



Data Protection Policy (GDPR)

1.Introduction

Ace London School obtains, uses, stores and otherwise processes personal data relating to potential staff and students (applicants), current staff and students, former staff and students, current and former workers, contractors, website users and contacts, collectively referred to in this policy as data subjects. When processing personal data, the School is obliged to fulfill individuals' reasonable expectations of privacy by complying with relevant data protection legislation ('data protection law').

Personal data is recorded information that relates to a living person that can be associated with that person, either from other information in the possession of the organisation holding the data or by cross referencing to information held by a third party. This includes expressions of opinion about the individual and indication of any intentions of the Data Controller or any other person in regard to the individual. Recorded information can be stored electronically or in a manual filing system.

Examples of Personal Data include:

- ☐ Name, home and work addresses
- ☐ Date of Birth
- ☐ National insurance and passport numbers
- ☐ Bank account or credit card details
- ☐ Insurance policy details
- ☐ Employment records
- ☐ Education history
- ☐ Images caught on close circuit television (CCTV)
- ☐ Student record information
- ☐ Student exam results

To comply with the law, such personal data must be



collected and used fairly, stored safely and not disclosed to any other person unlawfully. The principles to ensure that personal data is processed properly, and which the School follow to ensure it complies with the legislation, are set out in the General Data Protection Regulations (the GDPR), available on the Information Commissioner's Office website (<https://ico.org.uk/>).

Under the GDPR, personal data shall:

be processed fairly and lawfully

be obtained for a stated purpose(s) and not processed for anything other than the stated purpose(s) and for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes

be adequate, relevant and not excessive for the purpose for which it was obtained

be accurate and be kept up to date, and if inaccurate be rectified or erased without delay

except where anonymised so that the individual cannot be identified, shall not be kept for longer than is necessary for the purpose for which it was obtained

processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

ACE LONDON SCHOOL will ensure that these principles are always followed. Therefore, through appropriate management and strict application of criteria and controls, ACE LONDON SCHOOL will process data only as set out in



this policy and the ACE LONDON SCHOOL Privacy Notice.

2. Your rights

UK Data Protection law secures the following rights provides for individuals:

- ☐ The right to be informed
- ☐ The right of access
- ☐ The right to rectification
- ☐ The right to erasure
- ☐ The right to restrict processing
- ☐ The right to data portability
- ☐ The right to object
- ☐ Rights in relation to automated decision making and profiling.

Further information on how these rights can be found here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

3. How we use your data

ACE LONDON SCHOOL may use and process personal data (including Special Category data and criminal offence data) both during and after individuals have worked or studies at the School. Special Category data includes information held by ACE LONDON SCHOOL as to your physical or mental health or condition, your racial/ethnic origin, sexual orientation/sex -life, political views, or religion. Criminal offence data includes information on the commission or alleged commission of any offence by you and any proceedings for an offence committed or alleged to have been committed by you (including the outcome or sentence in such proceedings).

We may obtain the following categories of personal data from third-



parties:-

- ☐ Identifying data *e.g. usernames, names, email addresses*
- ☐ Tracking data *e.g. attendance records taken by contractor lecturers*
- ☐ Financial data *e.g. payment and student finance data collected by contractor finance staff*
- ☐ Medical and health information *e.g. sick notes*
- ☐ Professional information *e.g. employer or past academic references, academic record information for admissions purposes*

ACE LONDON SCHOOL processes your data, including Special Category Data for the purposes and in the manner set out in its Privacy Notice. The processing of your personal data for the below purposes is required for the performance of this contract between you and ACE LONDON SCHOOL, for ACE LONDON SCHOOL to meet its regulatory obligations to the Ofqual, and for ACE LONDON SCHOOL's legitimate interests including marketing, quality assurance, and ensuring safety and security of staff and students. We may also ask for your consent for participation in some marketing activities (e.g. subscribing to marketing information along with our newsletter). If so, you have the right to withdraw such consent at any time.

The purposes for which ACE LONDON SCHOOL may process your personal data (including Special Category data) include:

- ☐ the administration of your enrolment on and participation on a course, including the administration of examinations, the issue of results and certificates in connection with the course and (where applicable) the provision to your



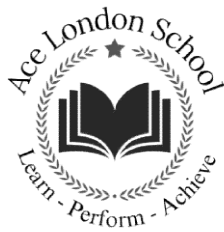
employer or other sponsor/corporate sponsor information about your attendance and performance on a course;

- ☐ the provision of ACE LONDON SCHOOL services and facilities to you and the protection of your health, safety and welfare whilst at ACE LONDON SCHOOL;
- ☐ the issue and operation of ACE LONDON SCHOOL's ID card in accordance with the conditions of the Student enrolment terms and conditions;
- ☐ the collection of tuition fees and other ACE LONDON SCHOOL fees;
- ☐ equal opportunities monitoring;
- ☐ arrangement and marketing of alumni activities;
- ☐ the provision of references about you;
- ☐ the provision of information to any regulator, government body or agency;
- ☐ for safety purposes; and
- ☐ the provision of information to the Higher Education Statistics Agency (HESA)

Your HESA information including linked data is used for four broad purposes: public functions, administrative uses, HESA publications and Equal opportunity, research, journalism and other processing in which there is a legitimate interest. For more information see the HESA Collection Notice on <http://www.hesa.ac.uk/fpn>

In some circumstances, it may be necessary for ACE LONDON SCHOOL to transfer your personal data to a country outside the European Economic Area (for example, if that is your country of origin). Such a transfer will only be made for the purposes specified above.

You should be aware that countries outside the EEA may



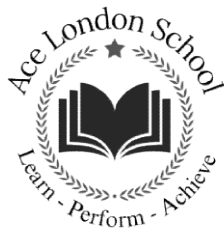
not offer data protection law equivalent to that applicable in the United Kingdom and you consent to the transfer of data in these circumstances and for those purposes. Where we make such a transfer to a country that does not provide the same level of data protection as the UK, we will put appropriate measures in place to ensure your information is protected.

In some circumstances your personal data will be processed by a third party on our behalf – e.g. a work placement provider, a student recruitment agency, or contractor lecturing or administrative staff. Any such processing will only be done under a GDPR compliant processor contract requiring the third-party to only process the data in accordance with our written instructions.

Your data will be received by the following categories of third-party recipients:

- ☐ awarding bodies
- ☐ regulators and funding agencies
- ☐ debt recovery agencies instructed to recover outstanding fees
- ☐ contractor staff
- ☐ partner course and skill providers e.g. Careers Group, Learn Direct, Trainimaster
- ☐ professional advisors e.g. our accountants, solicitors, quality assurance consultants, our DPO
- ☐ public authorities and law enforcement e.g. HESA, the police, UKVI re your information is protected.

ACE LONDON SCHOOL may make video and/or audio recordings of face-to-face and online lectures for training and quality monitoring purposes, which may include students' contributions to classroom discussions and



expressions of opinion. These recordings may also be used by the School for investigating suspected instances of misconduct or breaches of security.

Further to 3.11., in some circumstances, ACE LONDON SCHOOL may wish to use data in the form of photographs, or video or audio recording, of classroom situations as part of general marketing materials for example in ACE LONDON SCHOOL's annual report, prospectus or course materials. Video and audio recordings and any personal data alongside them will only be used in this way with your explicit consent, which you have the right to withdraw at any time.

If ACE LONDON SCHOOL does not process your data fairly, you may lodge a complaint with the Information Commissioners Office (ICO) here: <https://ico.org.uk/concerns/handling/> within 3 months of your last contact concerning the matter with ACE LONDON SCHOOL (or such other time limit as the ICO from time to time specify).

4. Confidentiality

All information given to the School staff will be treated with sensitivity, care and discretion. In most circumstances, the information students provide is treated as confidential, but members of staff may discuss aspects of student enquiry or circumstances with their immediate colleagues or in a few cases where relevant, with the School management. If such discussions take place it will usually be for the sole purpose of seeking information, confirming the best course of action, or helping the member of staff to reflect on their work with you. Whenever possible, any such discussion between School staff will take place without identification of student personally.

5. Staff responsibilities

Staff whose work involves the use of personal data are responsible for ensuring that:

- ☐ any personal data which they hold whether electronically or in hard copy is kept securely, including using password protection on computer files,
- ☐ personal data is not disclosed by them either orally or in writing, to any unauthorised third party,
- ☐ the personal data is accurate and kept up to date, held for the appropriate length of time and destroyed confidentially when/if no longer needed, and
- ☐ they do not access any personal data which is not necessary for carrying out their work.
- ☐ report any data breach to the DPO within 48 hours where feasible, to allow to the School to comply with its obligation to record all data breaches, and to report a data breach to the ICO within 72 hours.

Managers have an additional responsibility to ensure that their staff are aware of the data protection principles and know how to correctly process personal and sensitive personal data as part of their work.

6. Student responsibilities

It is student's responsibility to inform ACE LONDON SCHOOL if their personal details require updating. We will provide an annual opportunity for a student to check their data through the registration process.

We also collect, at registration, the contact details of a person nominated by student for emergency contact



purposes. A student must notify them that we are holding this data which will only be used in an emergency.

7. **Students with disabilities or dyslexia**

If a student has declared a disability or dyslexia, the School is legally required under the Equality Act 2010 to make appropriate and reasonable adjustments in order to help such student to participate to the fullest extent possible in the educational opportunities provided by the School. Information about the student situation and requirements will be limited to that necessary to assure that appropriate adjustments can be made to help the student gain maximum benefit from their course of study. Any information will normally only be passed to others with student's agreement.

8. **Subject Access Requests**

Student is entitled to request a copy of the data we hold about him/her. Any person who wishes to exercise this right should complete the '*Subject Access Request*' form available from the Student Portal and submit it to the Registry, however a request can be made verbally or through any medium to any member of staff at ACE LONDON SCHOOL.

ACE LONDON SCHOOL will comply with requests for access to personal data as quickly as possible but will ensure that it is provided within 28 calendar days of receipt of the request. ACE LONDON SCHOOL can extend the time to respond by a further two months if the request is complex or it has received a number of requests from the student. ACE LONDON SCHOOL will inform the student within 1 month of receiving their request and explain why the extension is necessary.

Requests made for exam results through a Subject Access Request prior to the publication date for the results, or

clearly intended to compel release of the transcript of certificates themselves (for example where these have been withheld for failure to pay fees), the request will be treated as manifestly unfounded and will be refused. ACE LONDON SCHOOL will inform the student why where this is the case.

9. Retention of records

Application data will be retained for 6 months from the date of the application if enrolment is not successful. We will retain a full student record for 6 years after a student has left ACE LONDON SCHOOL so that we can fulfil a duty to provide details of your education and references when asked to do so. After this time, we will keep enough data about a student to be able to confirm the qualifications achieved whilst at ACE LONDON SCHOOL.

10. Key contact details

- *Ace London School Ltd (Data Controller)*

Olympic house
28-42 Clements Road,
Ilford IG1. 1BA.

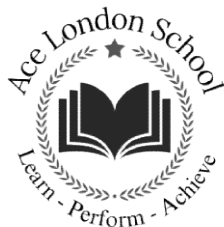
info@acelondonschool.co.uk

- *ACE LONDON SCHOOL Registry (for students' data Subject Access Requests)*

info@acelondonschool.co.uk

Appendix A: Subject Access Request Form

Subject Access Request (Page 1)



Purpose of this form:

It is not mandatory to use this form, but it will help us to give a timely and accurate response to your subject access request as required in the General Data Protection Regulation.

Please complete the table below and return the form by post to Ace London School, Suite 302 & 315 Olympic House, 28-42 Clements Road, Ilford, IG1 1BA, United Kingdom marked for the attention of Registry: info@acelondonschool.co.uk (if you are a student), or HR: info@acelondonschool.co.uk (if you are an employee of the School or a contractor).

About you

Title	
Forename(s)	
Surname	
Other names we may know you by	
Any reference numbers or information that will help us locate the information we hold on you	

How may we contact you? (Provide at least one way)

Telephone	
Email address	
Postal address	

Proving your identity

We are required to try and verify that you are the person named



above. We may ask for one of the following documents – Please tick the ones you could supply:

- A copy of your passport
- A copy of your driving licence
- A copy of a recognised photo ID
- An original utility bill issued in your name

Subject Access Request (Page 2)

Your request

Please outline the information to which you wish us to provide access:

(Guidance on Making a Subject Access Request)

What are your rights?

The Data Protection Act 2018 gives individuals a right of access to the personal data which organizations hold about them, subject to certain exemptions (see 2. below). Requests for access to personal data are known as Subject Access Requests. This guidance explains process as how to submit a subject access request to ACE LONDON SCHOOL, how ACE LONDON SCHOOL will handle request, and right to complain if dissatisfied.

If a SAR request is made to ACE LONDON SCHOOL, individuals are an entitled to be told whether ACE LONDON SCHOOL hold any data about them. If ACE LONDON SCHOOL does, the staff member has a right:

1. To be given a description of the data, the purposes for which the data are being processed, and those to whom

the data may have been disclosed;

2. To be given a copy of the data in an intelligible form, with any unintelligible terms explained;
3. To be provided with any information available to ACE LONDON SCHOOL about the source of the data; and
4. If staff member specifically request it, to be given an explanation as to how any automated decisions taken about them has been made. These rights apply to electronic data, and to data in "manual" (i.e. non-electronic) formats, subject to certain limitations in regard to unstructured manual data (see 3. below). Further information about staff rights under the Data Protection Act is available on the website of the Information Commissioner (www.ico.gov.uk).

What are the exemptions?

The Data Protection Act includes various exemptions which specify the circumstances in which an organization can refuse to provide access to personal data. The most likely situations in which ACE LONDON SCHOOL could lawfully refuse a subject access request are where:

The release of the data would jeopardise the prevention or detection of crime, or the apprehension or prosecution of offenders;

- You have requested access to an examination script, other than examiners' comments;
- You have requested data contained in a confidential reference provided by ACE LONDON SCHOOL;
- Staff member requested data which record ACE LONDON SCHOOL's intentions in relation to any negotiations with that staff member, and the release of the data would prejudice the negotiations;
- The data is covered by legal professional privilege.

If ACE LONDON SCHOOL withholds data from staff member or anyone as a result of an exemption under the Data Protection Act, ACE LONDON SCHOOL will explain why the



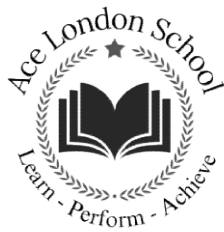
data have been withheld and the relevant exemption, unless doing so would itself disclose information which would be subject to the exemption.

The Data Protection Act allows ACE LONDON SCHOOL to refuse to provide staff member or anyone with a copy of staff member data if the effort in doing so would be disproportionate, or if the same or similar data have already been provided to them or their associates or anyone in context to the staff member and a reasonable interval has not elapsed since staff member or anyone on their staff member's behalf to previous subject access request. In addition, if ACE LONDON SCHOOL reasonably requires further information from a staff member in order to locate the data which the staff member had requested, and ACE LONDON SCHOOL has informed staff member or their representatives of this, ACE LONDON SCHOOL does not required to comply with request until the staff member or their representative supply ACE LONDON SCHOOL with the information.

ACE LONDON SCHOOL has to protect the Data Protection rights and other legal rights of other individuals when responding to subject access requests. Information which does not relate to a staff member may be 'blanked out' or edited out, particularly if it relates to other individuals. Sometimes ACE LONDON SCHOOL may not be able to release data relating to staff member or their representatives because doing so would also reveal information about other persons who have not consented to their data being released, and it would not be reasonable in the circumstances to release the data without their consent. In such cases, staff member or their representatives will be informed that data about the staff member has been withheld and the reasons for doing so.

What happens after the request is received?

ACE LONDON SCHOOL will send an acknowledgement of request as soon as possible. This will indicate the deadline by



when ACE LONDON SCHOOL will send a response. ACE LONDON SCHOOL may also ask to provide further information or clarification if ACE LONDON SCHOOL requires it to process request and may contact again for additional information or clarification if necessary. After the ACE LONDON SCHOOL receives request, ACE LONDON SCHOOL must consider it and respond to it. ACE LONDON SCHOOL will respond as soon as possible, and in all cases within 1 calendar month of receipt of the request. If ACE LONDON SCHOOL reasonably require further information to locate the data which has been requested, ACE LONDON SCHOOL will inform you as soon as possible, and the 30-day deadline will commence from the date when we receive the information from the staff member or their representatives. ACE LONDON SCHOOL will normally send the data electronically through a shared One Drive folder, unless ACE LONDON SCHOOL agree with staff member or their representatives that the data can be supplied in a different format.

The data may take the form of photocopies, printouts, transcripts or extracts, or a combination of these, depending on what is most appropriate in the circumstances. Although staff member or their representatives do not have a right to inspect original documents, ACE LONDON SCHOOL may offer this to staff member or their representatives where supplying staff member or their representatives with copies of the data would involve disproportionate effort.

If ACE LONDON SCHOOL holds no data about staff member, staff member or their representatives will be informed of this. Staff member or their representatives will also be informed of any cases where data about staff member has been withheld and the reasons for this, including the relevant exemptions (see above), unless doing so would itself reveal information which would be subject to an exemption.

Can I appeal?

You can ask for an internal review if ACE LONDON SCHOOL refuses your subject access request or you are dissatisfied with the handling of staff member request. Appeals should be sent in writing to the CEO:

The CEO will acknowledge appeal within seven working days, and will consult with the Data Protection Officer. A response will be sent to you within 28 calendar days of receipt of appeal. If it includes a decision that data should be released, the information will be provided as soon as possible. Staff or their representatives can also ask the Information Commissioner for an assessment as to whether ACE LONDON SCHOOL has processed data in accordance with the Data Protection Act. The Commissioner can be contacted at the following address:

Information Commissioner



Version Tracking:

Version	Author / revisions by	Changes summary	Approved by	Date
1.0 – 3.1	Data Protection Officer Legal Advisor Executive Committee	Original version and subsequent updates.	Executive Committee	Sep 2016 Sep 2017 May 2018 Sep 2018
3.2	Quality Manager Audit Legal Advisor	Factual updates: Change of data protection officer; Reviewed by the Publications Committee.	Board of Governors	May 2020

3.3	Quality Manager Audit Legal Advisor Head of Registry	Annual review and update. Addition of clause in recording lectures. Expanded definition of personal data. Addition of SAR form template	Board of Governors	October 2020
3.4	Quality Manager Counsel	New formatting and version control applied.	Board of Governors	October 2023

Date of next review: September 2025