable us to provide immigration and welfare support services.
- To facilitate individuals' protection and wellbeing and enforce the general regulations concerning criminal activities and participation.
- To safeguard students by providing safe and secure environments and meeting health and wellbeing requirements and the duty of care requirements in line with Health and Safety legislation throughout their studies.
- To manage and monitor off-campus activities, including work-based placements, study in other institutions (including international exchange programmes), and field trips.
- To determine the results of assessment activity and to measure and record students' academic progress.
- To provide graduates with a narrative describing their academic and other achievements and proof of the outcome of their studies.
- To provide information to bodies, including HESA, where we have a statutory duty.
- To support the resolution of disputes consistently and fairly, and in line with contractual terms and conditions.
- To maintain an accurate account of financial transactions between students and us.
- To support students during their enrolment with us in a holistic manner.
- To improve the facilities provided by us and the student's overall experience.

- To communicate effectively with you by post, email, phone and including via the distribution of relevant newsletters to form our contact with you and for our legitimate interest.
- To support the marketing and promotion of the ICMT.

Legal claims

Personal data, including special category data, may be processed for establishing, exercising or defending a legal claim.

Basis for using your personal data

We need a legal basis for any processing of personal data. This means that our processing must be for one of a limited number of reasons set out in the data protection laws. The legal bases that we rely on are:

Processing is necessary to enter into or perform a contract

When you become a student with us and, in certain circumstances, when you accept our offer of a place, we enter into a contract with you. For us to fulfil our obligations under this contract (e.g. to facilitate and monitor your academic development), we will need to collect, process and share (as further detailed below) your personal data.

Compliance with a legal obligation

Sometimes we process your personal data because we are legally obliged to do so; for example in some of the circumstances listed above, to demonstrate compliance with Home Office regulations, or because we may be required to share your personal data with specific statutory bodies.

The processing is necessary for the performance of a task carried out in the public interest

We may need to process your personal data to carry out our public interest tasks, such as providing higher education. For example:

- Ensuring the provision and quality of the education and related services we provide.
- Ensuring the smooth and efficient operation of the ICMT.
- Ensuring student engagement and a safe and supportive learning environment.
- Ensuring safeguarding and welfare measures are in place for students.
- Ensuring the campus is safe and secure and allowing students and staff to attend and deliver classes.
- Encouraging equality.
- Protecting our reputation and goodwill.

Legitimate interests

We may use your personal data (excluding special category data) as set out in this Privacy Notice for the legitimate interests of the ICMT, including:

- Improving the quality and functionality of our website.
- Keeping adequate records.
- Enabling us to engage with you so that we can provide you with services.

We will always balance our legitimate interests in processing your personal data against your privacy rights.

Legitimate interest	<p>We have a legitimate interest in processing your personal data as:</p> <ul style="list-style-type: none"> • You benefit from the provision of the services we provide. • We need to ensure health and safety at our sites. We have a legitimate interest in ensuring that any related policies and processes are effective. • We need to promote and advertise the ICMT to attract students to it in the future.
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	<ul style="list-style-type: none"> • We have a legitimate interest in ensuring our sites' security and assisting with crime prevention and detection. • We need to ensure engagement and a safe and supportive learning environment.
Necessity	<ul style="list-style-type: none"> • The processing is necessary for the purposes outlined in this Privacy Notice.
Impact of processing	<ul style="list-style-type: none"> • Such processing does not unreasonably intrude on your privacy.

Vital interests

We consider it reasonable to process personal data for the protection of any interests that are essential for someone's life.

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than sending third-party direct digital marketing communications to you. You can withdraw consent to marketing at any time by contacting us.

Where we wish to use your image in promotional videos and photographs, we will first obtain your consent.

If we require your consent to process your personal data in any other circumstances, we will contact you separately to request this.

Processing of your personal data

Processing means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will process your personal data for the purposes set out above or as we otherwise notify you.

The personal data you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for automated decision-making.

How long do we keep your personal data?

We will only keep your personal data for as long as we need to fulfil the purposes for collecting it, including satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your data: the amount, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the purposes for processing it, and whether we can achieve those purposes through other means; and the applicable legal requirements.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you), and we may use this data indefinitely without further notice.

Who do we share your personal data with?

Your personal data may be disclosed to other departments within the ICMT so that they can carry out their day-to-day activities (in relation to the provision of education and ancillary services), as well as to third parties (including information about your post-university work or study situation), including to:

- The police and other crime and fraud prevention and detection agencies for crime prevention or detection purposes.
- The Home Office, including UK Visas and Immigration, UK embassies, local authorities and other government bodies, to comply with our obligations to the Visa and Immigration Service and any successor to it.
- Tutors, trainers, coaches, external tutors and other education professionals to support your academic development and engagement with learning opportunities.
- Government bodies and agencies, where we are legally obliged to do so, according to a valid request, such as (by way of examples only) the Higher Education Statistics Agency, the Office for Students (OfS), the Higher Education Funding Council for England and the Quality Assurance Agency for Higher Education.

- The Disclosure and Barring Service where such information is required in order to comply with a legal obligation.
- Sponsors, agencies or bodies funding or intending to fund your programme of study in accordance with our contractual or legal obligations or where it is necessary for our public interest functions and/or our legitimate interests to do so, including to report your academic progress to them if your education is sponsored by one of them.
- Your country's government, high commission, embassy or consulate where we are legally required to do so or where our public interest functions and/or our legitimate interests must do so, including reporting your academic progress to them if your government sponsors your education.
- External health and social care professionals, including doctors, consultants, nurses, psychiatrists, social workers and paramedics, if there is serious concern about your welfare and where such information is reasonably necessary to help safeguard your wellbeing.
- Third parties we have engaged in providing processing activities on our behalf, where such processing is to be conducted under a formal agreement which includes provisions around the processing of personal data and that provides appropriate safeguards for your personal data. We may engage third parties to provide processing activities where it is necessary for our public interest functions and/or our legitimate interests. This includes processing for administrative and practical purposes such as delivering online course content to you. Some of our suppliers may use aggregated (e.g., statistical or demographic data derived from personal data but not considered as such in law as it does not reveal your identity) and anonymised data for their own purposes, including for benchmarking and service improvement.
- Third parties who initially provided us with personal data relating to you, such as third-party recruitment agents where it is necessary for our public interest functions and/or our legitimate interests or pursuant to our contractual obligations to you.
- Partner institutions such as Coventry University for the purposes of sharing marks and other details where this forms part of our contractual agreement with you or where it is necessary for our public interest functions and/or our legitimate interests to do so.
- Statutory bodies, including the Office for Students (OfS), Higher Education Statistics Agency (HESA), including in relation to statutory surveys such as National Student Surveys or graduate

outcomes surveys (in relation to which information is collected from graduates and provided to HESA up to 14 months following the completion of undergraduate studies) and local councils and electoral authorities.

- If you are participating in an event, we may share some of your personal data with external organisations providing services for the event you are attending. In particular, we may share your information (including dietary requirements) with the catering service if you attend an event where catering is offered. The personal data shared will only be used to provide the service required and will not be retained by these external organisations after the event is concluded.
- Family and next of kin, in case of an emergency.
- External examiners, moderators and plagiarism-checking agencies.
- Third-party marketing, event and travel organisation companies to invite students to events and organise course-related trips.
- The Office of the Independent Adjudicator.
- Marketing or third-party Media Agencies.
- Professional advisors and insurers.
- Health and Safety Executives, where a complaint has been made under RIDDOR.

We may engage third parties to provide processing activities where it is necessary for our public interest functions and/or our legitimate interests to do so (including processing for administrative and practical purposes such as field trips). We require that all third parties who process personal data on our behalf treat it according to the Data Protection Laws. We do not allow our third-party service providers to use your personal data for their purposes but only to process it for specified purposes and in accordance with our instructions. Such processing is to be conducted under a formal agreement, which includes provisions around the processing of personal data and provides appropriate safeguards.

Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against its unlawful or unauthorised processing and against its accidental loss or damage.

Your data protection rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to correct any incomplete or inaccurate data that we hold about you. However, we may need to verify the accuracy of the new personal data.

Request the erasure of your personal data. This enables you to ask us to delete or remove personal data if:

- There is no good reason for us to continue processing it.
- You have successfully exercised your right to object to processing (see below).
- You believe we may have processed your personal data unlawfully.
- We are required to erase your personal data to comply with the law.

Please note that we may not be able to comply with your request for specific legal reasons, which, if applicable, will be notified to you.

Object to processing of your personal data when we are relying on a public task or a legitimate interest (or those of a third party), and you feel that this processing impacts your fundamental rights and freedoms. However, these may be overridden by the public interest or our legitimate interest grounds.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the accuracy of the data.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it (for example, if you need it to establish, exercise or defend legal claims).
- If you have objected to our use of your data, but we need to verify whether we have overriding public interest or legitimate interest grounds to use it.

Request the transfer of your personal data to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated data you initially provided consent for us to use or where we used the data to contract with you.

Withdraw consent at any time when we are relying on consent to process your personal data. This will not affect the lawfulness of any processing before you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. When you opt out of receiving these marketing messages, you will no longer hear from us in that regard.

Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the International College of Musical Theatre, 68 Wallis Road, London, E9 5LH, or email info@theicmt.com.

You will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to confirm your identity. This is a security measure to ensure that personal data is not disclosed to anyone with no right to receive it. We may also contact you to ask you for further information to speed up our response.

We try to respond to all legitimate requests within one month. However, it may take longer if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Complaints and questions

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any concerns or complaints about it, please contact the Data Protection Officer at the International College of Musical Theatre, 68 Wallis Road, London, E9 5LH, or email info@theicmt.com.

If you are not satisfied with the proposed resolution of your complaint, you have the right to contact the Information Commissioner's Office. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time. Any updated versions will be made available on our website.