



Data Protection and Privacy Policy

Sharpe Academy is committed to providing parents, students, clients and customers with a clear understanding about what data we store and how we use their data. We try where possible to only hold data digitally using secure and protected software. We do however at times require hard copy information such as sign in/out registers, medical details, agency client details, customer shipping labels and examination information.

1. Departments of Sharpe Academy

Sharpe Academy of Theatre Arts Limited is one company with several brands:

- **Sharpe Academy of Theatre Arts** – Classes, Productions, Holiday Schools and Website (sharpeacademy.co.uk).
- **Agent Sharpe** – Agency representing children aged 6-18 and graduates aged 18+ in the stage, television and film industry.
- **Sharpe Dancewear** – Online Dancewear store (sharpedancewear.co.uk) for uniform, dancewear, dance shoes, musical books, Academy courses, tickets & examination fees, etc.

2. Student and applicant data protection notice

This notice sets out how we deal with the personal information of people who are applying to, or studying at, the Academy. This notice may be updated from time to time to ensure continued compliance with current legislation and to reflect best practice.

3. What personal information do we collect about you?

3.1 The following gives an indication of the types of information which are currently collected and processed at different stages from application, through to enrolment and throughout your time at the Academy:

- your name and your student number;
- details of your qualifications achieved and currently being undertaken;
- details of relevant criminal convictions;
- identity document/s such as your passport information
- your permanent and term time addresses and your contact details including email and other electronic identifiers
- your gender and date of birth
- your nationality
- disability or other medical information
- emergency contact details
- your attendance at the Academy (including any suspension or exclusion information)
- how your studies are funded, including fee information and any sponsorship details
- equality of opportunity monitoring data which will include sensitive categories of data (e.g. ethnicity, religion, sexual orientation)
- details of your academic record including qualifications, skills, experience and educational and employment history
- details of your examination and assessment results during your time at the Academy
- details of any pastoral, financial, care or academic support given prior to, or during, your time at the Academy
- details of any disciplinary or conduct issues
- details of any professional body registration

This personal data includes categories of data classed as 'special categories' such as that collected for equality of opportunity monitoring such as ethnicity, religious beliefs or sexual orientation.

- 3.2 The Academy collects this information in a variety of ways. For example, data might be collected through the application process, or obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the enrolment; or through interviews, meetings or other assessments.
- 3.3 We will also hold information supplied by third parties such as references and information from criminal records checks (if necessary for your course).

4. How we get your personal information and why do we have it?

Your personal data is provided to us by you. There are a number of legal ways in which we can process your data, the most relevant of which are set out below:

- 4.1 By applying or enrolling as a Sharpe Academy student, we will be required to collect, store, use and otherwise process information about you for any purposes connected with teaching, support, research, administration, your health and safety and for other reasons deemed necessary for the purpose of entering into or for the performance of your contractual agreement with the Academy. We will also use your information for certain purposes after you cease to be a student.
- 4.2 Processing is carried out with your explicit consent. When we rely on your consent to process we will do so to provide a positive opt-in, in a clear and concise manner with an explanation as to how you can withdraw your consent.
- 4.3 Processing of your personal data may also be necessary for the pursuit of our legitimate interests or by a third party's legitimate interests – but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on your rights and freedoms, or legitimate interests.
- 4.4 Processing of your personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Academy and for statistical and research purposes.
- 4.5 Processing of Special Categories data is necessary for statistical and research purposes based on the duties in the Equality Act 2010.

5. For what purposes will your information be used?

The purposes and related legal basis (number in brackets) under which Sharpe Academy may process your personal data, (although given the complexity of the relationships that the Academy has with its students, this is not exhaustive):

- administration (including application, enrolment, assessment, disciplinary matters, health matters)
- to organise your studies
- the production and, as appropriate, distribution of research and educational materials
- access to, and security of, Academy facilities
- to consider and provide support for disability or health related adjustments
- to assist in pastoral and welfare needs
- internal and external auditing purposes
- meeting health and safety obligations and equality of opportunity monitoring obligations
- promotion of the Academy's academic and vocational expertise profile and furtherance of the Academy's development programme, as appropriate
- collection of CCTV images for the prevention of crime and prosecution of offenders and other purposes
- provide other activities within the Academy business
- for consideration of 'fitness to practise' or 'fitness to study' issues
- to produce management statistics and to conduct research into the effectiveness of our programmes of study
- carrying out statutory duties to provide information to external agencies
- from time-to-time, other activities that fall within the pursuit of the Academy's legitimate business and do not infringe your rights and freedoms
- orientation (including virtual orientation)
- to provide you with any advice and information which you have requested
- to contact you with further information we think you might be interested based on, where possible, the course(s) you have applied for
- to monitor the effectiveness of marketing material by analysing opened mail returns and click-throughs

- to create lookalike audiences for the purposes of advertising to users with similar characteristics on platforms such as Facebook, Instagram, Twitter, Snapchat or TikTok. You can update your preferences by accessing your privacy settings on these sites.

6. Sharing information with others

At Sharpe Academy we do not share any information with third parties unless we are required to do so by law or for any of the following reasons:

- A student takes an examination (Data is shared with the relevant Examination Board).
- A student has joined Agent Sharpe (Data is shared with the Spotlight Casting Directory & Casting Directors for Spotlight Membership, and other Casting providers).
- A student aged under 16 takes part in a Sharpe Academy production which requires a Body of Persons licence (Data is shared with the local authority for the area in which the production takes place, for example Harrow County Council).

Any other disclosures that the Academy makes will be in accordance with Data Protection law and your interests will always be considered.

7. How long your information will be held

Please refer to the Academy's Retention Policy.

8. Security of your information

- 8.1 Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant personal data will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, while paper files will be stored in secure areas with controlled access.
- 8.2 Some processing may be undertaken on the Academy's behalf by an organisation contracted for that purpose. Organisations processing personal data on the Academy's behalf will be bound by an obligation to process personal data in accordance with data protection legislation.

9. Your data protection rights

Under Data Protection legislation you have a number of rights such as a right to request (in writing) a copy of your personal data held by the Academy.

10. Your responsibilities

- 10.1 You have a responsibility to notify the Academy of any changes to your personal details.
- 10.2 During the course of your studies you may have access to personal information about others. You are expected to treat this in a responsible and professional manner and are legally required to do this under the data protection legislation, as well as any professional ethics or codes of conduct. Where, in the support of your studies, you submit to the Academy the personal information of others (eg as part of an extenuating circumstances application) you should ensure that you have the permission of those individuals to do so.
- 10.3 If you are made aware of personal information in confidence including regarding someone's mental or physical health then you are expected to not tell anyone without the individual's consent, unless there are exceptional circumstances.
- 10.4 You should also not seek to gain others' personal data if you are not entitled. Disciplinary action will be considered for any Academy member who breaches the Data Protection Act or a duty of confidence.

11. Do we transfer information outside the European Economic Area (EEA)?

Generally, information you provide to us is stored on our secure servers, or on our cloud based systems which are located within the EEA. However, there are times when we do need to store information outside the EEA. If we transfer your information outside the EEA, we will take steps to ensure that appropriate security measures are taken to protect your privacy rights. This could be by imposing contractual obligations on the recipient of your personal information, or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Technical measures such as encryption will also be considered.