

## General Data Protection Policy

<b>Policy Number:</b>	ICCS-GDPR-V1-2025
<b>Policy Owner:</b>	Head of Quality Assurance
<b>Approved By:</b>	Senior Leadership Team
<b>Approval Date:</b>	November 2025
<b>Next Review Date:</b>	January 2027
<b>Email:</b>	info@iccs.uk

### Content:

- Introduction and Commitment
- Policy Statement, Scope and Applicability
- Governance, Roles, and Responsibilities
- Legal Framework
- Data Protection Principles and Accountability
- Lawful Bases and Special Category Conditions
- Transparency and Privacy Notices
- Data Subject Rights and Requests
- Information Security and Asset Management
- Data Sharing, Processing, and Publication
- Monitoring, Audit and Assurance
- Data Protection Impact Assessments and Privacy
- Records Management, Storage and Retention
- Training and Awareness
- Incident and Breach Management
- Policy Review

### Appendices:

- Definitions
- References

## Introduction

The International College of Contemporary Sciences (ICCS) provides education and professional learning in a secure and ethical environment. ICCS is committed to protecting the privacy and confidentiality of personal data across the College Community, which includes students, staff, governors, parents or guardians, volunteers, visitors, partners, and contractors. This policy explains how ICCS complies with the United Kingdom General Data Protection Regulation and the Data Protection Act and how the College protects the rights and freedoms of individuals. The College's vision is to be the learning destination of choice, underpinned by respect, integrity, accountability, and innovation.

## Policy Statement, Scope and Applicability:

This policy applies to all staff, students, visitors, contractors, suppliers, volunteers, and partners. It covers all personal data and special category data processed by ICCS, whether on paper or in electronic systems, including data processed on ICCS's behalf by third parties. The Data Protection Officer oversees day to day compliance, maintains liaison with the Information Commissioner's Office, and coordinates responses to requests from data subjects.

## Governance, Roles, and Responsibilities:

Data Protection Officer promotes good data handling practices, ensure that mandatory training is completed, and maintain local records of processing activities. All staff and contractors keep personal data confidential and secure, ensure the accuracy of data provided to the College, and promptly escalate risks or incidents. ICCS is registered with the Information Commissioner's Office as a data controller and as a data processor and the registration is reviewed annually by the Data Protection Officer.

## Legal Framework

ICCS operates in compliance with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act, and the Privacy and Electronic Communications Regulations. The College's assurance, reporting, and quality monitoring arrangements are guided by sector regulations and best practice issued by the Information Commissioner's Office (ICO), the Office for Students (OfS), Ofqual, and the Department for Education (DfE). These frameworks ensure that ICCS upholds the highest standards of accountability, transparency, and data governance across all academic and administrative functions.



## Data Protection Principles and Accountability:

ICCS upholds the principles of lawful, fair, and transparent processing, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability. Compliance is demonstrated through policies and procedures, staff training and awareness, privacy by design and by default, technical and organisational measures, privacy notices, Data Protection Impact Assessments, breach management, and the appointment of a Data Protection Officer with appropriate independence and expertise.

## Lawful Bases and Special Category Conditions:

Personal data are processed only where a lawful basis applies, including contract, legal obligation, public task, legitimate interests, vital interests, and consent. Special category data require an additional condition, such as explicit consent, substantial public interest, employment and social security obligations, vital interests, or the establishment, exercise, or defence of legal claims. Marketing communications require positive opt in under the Privacy and Electronic Communications Regulations and individuals may withdraw consent at any time by contacting the Data Protection Officer. Images and recordings are processed on a relevant lawful basis and specific security, and retention arrangements apply to CCTV and to learning recordings.

## Transparency and Privacy Notices:

ICCS provides privacy notices for students, staff, partners, and visitors that explain data collected, purposes, lawful bases, sharing, retention, and contact routes for rights. Staff must direct all rights requests to the Data Protection Officer and must not disclose personal data without approval from the Data Protection Officer.

## Data Subject Rights and Requests:

ICCS facilitates the rights of access, rectification, erasure, restriction, portability, and objection, and the right to complain. Requests are forwarded to the Data Protection Officer within twenty-four hours together with all relevant information. ICCS responds within one calendar month unless an extension is permitted. Where feasible the College informs third parties of corrections or erasures where data have been shared. Individuals may complain to the Information Commissioner's Office in addition to contacting the Data Protection Officer at [dpo@iccs.uk](mailto:dpo@iccs.uk)

## Information Security and Asset Management:

ICCS applies appropriate technical and organisational measures that include access controls, encryption, strong authentication, secure configuration, malware protection, network security, privacy enhancing technologies, clear desk practices, and secure storage for paper records. Access is restricted to those with a legitimate need. Regular backups are maintained and tested. The College maintains a central Information Asset Register and a Retention Schedule and cooperates with audits and external assurance.

## Data Sharing, Processing, and Publication:

Personal data are not disclosed to unauthorised third parties, including family members and public bodies, without lawful authority or consent and approval from the Data Protection Officer. ICCS uses written contracts that meet United Kingdom GDPR Article 28 where a processor relationship exists and conducts proportionate due diligence, encouraging Cyber Essentials or equivalent certification. Information already in the public domain may be disclosed without consent in line with the Publication Scheme. The College may publish names of staff, job titles, work email addresses, and work contact numbers where appropriate. For awarding bodies and regulators, ICCS shares data strictly for defined purposes that include registration, assessment, quality assurance, certification, reasonable adjustments, malpractice investigations, centre monitoring, appeals, and statutory or regulatory reporting.

## Monitoring, Audit and Assurance:

ICCS undertakes proportionate monitoring and audit to verify compliance with this policy and with legal and regulatory requirements. The Data Protection Officer maintains compliance metrics, coordinates assurance reviews, and reports material findings to the Academic Board and the Board of Governors. External Quality Assurers, regulators, and awarding bodies may review samples of records on site or remotely and ICCS provides access in a controlled manner that preserves confidentiality.

## Data Protection Impact Assessments and Privacy:

A Data Protection Impact Assessment is required for new or changed processing that is likely to result in a high risk to individuals. The assessment describes the processing, assesses necessity and proportionality, evaluates risks, and defines mitigations. The Data Protection Officer maintains a register of assessments and authorises the assessment before processing begins. Automated decision making or profiling only occurs following an assessment and with safeguards that include the right to human review.

## Records Management, Storage and Retention:

Personal data are stored securely and retained only for as long as necessary for the purposes for which the data were collected. Retention periods are set out in the Records Management Policy and in the Information Asset Register, taking account of awarding body and regulatory requirements. At the end of the retention period data are securely deleted or destroyed using approved methods appropriate to the medium.

## Training and Awareness:

All staff complete mandatory data protection training at induction, with refresher training every three years. Staff with enhanced responsibilities receive additional role specific training. All relevant staff must also complete Home Office essential trainings, including Prevent Duty awareness and immigration compliance modules aligned to UKVI and right to work requirements.

## Incident and Breach Management:

The Data Protection Officer immediately informs all suspected or actual personal data breaches. ICCS assesses and contains the incident, records the breach in the register, notifies the Information Commissioner's Office within seventy two hours where required, and informs affected individuals where there is a high risk to their rights.

## Policy Review:

This policy is reviewed every year or sooner where legislation changes. Updated versions are approved by the Academic Board and published for the College Community.

## Definitions

**Breach:** A breach of security that leads to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data that are transmitted, stored, or otherwise processed. There may be reporting obligations to the Information Commissioner's Office and, where risk is likely, to affected individuals.

**College:** International College of Contemporary Sciences (ICCS).

**Consent:** A freely given, specific, informed, and unambiguous indication of the data subject's wishes signified by a clear affirmative action.

**Controller:** Any entity which, alone or jointly with others, determines the purposes and means of the processing of personal data. ICCS is a data controller for many of its activities.

**Data:** Any information relating to an identifiable person that is processed by automated means or forms part of a structured filing system.

**Data Protection Laws:** United Kingdom General Data Protection Regulation, the Data Protection Act 2018, and associated guidance and codes, including the Privacy and Electronic Communications Regulations.

**Data subject:** Any living individual who is the subject of personal data held by an organisation.

**Data Protection Impact Assessment:** A structured assessment of proposed processing to identify and minimise data protection risks.

**Data Protection Officer:** The College's appointed officer who is the first point of contact for data protection issues and requests to exercise rights.

**European Economic Area:** The European Union Member States together with Iceland, Liechtenstein, and Norway.

**Explicit consent:** Consent that is confirmed in a clear, specific statement for a particular purpose, used where required by law.

**United Kingdom GDPR:** The retained version of the General Data Protection Regulation as enacted and supplemented by the Data Protection Act 2018.

**Information Commissioner's Office:** The United Kingdom data protection regulator.

**Individual:** A living person who can be identified directly or indirectly from information held by the College, such as students, staff, parents or guardians, applicants, visitors, and alumni.

**Personal data:** Any information about an individual which identifies them or allows them to be identified, including names, addresses, email addresses, online identifiers, and information relating to characteristics or circumstances.

**Processing:** Any operation performed on personal data, including collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure, alignment, restriction, erasure, or destruction.

**Processor:** Any entity that processes personal data on behalf of a controller, typically under a contract that sets out documented instructions and required safeguards.

**Special category data:** Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for identification, health, or sex life or sexual orientation, together with criminal offence data which is subject to additional safeguards.

**Staff:** Any ICCS employee, worker, consultant, contractor, governor, volunteer, or temporary personnel who access the College's personal data.

**Student:** Any learner who has applied to, enrolled with, or is otherwise registered at ICCS, including those on interruption of studies, placement, or study abroad, and recent graduates for the period during which the College lawfully retains their data for academic, statutory, or alumni purposes.

**Third party:** A natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who are under the direct authority of the controller or processor and are authorised to process data.

## References:

- United Kingdom Data Protection Act 2018: <https://www.legislation.gov.uk/ukpga/2018/12/contents>
- The Privacy and Electronic Communications (EC Directive): <https://www.legislation.gov.uk/uksi/2003/2426/contents>
- Information Commissioner's Office GDPR Guidance: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>
- HESA's compliance with the GDPR: <https://www.hesa.ac.uk/about/regulation/data-protection>
- OfS regulatory conditions. <https://www.officeforstudents.org.uk/for-providers/registering-with-the-ofs/registration-with-the-ofs-a-guide/conditions-of-registration/>
- Ofqual General Conditions of Recognition: <https://www.gov.uk/guidance/ofqual-handbook>
- Department for Education Guidance: <https://www.gov.uk/government/organisations/department-for-education>