

# **General Data Protection Regulation (GDPR) Policy**

#### **Ace London School**

## 1. Purpose

Ace London School is committed to protecting the privacy and security of all personal data it holds. This policy sets out how the school collects, processes, stores, and shares personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The policy ensures that all personal data is handled responsibly, transparently, and lawfully, protecting the rights and freedoms of staff, students, and other individuals associated with the school.

### 2. Scope

This policy applies to:

- All **employees**, **students**, **contractors**, **suppliers**, and **visitors** whose personal data is collected by the school.
- All **departments**, **systems**, and **processes** within Ace London School that handle personal data, whether electronic or paper-based.
- All staff members and third parties who process personal data on behalf of the school.

### 3. Definitions

- **Personal Data:** Any information that can identify a living individual (e.g., name, address, ID number, student number, email address).
- **Special Category Data:** Sensitive personal information such as racial or ethnic origin, health, religious beliefs, or sexual orientation.
- **Processing:** Any operation performed on personal data, including collection, recording, storage, retrieval, or destruction.
- Data Subject: The individual to whom the personal data relates.











- **Data Controller:** The organisation (Ace London School) that determines the purpose and means of processing personal data.
- Data Processor: A person or organisation that processes data on behalf of the controller.
- **Data Protection Officer (DPO):** The person responsible for overseeing data protection compliance and ensuring adherence to this policy.

### 4. Data Protection Principles

Ace London School adheres to the seven key principles of data protection under UK GDPR:

## 1. Lawfulness, Fairness, and Transparency

a. Data must be processed lawfully and openly, and individuals must be informed about how their data is used.

### 2. Purpose Limitation

a. Data must be collected for specified, explicit, and legitimate purposes only.

#### 3. Data Minimisation

a. Only data necessary for the stated purpose should be collected.

#### 4. Accuracy

a. Data must be accurate and kept up to date.

# 5. Storage Limitation

a. Data should not be kept longer than necessary for its purpose.

### 6. Integrity and Confidentiality (Security)

a. Data must be processed securely to protect against unauthorised access, loss, or damage.

## 7. Accountability

a. The school must be able to demonstrate compliance with all data protection principles.

## 5. Legal Basis for Processing Data

The school will process personal data only where one or more of the following legal bases apply:

- Consent of the data subject
- Performance of a contract (e.g., student enrolment, staff employment)
- Compliance with a legal obligation
- Protection of vital interests (e.g., health and safety emergencies)
- Performance of a task carried out in the public interest or under official authority
- Legitimate interests pursued by the school or a third party











# 6. Categories of Personal Data Processed

Ace London School may collect and process the following types of data:

- **Students:** Name, contact details, academic records, attendance, financial details, health and support needs.
- **Staff:** Employment details, payroll, qualifications, performance reviews, absence, next of kin
- Visitors and Contractors: Identification, company information, purpose of visit.
- Marketing and Communications: Contact preferences, consent for promotional use.

Special category data (e.g., medical or equality data) will only be processed with explicit consent or where legally required.

#### 7. Data Collection and Use

Data will only be collected for specific purposes, such as:

- Student admissions and administration
- Academic delivery and assessment
- Safeguarding and welfare
- Staff recruitment and payroll
- Legal and regulatory compliance
- Communication and marketing activities

# 8. Data Storage and Security

- All personal data will be stored securely in systems protected by access controls, passwords, and encryption where appropriate.
- Physical records will be kept in locked filing cabinets within secure premises.
- Staff must ensure that personal data is not left unattended on desks, printers, or screens.
- Regular data backups will be performed, and cybersecurity measures maintained to prevent breaches.













## 9. Data Sharing and Disclosure

Personal data will only be shared where necessary and lawful, such as with:

- Government departments (e.g., UKVI, HMRC, ASIC, Awarding Bodies)
- Partner institutions and regulatory agencies
- Third-party service providers under contractual agreements
- Emergency services in urgent circumstances

All third-party data processors must comply with UK GDPR requirements and sign a Data Processing Agreement (DPA).

#### 10. Data Retention

The school will retain personal data only for as long as necessary to fulfil its purpose or meet legal obligations.

Retention periods are set out in the **school's Data Retention Schedule**. Once no longer required, data will be securely deleted, shredded, or anonymised.

# 11. Rights of Data Subjects

Under UK GDPR, individuals have the following rights:

- 1. **Right to be informed** to know how their data is collected and used.
- 2. **Right of access** to request copies of their personal data.
- 3. **Right to rectification** to correct inaccurate or incomplete data.
- 4. Right to erasure to request deletion of personal data (where legally permissible).
- 5. **Right to restrict processing** to limit how their data is used.
- 6. Right to data portability to obtain and reuse personal data across services.
- 7. Right to object to data processing based on legitimate interests or direct marketing.

Requests to exercise these rights should be made in writing to the **Data Protection Officer** (**DPO**).

#### 12. Data Breach Procedure

In the event of a data breach (loss, theft, unauthorised access, or disclosure):













- The breach must be reported immediately to the DPO.
- The DPO will investigate and, where necessary, report to the **Information** Commissioner's Office (ICO) within 72 hours.
- Affected individuals will be notified if their rights or freedoms are at risk.
- Corrective and preventive measures will be implemented to avoid recurrence.

## 13. Staff Responsibilities

### All staff must:

- Complete GDPR and data protection training.
- Follow school policies and procedures on handling data.
- Ensure data is collected, stored, and shared securely.
- Report suspected data breaches or concerns immediately.

# 14. Data Protection Officer (DPO)

The DPO is responsible for overseeing GDPR compliance, providing advice, monitoring data protection activities, and liaising with the ICO.

Data Protection Officer (DPO) - Muhammad Sajid

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