

Phoenix College, London

Data Protection, Privacy and UK GDPR Policy

1. Purpose

This policy outlines Phoenix College's commitment to protecting the personal data of its students, staff, and stakeholders in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It sets out how personal data is collected, used, stored, and protected.

2. Scope

This policy applies to all employees, students, contractors, volunteers, and third parties who process personal data on behalf of Phoenix College.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Special Category Data:** Sensitive data including racial or ethnic origin, political opinions, religious beliefs, health data, etc.
- **Processing:** Any operation performed on personal data, including collection, storage, use, and deletion.
- **Data Subject:** The individual whose personal data is being processed.
- **Data Controller:** Phoenix College, which determines the purposes and means of processing personal data.
- **Data Processor:** A third party that processes personal data on behalf of the College.

4. Legal Framework

This policy is based on the UK GDPR and the Data Protection Act 2018. It also aligns with guidance from the Information Commissioner's Office (ICO).

5. Data Protection Principles

Phoenix College adheres to the following principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality

- Accountability

6. Roles and Responsibilities

- **Governing Body:** Ensures compliance with data protection laws.
- **Principal:** Overall accountability for data protection.
- **Data Protection Officer (DPO):** Monitors compliance, advises on obligations, and acts as the contact point for the ICO.
- **All Staff and Contractors:** Must comply with this policy and attend relevant training.

7. Collecting Personal Data

Data is collected fairly and transparently, with clear purposes and lawful bases. Consent is obtained where required, and data subjects are informed of their rights.

8. Using Personal Data

Personal data is used only for the purposes for which it was collected. It is not shared with third parties without a lawful basis or the data subject's consent.

9. Data Sharing and Third Parties

Data may be shared with:

- Awarding bodies
- Regulatory authorities
- Service providers under contract
- Emergency services (where necessary)

All third-party processors must comply with UK GDPR and have appropriate data protection agreements in place.

10. Data Security and Storage

- Data is stored securely using appropriate technical and organisational measures.
- Access is restricted to authorised personnel.
- Regular audits and risk assessments are conducted.

11. Data Retention and Disposal

Data is retained only as long as necessary and disposed of securely in accordance with the College's Data Retention Schedule.

12. Rights of Data Subjects

Data subjects have the right to:

- Access their data
- Rectify inaccurate data
- Erase data (right to be forgotten)
- Restrict processing
- Data portability
- Object to processing
- Not be subject to automated decision-making

13. Subject Access Requests (SARs)

Requests must be submitted in writing. The College will respond within one month, unless the request is complex.

14. Data Breaches

All data breaches must be reported immediately to the DPO. Serious breaches will be reported to the ICO within 72 hours.

15. CCTV and Photography

CCTV is used for security purposes and operates in accordance with the ICO's Code of Practice. Consent is obtained for photography and video recording where required.

16. Training and Awareness

All staff receive regular training on data protection responsibilities. Awareness campaigns are conducted to reinforce best practices.

17. Monitoring and Review

This policy is reviewed annually or in response to legislative changes. The DPO is responsible for ensuring the policy remains up to date.

18. Related Policies

- IT and Data Security Policy
- Safeguarding Policy
- Assessment Policy
- Complaints Policy
- Malpractice & Maladministration Policy

19. Contact Information

For questions or concerns regarding data protection, contact:

Phoenix College

Email: info@pskills.co.uk

Phone: +44 (0)20 8960 3719

Review Date: September 2025

Next Review Date: October 2027