



Data Protection Policy

1. Introduction

London School of Business and Social Sciences handles a large amount of personal data, and we take data privacy very seriously. By not handling personal data properly, we could put students, staff and other individuals affiliated with the School at risk.

There are also legal, financial and reputational risks for the College. For example:

- Reputational damage from a breach may affect public confidence in our ability to handle personal information.
- The processing of personal data underpins almost everything we do: without it, students cannot be admitted or taught; staff cannot be recruited; living individuals cannot be researched; and events cannot be organised for alumni or visitors. We have a duty to ensure that people continue to trust us with their data.
- We reserve the right to make changes to this policy at any time. Where appropriate, we will notify data subjects of these changes by mail or email.

2. Purpose

This policy provides a framework for ensuring that the School meets its obligations of the government of Sri Lanka.

3. Scope

This policy applies to all processing of personal data carried out for a School purpose, irrespective of whether the data is processed on non-school equipment or by third parties. This includes any individual acting as an officer or agent of the School in any capacity.

4. Definitions

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

More stringent conditions apply to the processing of special categories of personal data, which cover personal data revealing racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership; and the processing of genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health, or data concerning an individual's sex life or sexual orientation.

Data subjects include all living individuals who can be identified from personal data that we hold. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

5. Aims and commitment

Gatwick College, handles the personal data of a variety of individuals and takes seriously its responsibilities under data privacy legislation. It recognises that the mishandling of an individual's personal data may cause them distress or put them at risk of identity fraud. As a result it is committed to:

- Protecting the privacy and security of personal data

- Complying fully with data privacy legislation
- Handling an individual's personal data in a careful and considerate manner that recognizes the importance of such information to their privacy and welfare.

The School seeks to achieve these aims by:

- Appointing a Data Protection Officer (DPO) to have oversight of Data Protection within School and monitor compliance with Data Protection Procedures.
- Ensuring that staff and other individuals who process data for School purposes are made aware of their individual responsibilities under data privacy legislation.
- Providing suitable training, guidance and advice.
- Incorporating the concept of 'privacy by design' into administrative processes where they involve the processing of personal data: for example, by processing the least quantity of personal data consistent with the needs of the process
- Operating a centrally coordinated procedure for the processing of subject access and other rights-based requests made by individuals.
- Investigating promptly any suspected breach of data privacy legislation; reporting it, where necessary, to the ICO; and seeking to learn any lessons from the incident in order to reduce the risk of reoccurrence.

6. Data Protection Principles

All processing of personal data must be conducted in accordance with the data protection principles. Gatwick College's policies and procedures are designed to ensure compliance with the principles.

In summary, the principles require that personal data is:

1. processed fairly, lawfully and in a transparent manner ['lawfulness, fairness and transparency']

2. used only for limited, specified stated purposes and not used or disclosed in any way incompatible it those purposes ['purpose limitation']
3. adequate, relevant and limited to what is necessary ['data minimization']
4. accurate and, where necessary, up-to-date ['accuracy']
5. not kept for longer than necessary ['storage limitation']
6. kept safe and secure ['integrity and confidentiality']

In addition, a new accountability principle requires us to be able to evidence compliance with these principles.

In order to comply with the data protection principles:

- London School of Business and Social Sciences has published Privacy Notices and Records of Processing Activities (ROPAs), available online at school website. Links to these official Privacy Notices should be included whenever the School collects personal data.
- Data obtained for specified purposes must not be used for a purpose that differs from those formally listed in the College's privacy notices and ROPAs.
- The Data Protection Officer will ensure that, on an annual basis, all data collection methods are reviewed to ensure that collected data continues to be adequate, relevant, and not excessive.
- Personal data will be retained in line with the Records of Processing Activities (ROPA). Once its retention date is passed, it must be securely destroyed or archived as set out in the ROPAs. Note that London School of Business and Social Sciences may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.



- To ensure that data is kept safe and secure, London School of Business and Social Sciences has Information Security Policies available at school website.
- The School will ensure that relevant staff are trained in the importance of collecting accurate data and maintaining it.
- Whenever we use a processor to handle personal data on our behalf, we will put in place a written contract that sets out each party's responsibilities and liabilities.

7. Data Subject Rights

Data Subjects have a number of rights including the right to erasure. Data is stored only for as long as is necessary. For details of the College's data retention periods please refer to the Records of Processing Activities available at: [website](#). If any data subject wishes to exercise their right to erasure, they should contact the Data Protection Officer. Any request for erasure can be made verbally or in writing.