



Data Protection Policy

1. Introduction

- 1.1 Moorlands College (“we”, “us”) is a charitable company registered at Companies House with company number 4241702 and registered with the Charity Commission for England and Wales with charity number 1092000. We are registered with the Information Commissioner’s Office (ICO) with registration number Z6065769.
- 1.2 This Data Protection Policy explains how we, as staff of Moorlands College, intend to comply with the UK General Data Protection Regulation (UK GDPR) and is issued in the interest of demonstrating how we operate within the UK GDPR boundaries.
- 1.3 We value everyone who engages with us by whatever means, and we are obliged to do all we can to fully protect privacy and to make sure the personal data we obtain is kept safe.
- 1.4 Any questions regarding data protection, or privacy, should be directed to the Data Protection team, whose contact information can be found at the bottom of this document.

2. Key definitions

- 2.1 Data controllers instigate processing activities. Controllers make decisions to purposefully collect and process data, decide why it necessary to be collected, and are responsible for the impact on data subjects as a result of the processing activities. Regarding the activities of the College, ***Moorlands College is the data controller.***
- 2.2 Data processors process data on behalf of a data controller. Processors do not decide to collect data, what data is necessary, or how it is processed. They do not decide to disclose data, how long to retain the data, and are not responsible for organisational measures that affect the data processing. Regarding the activities of the College, ***data processors are all who process personal data on behalf of Moorlands.***
- 2.3 Data subjects are individuals that can be identified by the data that is collected. Regarding the activities of the College, ***data subjects include but are not restricted to staff, students, applicants and attendees of College events.***
- 2.4 Personal data includes any information that can be used to identify an individual data subject.
- 2.5 Special category data is personal data of a more sensitive nature. Processing special category data requires a lawful basis in order to be processed. Special category data commonly processed at Moorlands College are racial or ethnic origin, religious or philosophical beliefs, health, and sexual orientation.

3. Scope

- 3.1 This policy applies to:

- data processors who act on behalf of the College
- data subjects of Moorlands College including, but not limited to, students, staff, graduates, supporters, donors, trustees, and individual and organisational partners
- personal data retained in any format, whether it is stored electronically or using manual systems
- personal data that is stored on site at the Christchurch Campus, at Regional Centres, on College devices, and that which is kept off site.

3.2 This policy is augmented by our Privacy Notice,¹ and further detail is in our Privacy Procedure information.

4. Data protection principles

4.1 Moorlands College is committed to complying with data protection principles as detailed in the UK GDPR. These principles state that all personal data should be:

- processed lawfully, fairly and transparently
- collected only for specified and legitimate purposes
- minimised to only what is relevant and necessary
- accurate, and updated to maintain accuracy where possible
- retained in a manner which identifies a data subject only for a necessary period of time that is fit for the purpose of which it was collected, after which it will be destroyed or deleted
- stored and processed in an appropriately secure manner.

4.2 Accountability is also key to compliance with the Data Protection legislation, and the Data Controller is responsible for demonstrating that we are accountable to data subjects and the ICO.

5. Data subject rights

5.1 We endeavour to ensure the rights of data subjects are met at all times. There are eight data subject rights:

- 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.

5.2 We recognise that under Data Protection Regulation legislation, data subjects have the ability to exercise these rights at any time providing this does not breach any contract which we have entered into with the data subject.

5.3 When a subject access request is recognised, the Data Protection Team must be informed. They will deal with the request within one month, and this time-frame will be communicated to the data subject.

¹ <https://www.moorlands.ac.uk/wp-content/uploads/2021/03/UK-GDPR-Privacy-Notice-Dec20.pdf>

6. Roles and responsibilities

- 6.1 Moorlands College has a responsibility as a data controller for:
- complying with Data Protection legislation and being accountable for this
 - working alongside and cooperating with the ICO as the UK regulator of Data Protection
 - responding to actions issued by the ICO
 - providing UK GDPR training through our e-learning staff training provider, and raises awareness among staff to ensure good practice in adhering to the UK GDPR
 - demonstrating our accountability through various documentation that can be provided to the ICO if necessary.
- 6.2 Data processors will process personal data on behalf of Moorlands College and abide by this policy:
- as needed to conduct and facilitate necessary procedures,
 - by engaging with training as provided, and
 - communicating any arising queries to the Data Protection team.
- 6.3 Our Data Protection team works to:
- monitor our compliance with the UK GDPR by overseeing the data collection and processing activities at Moorlands College, raising awareness and promoting compliant systems and behaviours within the College
 - act as a point of contact between the College and the ICO
 - providing advice to staff and data subjects by being available for queries
 - take action on access requests when necessary.
- 6.4 The Data Protection team can be contacted using the details below:
dataprotection@moorlands.ac.uk

7. Document history

6 July 2020	Approved by Academic Board
2 March 2021	Approved by Director of Academic Quality: Change to 'UK GDPR' and amendment to contact email address.