

# LFS Workshops, Short Courses and Outreach Participants Privacy Policy

## 1. Introduction

This policy is to explain when and why the London Film School ("LFS", "we", "our", "us") collects personal information about workshops, short courses, and/or outreach programme participants ("you", "your") and how it is processed. We aim to be clear about data collection, storage, usage and your rights and to assure you that we would not use your data in a way you would not want or expect us to.

# 2. Scope

This policy applies to all participants of LFS's workshops, short courses and outreach programmes.

# 3. Purpose of Data Collection and Processing

The London Film School needs to hold and process personal data about you for a number of administrative and statutory purposes and to ensure both parties can meet their contractual obligations, namely:

- a) To administer your record from recruitment, to application, enrolment and completion;
- b) To administer and provide academic services, including the provision of teaching and learning, assessment, and recording and monitoring attendance;
- c) To assure, maintain and enhance academic standards;
- d) To maintain your participant records;
- e) If applicable, to ensure you meet the requirements for a short-term study visa and LFS its duties as a Tier 4 sponsor;
- f) To administer your finances, including, but not limited to course fees;
- g) To provide academic support, student services, student support, disability support, library resources and services, and insurance cover if applicable;
- h) To provide IT resources, including access to other systems to ensure you are able to engage with and complete your workshop(s);
- To manage queries, complaints, appeals, allegations of misconduct, grievances and disciplinary actions;
- To ensure safety of all students and prevent and detect crime, including the use of CCTV and student ID cards carrying photographs;
- k) To provide wellbeing and other support services;
- To carry out audits (both internally and externally) to ensure compliance with our statutory, regulatory and legal obligations;
- m) To ensure we can fulfil our statutory, regulatory and legal obligations.

## 3.1. Who Has Access to Your Data and How Is It Shared?

Access to your data in our databases and systems is limited to LFS employees and only for the purposes outlined in section 3.

LFS does not sell data of workshops, short courses or outreach programme participants to third parties. LFS also does not share your data with third parties for marketing purposes.

## 3.1.1. Sharing Your Data with Third Parties

Further, we also share some of your personal information with third parties involved in your education, including visiting lecturers, insurers and external facilities used for teaching and learning.

Some of your data will also be processed and shared in order for LFS to meet its statutory requirements, because it is in the public interest or because it is required for a third party's interest.



In this context, your personal data may be processed and shared as follows:

- a) To provide you with educational and academic services, including course completion and related ceremonies;
- b) To ensure academic standards are maintained;
- c) To monitor LFS's performance as a (higher) education provider;
- d) To improve and enhance the management of the London Film School;
- e) To monitor and promote equality and diversity;
- f) To seek legal advice;
- g) To recover money owed to us;
- h) For fundraising purposes.

The following personal information may be shared with third parties for the purposes listed above:

- a) Your full name;
- b) Your email address;
- c) Anonymised equal opportunities monitoring data;
- d) Anonymised feedback given by you to LFS.

Some of your data will also be processed and shared anonymously in order for LFS to meet its statutory requirements, because it is in the public interest or because it is required for a third party's legitimate interest.

Additional information may be shared with third parties in cases where we need to establish, exercise or defend legal claims.

# 3.1.2. Sharing Your Data for the Purposes of a Visa

While we are not directly involved in the processes for short-term study visas, we will, if required, confirm your place on the course in writing. Such a letter will contain personal information. We will, however, only share this letter with you, not UKVI or the Home Office directly.

If you are already in the UK on a visa, we will require proof of your status and entitlements (e.g. to study). This information, however, will not be shared with third parties other than UKVI or the Home Office.

From time to time, the Home Office may contact us to enquire about your status. LFS will provide this information as per the Home Office guidance.

# 4. Equal Opportunities Monitoring

The London Film School is committed to creating and maintaining a diverse, positive and supportive environment for its workshops, short courses and outreach programmes participants.

In order to monitor this, we may collect equal opportunities monitoring information at the point of application.

Any such information will stay confidential and is kept separate from the application only available to Registry staff. It is not taken into account when considering applicants for a place at the London Film School.

Anonymous statistics are shared more widely across LFS and with third parties both in an effort to monitor equal opportunities, to ensure statutory requirements have been met or because it is required for a third party's legitimate interest.



## 5. What Data Do We Hold, How Do We Collect It and Where Do We Store It?

We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as it is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. Other information is required in order for us to fulfil our contractual obligations.

# 5.1. Data Held by LFS About Workshops, Short Courses and Outreach Programme Participants

The London Film School hold data about you in order to perform its duties and for the performance of a contract.

This information is collected at the point of application or enrolment, using online forms.

We may collect the following types of data:

- a) Your name, date of birth, contact information (including email address, mobile and phone number, Skype user ID, home address, residence address, correspondence address, next of kin contact details and address, emergency contact details, nationality, country of birth, country of permanent residence, UK immigration history and requirements, criminal convictions. We may also ask you to upload a scanned copy of a personal identification document, for example a passport or driving licence.
- b) Programme applied for and start date and admission decisions as well as information on how you intend to pay your fees, including bursary, scholarship or (government) loan applications.
- c) Coursework, assessment forms, grades, module results and course outcomes.
- d) Other information related to your studies, including film credits.
- e) Information provided on equipment sign-out sheets.
- f) Information provided in relation to obtain or ensure adequate insurance covered as required by LFS.
- g) Personal statement (in which you may choose to include personal information), details about proficiency in English, education history, including predicted and actual results and qualifications awarded.
- h) We also ask you to upload a CV as part of your application.
- i) Information about two referees.
- j) Data about you heard about the London Film School.
- k) Bank account, debit or credit card details.
- Finally, we outlined in section 4, we collect personal data to enable equal opportunities monitoring. This includes your gender, gender ID, sexual orientation, ethnicity, disability, religion or similar beliefs.

Finally, additional data may be collected and stored by providers of third party applications used by LFS, including its only application system. This may include IP addresses of users, any location information contained there, and any actions taken by a user while signed into their account, including a timestamp, which may be stored in an activity log.

# 5.2. Data Held by LFS About Workshops, Short Courses or Outreach Programme Participants on Visas

The London Film School is required to record the following for workshops, short courses or outreach programme participants on a visa:

- a) A photocopy or electronic copy of the relevant page, or pages, of your passport and, if applicable, biometric residence permit;
- b) Your contact details up to date UK residential address, telephone number and mobile telephone number;



- c) Records of your attendance at LFS;
- d) Any other evidence that you meet the requirements of your visa;
- e) Any other information required in order for us to meet our sponsor duties.

## 5.3. Data Storage

Data about workshops, short courses or outreach programme participants is stored in various databases and systems used by LFS to conduct its business. Access to those databases is secure and restricted to LFS employees who require it to perform their duties.

Some of these databases and systems used are provided and hosted by a third-party provider who will publish their own privacy policies.

LFS is committed to reviewing privacy and data protection policies of providers of third-party systems on a regular basis.

Portable data storage devices (including, but not limited to USB flash drives, magnetic tapes and optical discs) are not used to store, process or transfer personal information, but may be used to stored and transfer other types of data.

#### 6. Data Retention

Your personal data will be processed and retained for the performance of a contract as per this policy for the duration of your workshop, short course or outreach programme event.

At the point of completion of the workshop, we will continue to store the following information in our systems in perpetuity unless you exercise your right to erasure (see section 9.2):

- a) Your name, including any previous name(s) (if applicable);
- b) Name of workshop, short course or outreach programme completed;
- c) Any donations made (if applicable).

Any records pertaining to your finances will be retained by the Finance Department for up to six years following the end of the fiscal year to which they relate.

Any records related to insurance matters (including, but not limited to Statements of Fact and equipment sign-out sheets) will be retained for up to five years following the event covered by the insurance.

CCTV footage recorded by LFS's systems is normally stored for 28 days. CCTV footage may be retained beyond 28 days if it is likely to be required to establish, exercise or defend legal claims.

## 7. Updating Your Data

It is important to us that we always hold the most-up-date information about you. To update your data held by LFS, please email my.data@lfs.org.uk.

Once a request has been received, it is normally processed within one month.

# 8. How Do We Contact You?

Our communications are normally by email and most communications are only sent out via email. In some instances, however, we may also contact you by phone (mobile or home). In some cases, we will also contact you by post.

Workshops, short courses and outreach programme participants are contacted via personal email accounts.

Workshops, short courses and outreach programme participants may restrict the usage of their personal email address as outlined in section 9.3.



If you have previously opted in to receiving the LFS newsletter, LFS workshops newsletter, emails about events or fundraising and would like to no longer receive those email, you can opt out by emailing <a href="mailto:my.data@lfs.org.uk">my.data@lfs.org.uk</a>.

You may opt out of receiving the LFS newsletter, LFS workshops newsletter, emails about events or fundraising, but it is necessary for LFS to communicate with you about matters pertaining to your studies, support and welfare for the performance of a contract.

# 9. Your Rights

## 9.1. Right to Access

Workshops, short courses and outreach programme participants have the right to access the personal and supplementary information held about them by the London Film School.

To access this information, please email my.data@lfs.org.uk.

Information will be provided at the latest within one month of receipt.

## 9.2. Right to Erasure

At the point where we no longer need to process your data for the performance of a contract, you have the right to ask us to stop processing your personal data. Please note that this does not apply if you are a current workshops, short course or outreach programme participant. If you choose to exercise this right, we will delete most of your personal data held by LFS.

We will, however, retain some basic information, more specifically:

- a) Your name, including any previous name(s) (if applicable);
- b) Name of workshop, short course or outreach programme attended;
- c) Any donations made (if applicable);

Any data that remains on our database(s) can only be accessed by relevant staff for administrative or statistical (anonymous) purposes. Please refer to section 9.4 if you do not want your data to be used for statistical purposes.

Any records pertaining to your finances, with the exception of information obtained in the context of Tier 4 visas, will be retained for up to six years.

To exercise your right to erasure, we suggest that you send us an email at <a href="my.data@lfs.org.uk">my.data@lfs.org.uk</a>. You may also make your request verbally by contacting a member of the Management Team who will confirm your request in writing and pass on your request to relevant members of staff.

Your request will be processed with one month and after having received and processed your request, we will no longer contact you by email, phone or post or any other means.

# 9.3. Right to Restrict Processing

You have the right to restrict the way in which your data is processed as long as the processing falls outside the performance of a contract.

To exercise your right to restrict processing, we suggest that you send us an email at <a href="my.data@lfs.org.uk">my.data@lfs.org.uk</a>. You may also make your request verbally by contacting a member of the Management Team who will confirm your request in writing and pass on your request to relevant members of staff.

Your request will be processed with one month.



# 9.4. The Right to Object

You have the right to object to your data being used for purposes of scientific/historical research and statistics.

To exercise your right to object, please email <a href="my.data@lfs.org.uk">my.data@lfs.org.uk</a>.

# 9.5. Rights in Relation to Automated Decision Making and Profiling

The London Film School does not use automated decision making or profiling in the context of its workshops, short courses or outreach programme participants.

We may, however, use your personal information to ensure study groups are diverse and reflect the diverse nature of the London Film School. This is not done in an automated way and with a view that it benefits the participants' experience.

# 10. Changes to our Privacy Policies

Our privacy policies are reviewed regularly, usually on an annual basis. Updates will be posted on the LFS website.

If we ever make significant changes to the way we process your personal data, we will either clearly highlight this on our website or write to you directly.

#### 11. Version Control

Version Number	Changes	Author, Title	Date
0.1	-	Philip Ramge, Academic Registrar	01/05/2018
0.2	Comments from LFS Open staff added; policy renamed to reflect wider scope of the policy	Philip Ramge, Academic Registrar	03/05/2018
1.0	Approved by Management Team	-	08/05/2018