



North London College

General Data Protection Regulation

Company Name: North London College

Company Address: 376 High Road, London N17 9HY

Introduction

North London College is committed to upholding the privacy of its learners and employees and conforming towards the General Data Protection Regulation (GDPR). To achieve this commitment, information about our learners, employees and other clients, contacts and other stakeholders must be collected and used fairly, stored safely and not unlawfully disclosed to any other person or third party. It should be clear why the data has been collected and how it will be used.

It is a policy to make as much information public as possible and in particular the following information will be available to the public.

- Names of our Directors
- Photographs of key staff
- List of staff
- Learner performance data

Principles

The College, its staff and others who process or use any personal information must ensure that they follow the data protection principles set out in the GDPR. The college will ensure that the following is adhered to pertaining to Data.

- Be obtained and processed fairly and lawfully
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose
- Be adequate, relevant and not excessive for those purposes
- Be accurate and kept up to date
- Not be kept longer than is necessary for that purpose
- Be processed in accordance with the data subject rights
- Be kept safe from unauthorized access, accidental loss or destruction
- Not be transferred to a country outside the European Economic area, unless that country has equivalent levels of protection for personal data

The College will not release staff or learner data to third parties except to relevant statutory bodies. In all other circumstances the College will obtain the consent of the individuals concerned before releasing personal data.



North London College

Use of Personal Data

The college uses personal data to:

- Keep those who contact us up to date on news and stories about work at the college
- Provide a personalised service, such as customised website content or personalised emails
- Keep records of questions, suggestions, or complaints made by those who contact us
- Conduct market research to help understand our customers and the views they give.

Responsibilities

The management is responsible for the oversight and implementation of this policy.

The Principal and Senior Staff Members It will be the responsibility of the Principal and senior staff to ensure compliance with the policy and for communicating the policy to all staff.

All staff are responsible for ensuring that any personal data, which they hold, is kept securely and personal information is not disclosed in any way and to any unauthorised third party. All staff are responsible for ensuring any personal data provided to the college is accurate and up to date.

All learners are responsible for ensuring that all personal data provided to the College is accurate and up to date.

Use of personal data

We may use the personal data we collect to:

- Keep you up to date on news and stories about our work.
- Provide a personalised service, such as customised website content or personalised emails.
- Keep records of your relationship with us e.g. questions you have asked or suggestions or complaints you have made.
- Conduct market research to aid our understanding of our customers and their views.

We may use publicly available information such as newspaper articles, or information you have given permission to other organisations to share such as LinkedIn.

Consent

As at 1 March 2018, the college will process your personal data on the basis of the consent you provided us with. You are free to change your preferences at any time by contacting us by telephone, post or email as shown in the section 'Your rights and telling us when things change' below.

Content – existing learners

If you are an existing learner as at 1 May 2018, we may continue to contact you by email where your consent has previously been given. Please be aware we may contact you by post or telephone and/or send you course information

We will keep your personal information only for as long as we consider it necessary to carry out each activity.



North London College

Safety and duration of information

We will hold information only as long as deemed necessary and you have the right to ask us to remove the data we hold about you. Our network is robustly protected from unauthorized access and is routinely monitored.

We ensure that access to personal data is restricted only to those staff members or associates whose job roles require such access and that suitable training is provided for these staff members and associates.

We may make limited use from time to time of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

Where we store your personal information

We use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data, you agree to this transfer, storing and processing of your information. Should you travel overseas for us, we may share personal information with partners who deliver our work in overseas locations. For example, this may include sensitive personal data such as medical information. When we do so we will make you aware of the data being transferred and seek your consent to do so.

Credit / debit card security

We may use a third party to process payments using cards but will ask them to process your information in line with the GDPR and the Payment Card Industry Data Standard.

If you use your debit or credit to pay for something, whether online or over the phone, we will process your information securely in accordance with the Payment Card Industry Data Standard.

We do not store your debit or credit card details once your transaction has completed. All card details are securely destroyed once your payment has completed. We hold bank account details for the purpose of paying invoices to providers and associates.



North London College

Our service providers and third parties

We may employ associates to carry out tasks on our behalf, such as Learner Verifications or Health Checks. These associates are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

Your rights and telling us when things change

We fully recognise your right to have your data removed, to be forgotten, to opt out of communications or withdraw consent and to have a copy of your personal data.

Telling us to stop processing

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at: 376 High Road, London N17 9HY.

Procedure

Rights of Access Information

Should you wish to exercise the right to request the information held about you please write to the Access to Data Personal/Data Controller 376 High Road, London N17 9HY. You will be sent the form at appendix 1.

The College will make a charge on each occasion that access is requested, although the College has discretion to waive this. This charge will be automatically waived off for staff.

The College aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 21 days unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the data subject making the request.

Conclusion

Compliance with the GDPR is the responsibility of all members of the College. Any breach of the policy may lead to disciplinary action being taken, access to the College being withdrawn, or even a criminal prosecution. Any questions or concerns about the interpretation of this policy should be referred to your line manager.



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Appendix 1

STANDARD REQUEST FORM FOR ACCESS TO DATA

I.....wish to have access to either:

1. All the data that North London College currently has about me, either as part of an electronic system or part of a relevant filing system; or
2. North London College has about me in the following categories:
 - Academic marks or course work details;
 - Academic or employment references;
 - Disciplinary records;
 - Health and medical matters;
 - Political, religious or trade union information;
 - Any statements of opinion about my abilities or performance;
 - Personal details including name, address, date of birth;
 - Other information (please specify)

I understand the access request incurs a fee of £10.00

Sign.....

Date.....