

Guildhall School of Music & Drama Higher Education Privacy Notice

This policy is of relevance to all Higher Education enquirers (including those involved in Widening Participation activities) and Higher Education applicants, students, graduands, extra-mural Principal Study students and Fellows.

Version Number	PNHE18.1
Approved on	17 May 2018
Approved by	Operations Board (by circulation)
Written by	Assistant Registrar – Student Database Support & Secretary & Dean of Students
Last reviewed	September 2023
Last amendment	Editorial change from ‘next of kin’ to ‘emergency contact’
Date of last amendment	September 2023

Specific Privacy notice

The Guildhall School is a department of the City of London Corporation (“the City of London”) and the City of London is the data controller. This specific privacy notice covers activities relating to the provision of Higher Education programmes and widening participation activities supporting recruitment to higher education and is a part of the School’s overarching privacy notice found at [GSMD website](#).

The Guildhall School is committed to protecting your privacy; this privacy notice explains how we use information about you and how we protect your privacy. If you have any concerns or questions about how the School looks after your personal information please contact the City of London’s Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at information.officer@cityoflondon.gov.uk or alternatively contact the School [via Katharine Lewis, Secretary & Dean of Students registry@gsmd.ac.uk].

The scope of this document covers all Higher Education activities, including enquirers, applicants, students, graduands up to the point of graduation and for the

purposes of the core student record. It also covers other external users involved in the process such as external examiners.

What personal data is collected about you

We may collect your data in a variety of ways, for example:

- When you communicate with us by telephone, email or via our websites
- When you use forms to provide data e.g. on application or enrolment
- When you supply additional documentation e.g. qualification certificates or evidence of identity
- As part of processes related to an enquiry, application for any course/programme administration purpose
- As part of a process for the good management of the School community, eg case consultation, appeal, complaint, disciplinary process
- From third parties for example from referees, funding bodies, Transport for London

We may collect personal data such as the following:

- Biographical information including your name, gender and date of birth
- Contact details and communication preferences such as your address, email and phone number
- NI number, passport number and identity details, domicile and nationality, demographic information.
- Photo for audition identification and for ID card
- Video recordings (including CCTV)
- Production and rehearsal photography*
- Education and employment history including references
- Family or personal circumstances and extracurricular interests e.g. for assessment of suitability for funding or support.
- Family and parent/guardian details where relevant to our needs
- Financial information where appropriate e.g. for applying for funding support
- Your enquirer and applicant history and student record
- Course and stage details
- Attendance, progress and status
- Assessment results

* Specific consent will be required for under-18 participants and students

We may also collect special category data (previously 'sensitive')

- For support and statutory/monitoring reporting: disability, health and medical conditions,
- For admission and safeguarding purposes: criminal convictions,

- For statutory monitoring and reporting purposes: racial or ethnic origin, religion or similar beliefs, sexual orientation

Personal information relating to criminal offences and convictions is also collected and although not 'special category data', is still sensitive in nature and merits higher protection. This would be collected for admission and safeguarding purposes.

Additional personal data may be collected where relevant in relation to placements, extenuating circumstances, professional body requirements, appeals/complaints/disciplinary cases and any further optional student services.

Reasons why we use your personal data

Specific list of uses by category

- a. Recruitment and admissions
- b. Enrolment of students
- c. Academic matters
 - i. Assessment and progression
 - ii. Core teaching and learning and academic conduct
 - iii. Awards and graduation
 - iv. Maintaining student records
 - v. Assessing eligibility for funding
 - vi. Liaison with an external validator or other partner in the delivery of a programme of study (eg City University for the doctoral programme, EU institutions under the Erasmus+ mobility scheme, CAD for the BA in Acting Studies)
- d. Library, IT and information services including email addresses
- e. ID cards including photo.
- f. AV Recordings
- g. Support services including disability support, counselling, health & welfare advice
- h. Institution social activities e.g. clubs and societies and using school facilities
- i. Events and activities organised for students or directly relevant to student interests
- j. Employment purposes and work placements where students are employed by the institution e.g. the External Engagements scheme and students with Tier 4 visas.
- k. Monitoring equal opportunities
- l. Monitoring and evaluating widening participation activity and participants to gauge long term success
- m. Safeguarding
- n. Accommodation
- o. Social media

- p. Fees, funding and debt recovery
- q. Immigration management and compliance
- r. Other admin
 - i. Statistical analysis and research
 - ii. Returns and surveys for government bodies
 - iii. Audits
 - iv. Operational information e.g. IT support, building closures, safety
 - v. Promoting services
 - vi. Safety of individuals and assets including use of CCTV
 - vii. Preventing crime
 - viii. Complaints, appeals and disciplinarys
 - ix. Enquiries
- s. When necessary to protect your or another person's vital interests

Why we are allowed to use your personal data

The processing of your personal information for the above purposes is necessary:

- To interact before enrolment as part of enquiries and admissions process
- To meet our contractual obligations (e.g. to manage your student experience and welfare while studying at the School)
- To comply with a legal obligation (e.g. equal opportunities monitoring)
- To perform tasks we carry out in the public interest (e.g. teaching and research)
- For legitimate interests (e.g. to enable your access to external services)
- To protect the vital interests of you or another person

For any specific use of your personal information outside these reasons we will ask for your consent and inform you how you can withdraw consent at any time.

If you have given your explicit consent we may share marketing materials including information about upcoming events, courses, performances and other activities, our news, and other ways you can get involved with the School. Where you have provided your postal address, we may send this information to you by post unless you have told us not to. We may also email you this information if you have agreed for us to do so.

Who we can share your personal data with

Your data will be used by staff and contractors within the Guildhall School for the purposes specified.

Once you graduate from the Guildhall School (HE degree students only) you will become a lifelong member of our alumni community. Using the details you have provided our alumni team will continue to contact you via post and with appropriate opportunities by phone. They will also ask your permission to contact you via email.

The Guildhall School is a department of the City of London Corporation and shares the same data controller. Where services are provided by central City of London departments or shared with other departments within the City of London, your data may also be shared with those departments.

For example this may include:

Barbican Box Office for the provision of prospectuses: If you have requested a prospectus, your data will be passed securely to the Barbican Box Office who will process your request and send you a prospectus. The City of London is the data controller for the Barbican and the Guildhall School; you can find the City of London privacy policy here [link to City data statement]. Your data will be used by the Barbican Box Office solely to fulfil your request and will be deleted from Barbican records afterwards within 2 weeks. This data processing is carried out to fulfil the contract of a prospectus request.

HR if you are employed by the School: If you are employed by the School, part of the External Engagements scheme, or are a Tier 4 student undertaking work placements through the External Engagements scheme then we will share your biographical information, identity data, contact details and employment information where appropriate for the purpose of administering your employment or work placement.

City of London Finance and Procurement Services: your financial account with the School is held by the City of London. Any records of bank details that are sent between the School and the City of London will be transferred securely.

Internal auditors: For the purpose of auditing the services provided by the School, personal data may be processed by internal auditors, however any data that may need to be removed from the School will be anonymised first.

Other shared departments include Facilities and Performance Venues.

Your data may additionally be shared with:

- City University (Doctoral students and extra-mural)
- Funders and/or sponsors e.g.
 - Student Finance England/Wales/NI, SAAS, Student Finance Services EU Team
 - Research Councils
 - Funders of any awards or prizes
- PayPal – We use Paypal to take secure online payments. The data sent between the School and Paypal includes identification information, payment requirements and details of whether the transaction was successful. No financial information (debit/credit card details or bank details from your Paypal account) is shared with the Guildhall School. Contact: Finance@gsmd.ac.uk 020 7382 7208. All payments are normally non-refundable. Please see relevant policies for full details of payment conditions.

- External placement providers and External Engagement clients (which may include clients from outside the EU)
- External examiners and individuals involved in relevant School committees and procedures
- Current and potential education providers (e.g. exchange institutions hosting our students or sending us visiting students)
- Partners in programme delivery where relevant, eg LSO, Royal Opera House
- Any relevant professional or statutory regulatory bodies where the course leads to registration e.g. Health Care Profession Council for MA Music Therapy students
- External auditors
- Confirm and verify details of results and degrees awarded
- References to third parties which may be overseas (must always have explicit consent)
- Our bank to process payments
- Cloud Hosted systems e.g. Asimut (room booking), Symphony (library system)
- Tribal – technical support requiring access to database
- Eduserv - for the provision of on-line library resources
- Cosector for the provision of a short message service (SMS) for contacting students
- Relevant Government Departments
 - Home office
- Relevant executive agencies or non-departmental public bodies
 - UK Visas and Immigration
- Relevant HE bodies
 - OfS
 - Office of the Independent Adjudicator
 - UK Research and Innovation and Research Councils
 - NSS (unless request otherwise)
 - Organisations running student and leaver surveys (unless request otherwise)
- Independent Safeguarding Authority
- Research Councils
- Local authority Council Tax Offices
- Transport for London Student Scheme for confirmation of attendance
- Parents, guardians and emergency contacts, where there is a legitimate reason for disclosure
- Police and law enforcement agencies
- Emergency services

External systems administrators for which we have a contract e.g.

- Asimut (externally hosted timetabling system)
- Tribal (managed service contract for SITS student records system)
- Symphony (externally hosted library catalogue system)
- Eduserve (for the provision of on-line resources)
- Cosector (for the provision of SMS)
- Raisers' Edge

Situations when your personal data might be sent to other countries include:

- When the School uses third-party software such as SurveyMonkey to contact you
- The Central Academy of Drama in Beijing for BA Acting Studies students
- US loans providers if you apply for their funding
- Institutions with whom we have an exchange agreement (where relevant to and individual student)
- Youtube (private, password protected channel for audition purposes)

We may seek additional consent for:

- Electoral registration
- Nominating you to a third party for external awards
- Use of photography and other image recording for under-18s.

How long we keep your personal data for

Personal data will be processed in accordance with the School's Higher Education record retention policy published at gsmd.ac.uk/privacy

Some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes.

Appendix 1

Categories of person (not exhaustive) – each may have specific categories or examples

1. Student (inc graduate) on awarding course and junior including x, y, z ... (all student, app, online, enquirer records)
2. Student on non-awarding course (short course, summer school etc) and not included in 1)
3. Non-enrolled applicant for awarding course and not included in 1) or 2) (all app, online and enquirer records)
4. Non-enrolled applicant for non-awarding course and not included in 1, 2, 3,
5. Online applicant not in above (all online and enquirer)
6. Enquirer not in above (all enquirer)
7. User accounts (not in above – incomplete application may have been deleted)
8. Emergency Contact (linked to applicants and students)
9. Referees (may be personal contact details)