



# **Data Protection Policy**

## Principles

In order to operate effectively and fulfil its legal obligations, Alexander London College needs to collect, maintain and use certain personal information about current, past and prospective employees, students, customers, suppliers and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the safeguards contained in the Data Protection Act 2018

Alexander London College is committed to the eight principles of data protection as detailed in the DPA. These principles require that personal information must:

- be fairly and lawfully processed and not processed unless specific conditions are met;
- be obtained for one or more specified, lawful purposes and not processed in any manner incompatible with those purposes;
- be adequate, relevant and not excessive for those purposes;
- be accurate and, where necessary, kept up to date;
- not be kept for longer than is necessary;
- be processed in accordance with the data subject's rights under the DPA;
- be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage; and
- Not be transferred to countries outside the European Economic Area (EEA), unless the country or territory ensures adequate protection for the rights and freedoms of the data subjects.

## Compliance

In order to comply with the data protection principles, ALEXANDER LONDON COLLEGE will:

- observe fully all conditions regarding the fair collection and use of personal information;
- meet its legal obligations to specify the purpose for which information is used;
- collect and process appropriate personal information only to the extent that it is needed to fulfil operational needs or to comply with legal obligations;
- ensure the quality of the personal information used;
- apply strict checks to determine the length of time personal information is held;
- ensure that individuals about whom information is held are able to exercise their rights under the DPA, including the right to be informed that processing is taking place, the right of access to their own personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase incorrect information;
- take appropriate technical and organisational security measures to safeguard personal information; and
- Ensure that personal information is not transferred outside the EEA without suitable safeguards.

## Responsibilities

- Overall responsibility for ensuring that the Trust complies with its data protection obligations rests with the Chief Executive Officer.
- It is the responsibility of all employees to ensure that personal information provided to the Trust, for example current address, is accurate and up to date. To this end employee are required to inform the Trust immediately when changes occur.
- Employees who are involved the collection, maintenance and processing of personal information about other employees, students, customers, suppliers or any other individuals with whom the Trust has dealings are responsible for following the Trust's rules on good Data Protection practice as notified from time to time by the Management

## **Information about Employees**

Alexander London College holds the following personal information about its employees:

Name, Address, Salary, Partner Name, Telephone Numbers, National Insurance Number, Previous Employment details, References.

This information is used for Payroll and Administrative purposes.

We also hold the following sensitive personal information about employees:

Racial or Ethnic origins; Physical or mental health or condition, DBS (previously CRB) Check information, Passport copies, immigration/visa copies.

This information is used for the purpose of Equal Opportunities monitoring / Health and Safety monitoring.

## **Access to Information**

Anyone who is the subject of personal information held by the Alexander London College has the right to make a subject access request. Employees who wish to exercise this right should write to Chief Executive. The Alexander London College reserves the right to charge £25 for responding to such requests. If, as the result of a subject access request, any personal information is found to be incorrect it will be amended. The Trust will deal promptly with subject access requests and will normally respond within 40 days. If there is a reason for delay, the person making the request will be informed accordingly.

## **IT Communications and Monitoring**

Alexander London College provides employees with access to various computer facilities for work and communication purposes. In order to ensure compliance with all applicable laws in relation to data protection, information security and compliance monitoring, the Trust has adopted an IT Communications and Monitoring Policy, which should be read in conjunction with this Data Protection Policy.

## **Breach of the Policy**

Breach of this policy will be regarded as a disciplinary offence and will be dealt with under the formal Discipline Procedure.

Employees who consider that there has been a breach of this policy in relation to personal information about them held by the Trust should raise the matter via the formal Grievance Procedure.