



General Data Protection Regulation (GDPR) Policy

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Approved by: Senior Management Team and BoG

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Version Control Table:

Version	Date	Change Description	Author / Editor	Approved By
3	27/05/2025	The entire policy has been reviewed and updated to ensure it is fit for purpose in line with statutory requirements, LPC's operation. Data Protection Lead has been defined.	Arafat Hossain	SMT and BoG

1. Policy Statement

London Professional College (hereinafter referred to as "LPC") acknowledges its statutory responsibilities and the importance of data protection and privacy in the digital age. As an institution dedicated to providing education and training, the College recognises its responsibility to safeguard the personal data of students, staff, and any individuals associated with its operations.

2. Purpose

This policy outlines how LPC collects, uses, protects, and disposes of **personal** data to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Commented [CC1]: Font size changes

3. Scope

Applies to all staff, contractors, and third parties handling personal data on behalf of LPC, including data related to students, staff, suppliers, partners and any other individuals whose data is dealt with during the College's activities.

4. Key Principles of Data Processing

LPC is committed to processing all personal data in a lawful, fair, and transparent manner. Data is collected only for specified, explicit, and legitimate purposes and is not further processed in a way that is incompatible with those purposes. The College ensures that only adequate, relevant, and limited data is collected, no more than is necessary for the intended purpose. All personal data is maintained accurately and, where necessary, updated promptly. It is retained only for as long as required and is stored securely to safeguard against unauthorised or unlawful processing, accidental loss, destruction, or damage. Finally, LPC acknowledges its responsibility to demonstrate compliance with these principles and maintains appropriate documentation and accountability mechanisms accordingly.

5. Lawful Basis for Processing

LPC ensures that all personal data is processed only when there is a clear and valid legal basis under the UK GDPR. Depending on the nature of the data and the context in which it is collected, the lawful basis may include obtaining the individual's consent, fulfilling contractual obligations, complying with a legal duty, protecting someone's vital interests, carrying out tasks in the public interest, or pursuing legitimate interests, provided these are not overridden by the rights and freedoms of the data subjects. The specific lawful basis for each processing activity is **documented**, and individuals are informed accordingly, particularly where consent is relied upon, ensuring that such consent is freely given.

Commented [CC2]: Some of this information relates to staff. How do you know that each processing activity is documented? Do you need a sentence paragraph at the start which explains LPC responsibilities and HR responsibilities.

Commented [AH3R2]: At LPC, we have designated forms to process the personal Data. For example, application forms. And also, the disclaimers are in place.

6. Roles and Responsibilities

Data Protection Lead (DPL): Appointed senior staff member responsible for overseeing data protection compliance and responding to data subject requests. At LPC, Arafat Hossain is the DPL.

All staff: Members of staff who handle personal data must handle it responsibly and adhere to this policy.

7. Types of Personal Data Collected

LPC collects and processes personal data that is necessary to support its educational and administrative functions. This includes information provided during the admissions process, such as contact details, educational history, and proof of identity; academic records, including assessments, attendance, and progression data; employment-related data for staff, such as payroll, qualifications, and performance information; and communications or IT-related data that may arise from the use of college systems. The College ensures that all data collected is relevant, appropriate, and limited to what is necessary for the purposes for which it is processed.

8. Data Subject Rights

LPC recognises and upholds the rights of individuals under the UK GDPR in relation to their personal data. These rights include the right to be informed about how their data is used, the right to access the data held about them, and the right to have inaccurate or incomplete data rectified. Individuals also have the right to request the erasure of their data when it is no longer necessary, to restrict or object to processing under certain circumstances, and to receive their data in a portable format where applicable. LPC ensures that all such requests are handled promptly and transparently, with appropriate verification measures in place to confirm identity. All requests should be directed to the Data Protection Lead, and responses will be provided within one calendar month, in line with legal requirements.

9. Data Security

LPC is committed to ensuring the security of all personal data in its possession and takes appropriate technical and organisational measures to protect it against unauthorised access, loss, misuse, or destruction. Personal data is stored using secure systems that include encrypted servers, restricted access controls, and secure backup solutions. Access to data is limited strictly to authorised personnel who require it for legitimate operational purposes, and these permissions are reviewed regularly. Staff receive training on best practices for secure data handling, and LPC conducts routine assessments to evaluate and enhance its data protection protocols. These measures help ensure that the confidentiality, integrity, and availability of data are consistently maintained across the organisation.

10. Data Retention

Commented [CC4]: Is this in your JD?

Commented [CC5R4]: Should you be clear that your role relates to learners and you liaise with HR for data relating to staff?

Commented [AH6R4]: The data subject can be anyone.

Commented [AH7R4]: Data protection responsibility is covered in my JD in a broader aspect as a regulatory requirement.

Commented [CC8]: Is this learner data?

Commented [CC9R8]: Do all staff access payroll data etc?

Commented [AH10R8]: No, not all staff have access to the payroll data

Commented [AH11R8]: No, this is not only learners' personal data, but also the personal data of staff. For example, Dena and Snehal handle the personal data of their faculty staff.

Data will be retained only as long as necessary. LPC follows a retention timeframe based on legal, regulatory, and operational needs. Data no longer required will be securely deleted or destroyed.

11. Data Sharing and Third Parties

LPC only shares data with trusted partners when necessary, under data sharing agreements or contracts that include GDPR clauses and carries out due diligence before engaging with third parties. LPC does not sell personal data.

Commented [CC12]: AOs may stipulate how long data is held. What are the rules at Gateway?

Commented [AH13R12]: For Gateway, data must be retained for three years following the completion of the course. We should not specify any defined timeframe in our policy, as the UK GDPR does not set specific time limits for different types of data.

12. Data Breach Management

All suspected data breaches must be reported to the DPL immediately. Serious breaches will be investigated promptly, notify affected individuals if needed and reported to the ICO within 72 hours, where applicable.

13. Training and Awareness

All staff must complete basic data protection training annually. Additional support is provided as needed.

14. Policy Review

This policy is reviewed annually by the DPL / SMT or when significant changes in legislation or operations occur.

Contact:

For concerns or to exercise your data rights, contact LPC's Data Protection Lead at arafat.h@londonpc.org.uk.

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