

Data Protection Policy

2025 - 26



Our Newham Learning & Skills
Part-time adult education

Policy owner: Head of Operations

Review date: 31 January 2026

Purpose

ONLS is fully committed to ensuring the confidentiality, integrity, and availability of all personal data it collects, processes, and stores. This policy outlines the responsibilities and procedures to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. ONLS aims to protect the rights and freedoms of all learners, staff, and stakeholders by safeguarding their personal information.

Scope of the policy

This policy applies to:

- a) All personal data collected, processed, or stored by ONLS, including learner records, staff records, and organisational data.
- b) All individuals who interact with ONLS, including staff, learners, contractors, and visitors.
- c) All forms of data processing, whether manual or automated, and across all locations where ONLS operates.

Key Principles

ONLS will adhere to the following key principles of data protection:

- 1. **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
- 2. **Purpose Limitation:** Data will only be collected for specified, explicit, and legitimate purposes and not further processed in a way incompatible with those purposes.
- 3. **Data Minimisation:** Only data that is relevant and limited to what is necessary for the intended purposes will be collected and processed.
- 4. **Accuracy:** ONLS will take all reasonable steps to ensure personal data is accurate and up to date.
- 5. **Storage Limitation:** Personal data will be retained only for as long as necessary for the purposes for which it was collected and processed.
- 6. **Integrity and Confidentiality:** Data will be processed in a manner ensuring its security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- 7. **Accountability:** ONLS will take responsibility for compliance with data protection principles and demonstrate this through appropriate documentation and procedures.

Learners' and Staff Rights

All learners and staff have the following rights regarding their personal data:

- 1. The right to be informed about how their data is collected, stored, and processed.
- 2. The right to access their personal data.

3. The right to rectification of inaccurate or incomplete data.
4. The right to erasure of data under specific conditions (the “right to be forgotten”).
5. The right to restrict processing of their data.
6. The right to data portability.
7. The right to object to data processing.
8. Rights regarding automated decision-making and profiling.

Responsibilities

ONLS Responsibilities:

- Ensure data protection compliance is embedded across all operations.
- Provide training to all staff on data protection policies and procedures.
- Maintain records of data processing activities.

Staff Responsibilities:

- Handle personal data in accordance with this policy and relevant training.
- Report any data breaches or concerns immediately to the Head of Operations (HO).

Head of Operations Responsibilities:

- Oversee compliance with data protection legislation.
- Act as a point of contact for data protection queries.
- Conduct regular data protection audits and impact assessments.

Data Security

ONLS will implement appropriate technical and organisational measures to safeguard personal data, including:

- Secure storage of physical records in locked facilities.
- Secure electronic records.
- Regular data backups and disaster recovery plans.
- Access controls to ensure data is only accessed by authorised personnel.

Data Breaches

All data breaches will be reported immediately to the HO. ONLS will:

- Assess the nature and extent of the breach.
- Contain the breach and mitigate risks.
- Notify the Information Commissioner’s Office (ICO) within 72 hours if required.
- Inform affected individuals when necessary.
- Document the breach and corrective actions taken.

Third-Party Data Sharing

ONLS may share data with third parties, such as awarding organisations, funding bodies, or government agencies, only when there is a lawful basis for doing so. Any third-party processors must demonstrate compliance with data protection laws.

Retention of Data

Personal data will be retained in accordance with ONLS's Data Retention Policy. Records will be securely deleted or anonymised when no longer required.

Monitoring and Review

This policy will be reviewed annually by the Head of Operations to ensure compliance with legislation and best practices.