

# **Royal Academy of Dramatic Art**

# **Data Sharing Policy – HEAT (Higher Education Access Tracker)**

#### 1. Introduction

The Royal Academy of Dramatic Art (RADA) recognises the importance of student data privacy and the need to comply with relevant data protection laws. This policy outlines how RADA will share and handle data within the framework of the Higher Education Access Tracker (HEAT) and ensure the appropriate use, security, and transparency of all shared information.

# 2. Purpose of Data Sharing

RADA will use HEAT as part of its efforts to track and support access to higher education for students from underrepresented backgrounds. HEAT is a tool that enables institutions to collaborate, exchange data, and provide targeted support to prospective students, ensuring they receive the guidance and resources necessary for their successful transition to higher education.

The specific purposes of data sharing through HEAT are:

- To identify, track, and support students from disadvantaged backgrounds who are interested in pursuing higher education.
- To measure the impact of outreach and widening participation initiatives.
- To collaborate with other institutions and organisations focused on widening access to higher education.

## 3. Data to be Shared

The data shared through HEAT will primarily include personal and academic information, such as:

- Name and contact information (email, phone number, etc.)
- Postcode and demographic details (e.g., ethnicity, socio-economic background)
- Academic records and achievements (e.g., GCSEs, A-levels, or equivalent)
- · Participation in outreach and widening access activities
- Any additional information directly related to students' interest in higher education

### 4. Legal Basis for Data Sharing

RADA will share and process data in accordance with the following:

- General Data Protection Regulation (GDPR): The lawful basis for processing personal data will be consent from the individual (students), contractual obligations, and legal obligations.
- **UK Data Protection Act 2018**: RADA will ensure all data processing activities comply with the Data Protection Act and any related regulations.
- Consent and Transparency: Students and their guardians will be explicitly informed
  about how their data will be used. They retain the right to opt out of data sharing for HEAT
  purposes by contacting RADA's Data Protection Officer or using the contact details in
  RADA's privacy policy

## 5. Data Security

RADA is committed to ensuring the confidentiality, integrity, and availability of personal data. Data shared through HEAT will be protected using appropriate technical and organisational measures, including:

- Secure data transfer protocols and encryption.
- Limited access to data based on the principle of least privilege.
- Regular audits and reviews of data access and usage.
- Data minimisati0on, ensuring only the minimum necessary data is shared.

#### 6. Data Retention

Data shared through HEAT will be retained for no longer than necessary to fulfil its intended purpose, in accordance with <u>HEAT's data retention policy.</u> RADA will ensure that all personal data is deleted or anonymised in compliance with data retention policies and applicable regulations once it is no longer required.

## 7. Responsibilities and Oversight

RADA's Data Protection Officer (DPO) will be responsible for overseeing compliance with this policy, including monitoring the security of data sharing activities and ensuring that appropriate safeguards are in place. RADA will also provide training to relevant staff on the handling and sharing of personal data in accordance with this policy.

#### 8. Third-Party Data Sharing

RADA will not share student data outside the HEAT system, except where required by law or with explicit consent from the student/parent. Data shared with partner institutions through HEAT will only be used for the purposes stated above and will be subject to the same data protection and privacy requirements as outlined in this policy.

# 9. Rights of Data Subjects

Students whose data is shared through HEAT have the following rights:

- Right to Access: Students have the right to request access to their data held by RADA.
- Right to Rectification: Students can request corrections to inaccurate data.
- **Right to Erasure**: Students have the right to request that their data be deleted, subject to any applicable legal or contractual obligations.

- **Right to Object**: Students can object to the processing of their data for certain purposes, including marketing.
- **Right to Portability**: Students can request to receive their data in a structured, commonly used, and machine-readable format.

## 10. Transparency and Communication

RADA will ensure that all individuals whose data is shared through HEAT are fully informed about how their data will be used. Information about the data sharing process will be provided through:

- The RADA website and relevant promotional materials.
- Letter to students, parents and their guardians
- Clear communication during outreach events and student interactions.

# 11. Review and Updates

This policy will be reviewed annually and updated as necessary to ensure compliance with changes in data protection legislation and best practices. Any significant changes to the policy will be communicated to all relevant stakeholders, including students and staff.

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Approved by	SLT
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