

## Higher Education Students Data Processing Statement

NCCA is registered as a Data Controller with the Information Commissioners Office ('ICO').  
The School's Registration Number is Z8038992

### ***Definitions***

- **'Criminal record data'** – information about you relating to a crime or alleged crime, or any criminal proceedings for any offence committed or alleged to have been committed by you
- **'Data Controller'** – the person/organisation that determines the purposes for which and the manner in which any personal data are, or are to be, processed
- **'Data processing'** – how the School will use your data
- **'Data Processing Schedules'** – tables (Schedules 1 and 2) that outline how the School holds and processes data, including the types of data, the categories/purposes of processing, where we will share data with third parties, and the lawful bases for processing data, in accordance with Article 6 of GDPR
- **'Data Protection Act 2018' (DPA)** – the legislation that controls how your personal information is used by organisations, businesses and the government
- **'UK General Data Protection Regulations' (UK GDPR)** – regulations that set out how data should be lawfully processed
- **'Graduate alumni'** – former students of the School who hold a NCCA higher education qualification
- **'Lawful basis'** – the legal grounds identified by the School for processing your data
- **'OfS/Office for Students'** – the independent regulator of higher education in England
- **'Personal data'** – personal information about you. Examples of personal data processed by the School include your name, student ID number, application information, attendance, assessment marks, address for correspondence, telephone number, email address, and date of birth
- **'Schedule 1'** – a table which accompanies this Data Processing Statement that sets out how the School holds and processes data that is processed internally in the School.
- **'Schedule 2'** – a table which accompanies this Data Processing Statement that sets out how the School holds and processes data that is provided to and received from third parties/external agencies.
- **'Special Category Data'** – personal information about you (previously commonly known as 'personal sensitive information'). Special category data means any personal data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, sexual orientation, or your genetic and biometric data

- **‘Student’** – an individual registered with the School on a programme of higher education

### **Purpose of this Statement**

This Statement explains how we collect and use your personal data.

NCCA (‘the School’) is the Data Controller for personal data we process about you. The School is registered as a Data Controller with the Information Commissioner’s Office.

Throughout this Notice, “The School”, “we”, “our” and “us” refers to the School and “you” and “your” refers to those expressing an interest in becoming a student at the School both prior to and at formal application stage, together with those who later become a registered student at the Institution. It will also cover information that we must keep after you have left us.

### **Questions, Comments, and Concerns**

If you have questions, comments, or concerns about how your data is used by the School, you can put them in writing to:

NCCA  
Coronet Street, London, N1 6HD

by e-mail at: [data@nationalcircus.org.uk](mailto:data@nationalcircus.org.uk)

or by Phone on: 0207 613 4141

If you think there is a problem with the way the School is handling your data, you have the right to complain to the Information Commissioner's Office: <https://ico.org.uk/>

The School will only use your data fairly and lawfully in accordance with its obligations under the General Data Protection Regulations (‘GDPR’). Any use by the School of your data must also be covered by its registration with the Information Commissioner. This is available on the Information Commissioner's Office website, and describes in a general way how the School processes personal data about students and other individuals.

The GDPR require the School to keep your data secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised disclosure. Only members of staff who need access to relevant parts or all of your data will be authorised to do so. Information about you in electronic form will be subject to security restrictions, while paper files will be stored in secure areas with controlled access.

## 1. Introduction

There is a contractual relationship in place between you and NCCA for the provision of your course as set out in the student terms and conditions document you signed when formally accepting your offer of a place on a course of higher education with us. As set out in the Terms and Conditions, you are responsible for abiding regulations, policies and procedures of NCCA and the University of Kent (the validating university) which are applicable to your studies at the School.

NCCA is a legally autonomous Higher Education institution which is accountable to the Office for Students ('OfS') and is also accountable to the Office of the Independent Adjudicator for Higher Education ('OIAHE'). If you are in receipt of UK Government Funding, the School is also accountable to funding agencies such as the Student Loans Company ('SLC') in connection with your studies. We process your data in connection with these accountabilities and some other activities as set out in this Data Processing Statement ('DPS'). Our registered charity number in England and Wales is 1001839 and we are also registered as a company in England and Wales under registration number 2553293. We also operate two subsidiaries.

Circus Space Events Property Company Ltd – Company Number 4027679

Circus Space Events Ltd – Company Number 4027679

This Statement covers NCCA School's obligations as Data Controller for the purposes of processing your personal data in accordance with the Data Protection Act 2018 ('DPA') and the UK General Data Protection Regulations ('UK GDPR').

NCCA is a 'Data Controller' of your data. We hold and process 'personal data' to enable us to deliver higher education courses in accordance with our statutory obligations and for related business purposes. Such data may include 'Special Category personal data' (as defined in the GDPR) about applicants and students that is provided to us by you or by third parties.

The School will share data as necessary with third parties for the purposes of higher education provision and managing our legal and statutory responsibilities. For more information on the purposes of data sharing by the School, please refer to [Schedule 1](#) and [Schedule 2](#).

NCCA needs to process (that is, collect, use, store and ultimately destroy) personal information about you as a student to be able to record your application to the School, your progress through your course, to classify your final award(s) and to maintain contact as an alumnus of the School. The School is also obliged in some cases to collect information in line with legal requirements (for example to provide details of your enrolment and attendance to the Office for Students).

## 2. How the School obtains/receives your personal data

We obtain or receive personal data about you from the following sources:

- From when you provide your contact details for open day activities or to request further information from us, make an application or register as a student;

- From third party sources (such as other institutions involved in the delivery of joint programmes, Government Departments such as the Home Office or the Student Loans Company, or other individuals such as Schools and Colleges). Where we obtain personal data from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data;
- From you when you disclose personal data during the course of your studies or when accessing our services or resources (e.g. careers advice, counselling, financial support);

### **3. Categories of personal data that we may process**

NCCA collects and processes a broad range of personal data about you in order to deliver our services to you as a student, manage our operations effectively and meet certain legal requirements. Examples of this personal data will include your name, student ID number, application information, attendance, assessment marks, address for correspondence, telephone number, email address, and date of birth.

Personal Data may also contain ‘Special Category Data’, which means any personal data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, sexual orientation, or your genetic and biometric data.

Personal Data may in addition contain ‘criminal record’ data which means information about any criminal offence or alleged criminal offence by you; any proceedings for any offence committed or alleged to have been committed by you; the disposal of such proceedings or the sentence of any court in such proceedings.

‘Special Category Data’ means any Personal Data about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, sexual orientation, or your genetic and biometric data.

When you register with us, you have the option not to provide certain types of ‘sensitive personal data’.

### **4. Types of personal data that may be processed by us**

- 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.

## 5. Purposes for processing data

Accompanying this statement are tables (Schedules 1 and 2) outlining how the National Centre for Circus Arts holds and processes data, including the types of data, the categories/purposes of processing, where we will share data with third parties, and the lawful bases for processing data, in accordance with Article 6 of GDPR.

**Schedule 1** pertains to data which NCCA will process for internal requirements, to allow it to properly fulfil its obligations and functions as a Higher Education Provider.

**Schedule 2** pertains to data which NCCA will process that is required by external parties, to allow it to properly fulfil its obligations and meet statutory and other legal requirements as a Higher Education Provider.

Below for ease of reference are the categories of the purposes for which NCCA may process data. Please refer to the accompanying Schedules 1 and 2 for further details.

Section	Category
A)	Academic Activity
B)	Academic administration
	Academic administration/student support
C)	Admissions
D)	Alumni
E)	Legal compliance
F)	Marketing & corporate
G)	Registration
	Registration/Fees & Finance
	Registration/Student support
H)	Security
I)	Statistics & analysis
J)	Student casework
K)	student employment
L)	Student support

## 6. Data Retention

Different types of data will have different retention periods. These retention periods are outlined in Schedules 1 and 2.

## 7. Your rights

You have the right to:

- Access your personal data that we process;
- To rectify inaccuracies in personal data that we hold about you;
- To be forgotten, that is your details to be removed from systems that we use to process your personal data;
- To restrict the processing of your personal data in certain ways;
- To obtain a copy of your personal data in a commonly used electronic form (data portability);
- To object to certain processing of your personal data by us;

- To request that we stop sending you direct marketing communications;
- To request human intervention where automated decisions (including profiling) have legal or similarly significant effects.

**If you wish to exercise any of the above rights please contact the School's Data Protection Officer via: [data@nationalcircus.org.uk](mailto:data@nationalcircus.org.uk)**

## **8. Responsibilities of students**

If you are a higher education student of NCCA, it is your responsibility to ensure that you provide NCCA with accurate and up-to-date information about yourself when you apply and when you enrol. You must also immediately inform the NCCA in writing of any subsequent changes to your details, such as changes to your name or address.

## **9. Third Parties**

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

To the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you've requested.

To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider). In these cases, we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

To the Higher Education Statistical Agency Limited (HESA), as part of our statutory obligations as a Higher Education Provider.

- [HESA information for NCCA Higher Education students](#)
- [HESA information for NCCA graduates](#)

Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

## **10. What happens after finishing/graduation?**

Some types of personal data are retained long after your studies have ended, for example so that we can verify your award if you apply for a job or further study. Other types of data, particularly if sensitive, may only be retained for a short time.

## **11. Graduate alumni of the School**

NCCA will undertake various activities in which we may request data from graduates (also known as 'graduate alumni'). Such activities may include surveys or questionnaires designed to enable the NCCA to understand the types of career paths and employment that graduate alumni have followed; other activities may, for example, involve exploring the creative work produced by alumni at various times following graduation, and the contexts in which this is produced. NCCA may therefore contact graduate alumni to request such information. The NCCA may also contact graduate alumni to publicise events.

Where graduates of NCCA share data/information with the NCCA regarding events they have organised, the NCCA may share such data/information with current students and staff, as well as on public fora (e.g. Twitter/Instagram etc).

If you are a graduate of NCCA and do not wish to be contacted by the NCCA in this respect, please notify us in writing by emailing your express request to [data@nationalcircus.org.uk](mailto:data@nationalcircus.org.uk)