CAMBRIDGE OPEN ACADEMY

Data Protection Policy

Approved by	Centre Manager
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Purpose

The purpose of this policy is to ensure that Cambridge Open Academy protects the personal data of learners, staff, and stakeholders in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy establishes the College's commitment to handling personal information responsibly, transparently, and securely.

Scope

This policy applies to all staff, contractors, and third parties who have access to personal data held by Cambridge Open Academy. It covers all personal data processed electronically or in paper format, including learner records, staff information, and partner data.

Policy Statement

Cambridge Open Academy is committed to safeguarding personal data and ensuring that it is processed lawfully, fairly, and transparently. The College ensures that:

- Personal data is collected for specific, explicit, and legitimate purposes.
- Only the minimum amount of data necessary is collected and processed.
- Data is accurate, up to date, and securely stored.
- Data is not kept longer than necessary.
- Data is processed in a manner that ensures appropriate security.

The College promotes a culture of data protection awareness and accountability across all departments.

Data Protection Principles

Cambridge Open Academy adheres to the seven key principles of the UK GDPR:

1. **Lawfulness, Fairness, and Transparency** – Data must be processed lawfully and individuals must be informed of how their data is used.
2. **Purpose Limitation** – Data must only be used for the purposes for which it was collected.
3. **Data Minimisation** – Only necessary data should be collected.
4. **Accuracy** – Data must be accurate and kept up to date.
5. **Storage Limitation** – Data must not be kept longer than required.
6. **Integrity and Confidentiality** – Data must be processed securely to protect against unauthorised access, loss, or damage.
7. **Accountability** – The College is responsible for demonstrating compliance with these principles.

Roles and Responsibilities

- **Data Protection Officer (DPO):** Oversees compliance with data protection laws, provides advice, and acts as the contact point for data subjects and the Information Commissioner's Office (ICO).
- **Centre Manager:** Ensures all staff follow this policy and implements appropriate controls for data management.
- **Staff and Contractors:** Must follow data protection procedures, complete data protection training, and report any breaches immediately.
- **Learners:** Are responsible for safeguarding their login credentials and personal information on online platforms.

Data Subject Rights

Under the UK GDPR, individuals have the right to:

- Access their personal data.
- Request correction of inaccurate data.
- Request deletion of personal data where applicable.
- Restrict or object to data processing.
- Request data portability.

Requests must be submitted in writing to the Data Protection Officer. The College will respond within one calendar month.

Data Security and Storage

Cambridge Open Academy implements technical and organisational measures to ensure the security of data. These include:

- Secure password-protected systems.
- Encrypted data storage.
- Restricted access to personal data based on role.
- Secure disposal of data and equipment.

Paper-based data is kept in locked cabinets accessible only to authorised personnel.

Data Breach Management

In the event of a personal data breach, staff must report it immediately to the Data Protection Officer. The DPO will assess the breach, take necessary remedial actions, and, where required, notify the ICO within 72 hours. Affected individuals will also be informed where there is a high risk to their rights and freedoms.

Third-Party Data Processing
Where external providers process data on behalf of Cambridge Open Academy (e.g., learning management systems, awarding bodies), contracts are in place to ensure compliance with data protection requirements. These third parties must guarantee the confidentiality and security of all personal data.

Training and Awareness
All staff and contractors must complete mandatory data protection training as part of induction and refresher programmes. Regular updates and workshops will be held to reinforce awareness of data protection responsibilities.

Monitoring and Review
This policy will be reviewed annually or sooner if changes occur in legislation or College operations. Continuous monitoring of data protection practices ensures that Cambridge Open Academy maintains full compliance with UK GDPR and best practices.