

DATA PROTECTION POLICY

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1. Imperial College of Excellence (ICE) holds and processes information about employees, students, and other data subjects for academic, administrative and commercial purposes. When handling such information, London ICE must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the Act).

In summary, these state that personal data shall:

- Be processed fairly and lawfully,
- Be obtained for a specified and lawful purpose and shall not be processed in any manner
- Incompatible with the purpose,
- Be adequate, relevant and not excessive for the purpose
- Be accurate and up-to-date,
- Not be kept for longer than necessary for the purpose,
- Be processed in accordance with the data subject's rights,
- Be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

Definitions

- "Data controller" further information about College data controllers is available from the Data Protection Officer
- "Staff", "students" and "other data subjects" may include past, present and potential members of those groups.
- "Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees, friends or family members.
- "Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information

2. Notification of Data Held

ICE shall notify all staff and students and other relevant data subjects of the types of data held and processed by ICE concerning them, and the reasons for which it is processed. When processing for a new or different purpose is introduced, the individuals affected by that change will be informed.

3. Staff Responsibilities

All staffs shall

- Ensure that all personal information which they provide to ICE in connection with their employment is accurate and up-to-date;
- Inform ICE of any changes to information, for example, changes of address, immigration status in case of Non-EU/UK/EEA;
- Check the information which ICE shall make available from time to time, in written or automated form, and inform ICE of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. ICE shall not be held responsible for errors of which it has not been informed.

When staff hold or process information about students, colleagues or other data subjects (for example, students' course work, references to other academic institutions, or details of personal circumstances), they should comply with the Data Protection Guidelines.

All staffs shall ensure that

- All personal information is kept securely;
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

When staff supervises students doing work which involves the processing of personal information, they must ensure that those students are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

4. Student Responsibilities

All students shall

- Ensure that all personal information which they provide to ICE is accurate and up-to-date;
- Inform ICE of any changes to that information, for example, changes of address, new visa granted;
- Check the information which ICE shall make available from time to time, in written or automated form, and inform ICE of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. ICE shall not be held responsible for errors of which it has not been informed.

Students who use ICE computer facilities may, from time to time, process personal information (for example, in course work). In those circumstances, they must notify ICE in the relevant department for further information about this requirement.

5. Rights to Access Information

- 5.1. Staff, students and other data subjects in ICE have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to ICE Principal.
- 5.2. ICE aims to comply with requests for access to personal information as quickly as possible.

6. Subject Consent

- 6.1. In some cases, such as the handling of sensitive information ICE is entitled to process personal data only with the consent of the individual. Agreement to ICE processing some specified classes of personal data is a condition of acceptance of a student on to any course, and a condition of employment for staff.
- 6.2. ICE may process sensitive information about a person's health, disabilities, criminal convictions, race or ethnic origin in pursuit of the legitimate interests of ICE. ICE may also require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy, or for academic assessment.
- 6.3. ICE also asks for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma or diabetes. ICE will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency. The consent of the data subject will always be

sought prior to the collection of any sensitive data as defined by the Act.

7. The Data Controller and the Designated Data Controllers

7.1. **ICE Principal is the data controller**, and the Principal is ultimately responsible for implementation. Responsibility for day-to-day matters will be delegated to the Principal. Information and advice about the holding and processing of personal information is available from the Principal.

8. Assessment Marks

8.1. Students shall be entitled to information about their marks for assessments; however this may take longer than other information to provide. ICE may withhold enrolment, certificates, accreditation or references in the event that monies are due to ICE.

9. Retention of Data

9.1. ICE will keep different types of information for differing lengths of time, depending on legal, academic and operational requirements.

10. Compliance

10.1 Compliance with the Act is the responsibility of all students and members of staff. Any deliberate or reckless breach of this Policy may lead to discipline, and where appropriate, legal proceedings.

10.2 Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the Principal immediately.