

Understanding this document:

This schedule outlines how the Conservatoire holds and processes data, including category/types of data, the specific purposes of processing, where we will share data with third parties, and the lawful bases for processing data along with retention periods, in accordance with Article 6 of GDPR.

Information about the types of personal data (including where relevant special category data) to which this schedule applies are set out in sections 3, 4 and 5 of the Conservatoire Data Processing Statement. Please refer to the statement for further details.

Types of personal data

- a) Electronic and hard copy documentary student records (including registration records and application forms; documents generated by academic/casework activities etc.)
- b) Statistical data
- c) Audio, visual and audio-visual recordings (e.g. of classes, seminars, lectures, performances, assessments, and other learning activities)
- d) Photographic images; showreels
- e) Work produced by students in the course of their studies, including practical, audio-visual, recorded and/or written work.

Section	Activity	Category/type	No	Specific Purposes	Types of personal data normally processed for these purposes	Lawful Basis	Who your data will be shared with	Relevant policies	Retention period	Rationale for retention period
A)	Higher education	Academic Activity	1	Sharing of data with other institutions the Conservatoire jointly conducts research work with or contracts to conduct research work on behalf of the Conservatoire	a, b, c, d, e	Legitimate interest: necessary for scientific research or statistical purposes	School, Conservatoire, other institutions or organisations (e.g. Office for Students)	Research stratgy, Data Processing Statement	Completion of analysis + 10 years	JISC recommendation
A)	HE-related	Academic Activity	2	Sharing of data with any third party wishing to access a catalogue within schools' libraries containing references to student work	a, c, d, e	Legitimate purpose of providing open access to research and academic works where students have consented to publication of this work or are required to publish under the terms of any funding or sponsorship agreement	Schools, Conservatoire, third parties	School Data Processing Statement	Permanent	Enduring value
B)	HE-related	Academic administration	1	Sharing of data with third parties who provide IT services, data processing or functionality (e.g. Microsoft, Google, Dropbox, etc.). Like many higher education providers, we use third party providers to support our operation and provision of higher education to staff and students, such as cloud-based software providers, web hosting/management providers, data analysis providers, and data back-up and security/storage providers.	a, b, c, d, e	Legitimate purpose of providing students with modern IT solutions and services to support their studies.	Schools, Conservatoire, third party IT service providers	School IT Policies, Conservatoire IT Policy, Data Processing Statement, School Data Processing Statement	For retention periods, please see specific types of data (e.g. student core registration)	For the rationale of relevant retention periods, please see specific types of data (e.g. student core registration)
B)	Higher education	Academic administration	2	Sharing of data with other UK based and international educational institutions and other organisations which the Conservatoire and its member schools partner or collaborate with to deliver placements, joint or dual awards or franchised or validated awards	a, b, c, d, e	Processing necessary for the performance of our contract with students or legitimate purpose of providing students to exchange opportunities	Conservatoire, Schools, other partner/collaborative provision organisations	School Data Processing Statement, Conservatoire Data Processing Statement, School placement policies, memoranda of agreement	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
B)	Higher education	Academic administration	3	Sharing of data with external examiners for the purpose of assessment	a, c, d, e	Necessary for the performance of a task in the public interest, namely the provision of higher education	Conservatoire, Schools, validating universities	Academic regulations, Data Processing Statement	Current academic year + 3 years	JISC recommendation (Records documenting the administration of academic programmes, row 44)
B)	Higher education	Academic administration	4	Sharing of data with external agencies/services such as TurnItIn and other academic institutions in order to investigate possible instances academic misconduct (e.g. plagiarism, collusion, contract cheating)	a, e	Necessary for performance of a task in the public interest, namely provision of higher education services (necessary to maintain academic quality standards and integrity)	Schools, Conservatoire, external agencies	Academic regulations, Data Processing Statement	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
C)	Higher education	Admissions	1	For BOVTS Students only: Submission of data to UCAS to administer the applications and clearing process	a, b	Necessary for the performance of a task in the public interest, namely the provision of higher education	UCAS, Conservatoire, School	Admissions policy and Data Processing Statement	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
D)	HE-related	Alumni	1	Sharing of data with professional and industrial bodies (such as Equity) wishing to communicate with students about career opportunities and membership of their body and also where relevant to confirm your qualifications and accredit your course	a, d, e	Consent of students	Schools, Conservatoire, Third parties	Data Processing Statement	Permanent subject to consent	Enduring value
E)	HE-related	Legal compliance	1	Submission of data to the Home Office and other international and national governmental and regulatory bodies in connection with the assessment of students' immigration status	a, b, d	Necessary for compliance with legal obligations or for the performance of public tasks in the immigration context	Conservatoire, Schools, allied public/government services	Data Processing Statement, Operating and Finance Agreement	Notification of closure of case + 6 years	Limitations Act 1980 chapter 58 section 5
E)	HE-related	Legal compliance	2	Disclosure of your details to third party auditors	a, b	Necessary for compliance with legal obligations, namely the Companies Act 2006 and Charities Act 2011	Conservatoire, Schools, external audit agencies or organisations	Data Processing Statement	Completion of audit + 5 years	JISC recommendation
E)	HE-related	Legal compliance	3	Sharing Conservatoire application data as required by the OFS (specifically gender, postcode, ethnicity)	a, b	Necessary for the compliance of a legal obligation to which the controller is subject, namely compliance with OFS condition F1	Schools, Conservatoire, OFS	Data Processing Statement	Academic year of application + 6 years	Limitations Act 1980 chapter 58 section 5
E)	HE-related	Legal compliance	4	Conservatoire publishing anonymised and aggregated application statistics	b	Necessary for the compliance of a legal obligation to which the controller is subject, namely compliance with OFS condition F1	Schools, Conservatoire, OFS	Data Processing Statement	Academic year of application + 6 years	Limitations Act 1980 chapter 58 section 5

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F)	HE-related	Marketing & corporate	1	Sharing of data with direct mail, marketing, and events agencies who may assist the Conservatoire in the administration of mailing to enquirers, applicants, offer holders, students and our alumni and the booking of events, e.g. agencies such as EventBrite.	a, c, d, e	Processing is necessary for the legitimate purpose of communicating with students and offer holders about benefits, services, activities and events or consent to communicate such information to enquirers and applicants	Conservatoire, Schools, Third parties	Data Processing Statement	not applicable	not applicable
F)	HE-related	Marketing & corporate	2	Sharing of data such as photographs/images and/or film captured as part of a performance, event or commissioned studio session. These images or film are stored securely both at the member school and the Conservatoire, and may be used for promotion through external media.	a, c, d, e	Legitimate interest: for the purpose of promoting the Conservatoire and/or member schools	Conservatoire, Schools, external agencies or organisations	Data Processing Statement	Permanent subject to enduring value	Enduring value
G)	HE-related	Registration	1	Sharing of data with local authorities for council tax assessment purposes or electoral purposes and for processing of care leaver bursaries	a	Necessary for performance of task in the public interest, namely local authorities' functions of assessing council tax payments, supporting local authority care leavers and managing electoral services; processing is necessary for compliance with a legal obligation to which the controller is subject namely compliance with OfS condition E5.	Schools, Conservatoire, local authorities, students	Student terms and conditions, Student handbooks	N/A	N/A
G)	HE-related	Registration/Fees & Finance	2	Disclosures to grant funding bodies to evidence allocation of grant funding payments, including payments of salaries and contact details of students undertaking grant funded work (examples of grant funding organisations will include Erasmus, the European Commission and International Embassies)	a, e	Legitimate interest: for the purpose of administrating grant funds in accordance with funder requirements	Schools, Conservatoire, Third parties	Data Processing Statement, School Data Processing Statement	End of student relationship + 6 years (end of student relationship will be determined in these circumstances by the Conservatoire)	Limitations Act 1980 chapter 58 section 5
G)	HE-related	Registration/Fees & Finance	3	Disclosure to Student Loans Company and Student Finance to administer student fees and confirm enrolment on course and payment. Disclosures may also include any change of circumstances in relation to students' personal information and/or programme of study, as well as any bursary award(s) from a member school and/or the Conservatoire	a	Necessary for performance of a task in the public interest, namely the proper administration of student funding support	Schools, Conservatoire, SLC, Other funding bodies	Student terms and conditions, Fees policies, Operating and Finance Agreement	N/A	N/A
G)	HE-related	Registration/Fees & Finance	4	Sharing of data with external agents in relation to the repayment of student debts, where internal recovery attempts have proved unsuccessful	a, d	Legitimate purpose of recovering student debts	Conservatoire, schools, external agents	Student terms and conditions, Fees policies	End of student relationship + 6 years (end of student relationship will be determined in these circumstances by the Conservatoire)	Limitations Act 1980 chapter 58 section 5
G)	HE-related	Registration/Fees & Finance	5	Sharing data with organisations providing banking and online payment processing services e.g. for the purposes of refunds and compensation	a	Necessary for the performance of a contract; Legitimate interest: for the purpose of engaging third parties to process and manage institutional financial transactions	Conservatoire, schools, third party banking or payment organisations	Data Processing Statement, Student protection plan, refunds and compensation policy, school fees policies	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
H)	HE-related	Security	1	Submission of data to the Conservatoire's insurers in respect of accidents or incidents occurring with the institution and external auditors and external regulators such as the Health and Safety Executive	a, b, d	Legitimate interest: purpose of managing our insurance claims or reporting such incidents to regulators and auditors. Processing is necessary for compliance with a legal obligation to which the Conservatoire is subject. Disclosures of sensitive personal data in this context will be made where explicit consent has been obtained, disclosure is in the substantial public interest or where necessary for establishment, exercise or defence of legal claim.	School, Conservatoire, External auditors, external regulators	Conservatoire insurance policy, Conservatoire Health and Safety Policy (or equivalent), Student Events policy	Date of recording + 3 years	STATUTORY INSTRUMENTS 1995/3163 Regulation 7(3) STATUTORY INSTRUMENTS 1993/2113 Regulation 2
I)	HE-related	Statistics & analysis	1	Provide statistical information regarding student cases to the OIAHE.	b	Processing necessary for the performance of a task in the public interest, namely to provide suitable and specific measures to safeguard the fundamental rights and interest of the data subject	Conservatoire, Schools, OIAHE	Data Processing Statement, Support through studies policy, emergency powers of exclusion and suspension policy, policy on sexual misconduct, harassment and related allegations, non-academic misconduct policy, student complaints procedure, academic regulations, criminal records policy, student protection plan, refunds and compensation policy	Permanent	Enduring value

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I)	HE-related	Statistics & analysis	2	Production of statistical returns required by certain third party bodies e.g. the Higher Education Statistics Agency; Sharing of data with the Higher Education Statistics Agency, the Higher Education Funding Council and Government Departments such as the Department for Education, for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable. For more information on the information shared with HESA please refer to HESA's privacy notice (this disclosure may include sensitive personal data about ethnicity, sexual orientation, gender reassignment and religion): www.hesa.ac.uk/fpn	a, b	Necessary for the performance of a task in the public interest (statutory functions or responsibilities of Government Departments and public bodies) and for statistical and research purposes in the case of disclosures of sensitive personal data.	HESA, OfS, Conservatoire, School	Data Processing Statement	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
I)	HE-related	Statistics & analysis	3	Disclosure of graduate data to third parties such as the Higher Education Statistics Agency as legally required.	a, b	Necessary for statistical purposes (HESA's statistical analysis of graduate employment routes)	HESA, Conservatoire, School, OfS	Data Processing Statement	Completion of analysis	JISC recommendation
I)	HE-related	Statistics & analysis	4	Disclosure of your contact details to survey contractors to carry out the National Student Survey and to the Higher Education Statistics Agency (and its contractor) for the Graduate outcome survey.	a	Necessary for statistical purposes (for both the OfS' and HESA's statistical analysis of student satisfaction and graduate employment routes, respectively)	Conservatoire, Schools, HESA, OfS, Other survey providers (e.g. IPSOS Mori)	Data Processing Statement	Current academic year + 5 years	JISC recommendation
I)	HE-related	Statistics & analysis	5	Disclosure of information about you in statistical or anonymised form to government agencies e.g. the Quality Assurance Agency ('QAA'), the OfS.	b	Necessary for compliance with a legal obligation; Necessary for the performance of a task in the public interest (statutory functions or responsibilities of Government Departments and public bodies) and for statistical and research purposes in the case of disclosures of sensitive personal data.	Conservatoire, Schools, QAA, OfS	Data Processing Statement	Completion of audit + 5 years	JISC recommendation
J)	HE-related	Student casework	1	Submission of data to the police or other regulatory bodies where pursuant to the investigation or disclosure of a potential crime or national security matters such as Benefits or Tax Inspectors, UK Visas & Immigrations and the Foreign and Commonwealth Office	a, d, e	Processing necessary for the performance of a task in the public interest, namely prevention and detection of crime; necessary for the performance of a contract; necessary for legitimate interests	School, Conservatoire, allied public/government services	Schools safeguarding policies, Data Processing Statement, Non-Academic Misconduct policy, Policy on Sexual Misconduct, Harassment and Related Allegations, Criminal	Notification of closure of case + 6 years	Limitations Act 1980 chapter 58 section 5
J)	Higher education	Student casework	2	Disclosure to the Office of the Independent Adjudicator for Higher Education (OIAHE) in relation to individual student complaints, student misconduct, support through studies cases, student appeals and other individual student matters, as well as matters relating to the disclosure of criminal convictions concerning applicants and students. This may include sensitive personal data and/or special category data. For more details please visit: http://www.oiahe.org.uk/media/122698/supplying-personal-data-to-the-oia.pdf	a, c, d, e	Processing necessary for the performance of a task in the public interest, namely to provide suitable and specific measures to safeguard the fundamental rights and interest of the data subject; necessary for the performance of a contract; necessary for legitimate interests	Conservatoire, Schools, OIAHE	Data Processing Statement, Support through studies policy, emergency powers of exclusion and suspension policy, policy on sexual misconduct, harassment and related allegations, non-academic misconduct policy, student complaints procedure, academic regulations, criminal records policy, student protection plan, refunds and compensation policy	Last action on case + 6 years	Limitations Act 1980 chapter 58 section 5
K)	HE-related	Student employment	1	Providing references to prospective employers/companies (including after graduation)	a, d, e	Consent of students/graduates	Schools, Conservatoire, third parties	School Data Processing Statement, Conservatoire Data Processing Statement	End of student relationship + 6 years	Limitations Act 1980 chapter 58 section 5
L)	HE-related	Student support	1	Sharing of data with close family or next of kin and emergency services where there is an emergency situation such as illness or serious injury	a	Processing necessary to protect vital interest of our students or for the legitimate purpose of ensuring the safety and wellbeing of our students	Student, School, Conservatoire, Next of Kin/emergency contact, emergency services, allied public services (e.g. police, hospital, etc.)	Schools safeguarding policies, Emergency Powers of Exclusion and Suspension, Support Through Studies policy, Non-Academic Misconduct policy, Policy on Sexual Misconduct, Harassment and Related Allegations	End of student relationship + 1 year	No legitimate reason to retain this data beyond this period