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Data Protection Policy

Academic Year 2025–2026

Version	1.0
Date approved	14/09/2025
Approved by	Senior Management
Next review date	05/08/2026

Introduction

London School of Management and Media Limited (LSMM) is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal information.

The LSMM collects and processes personal data relating to applicants, learners, employees, contractors, governors, alumni and other individuals who come into contact with the institution. This information is obtained for specified and lawful purposes including recruitment, enrolment, attendance, assessment, certification, safeguarding, personnel administration, payroll, quality assurance, regulatory compliance, and communication.

Personal data may be recorded in electronic systems, paper files, CCTV recordings, emails, learning platforms or other formats. The LSMM ensures that all personal information is:

- Obtained fairly and lawfully
- Processed transparently
- Used only for legitimate purposes
- Kept secure and confidential
- Retained only for as long as necessary

The LSMM regards lawful and correct treatment of personal information as a priority and complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Relevant guidance issued by the Information Commissioner's Office
- Regulatory expectations of the Office for Students (where applicable)

Scope

This policy applies to:

- All staff (permanent, temporary, visiting, and agency)
- Governors and senior management
- Consultants and contractors
- Learners
- Volunteers

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This policy does not form part of the employee or learner contract. However, compliance with this policy is a condition of employment and enrolment. Any failure to comply will be addressed in accordance with the LSMM's disciplinary procedures. All data subjects are entitled to:

- Know what information the LSMM holds about them and why
- Know how to gain access to it
- Request corrections where data is inaccurate
- Understand how the LSMM complies with its legal obligations

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Governance and Responsibility

Overall accountability for data protection compliance rests with: Dr Dinesh K Saraswat
Role: Director and Officer with responsibility for data protection governance

The Responsible Person oversees:

- Records of Processing Activities (ROPA)
- Data Protection Impact Assessments (DPIAs)
- Data sharing agreements
- Processor contracts
- Breach reporting and monitoring
- Policy review and regulatory engagement

Implementation of the Policy

The LSMM processes personal data in accordance with the principles set out in Article 5 UK GDPR:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

Personal data will only be processed where there is a valid lawful basis, including contract, legal obligation, legitimate interests, public task, or consent where required.
Special category data (including health or disability information) will be processed only where legally permitted and appropriately safeguarded.

Data Security

All employees are responsible for ensuring that:

- Personal data is kept secure at all times
- Personal information is not disclosed orally, in writing, electronically, or accidentally to unauthorised persons
- Paper records are kept in locked cabinets or secure offices
- Electronic data is password protected
- Portable devices are encrypted and securely stored
- Appropriate technical and organisational measures are implemented, including:
- Role-based access controls
- Secure cloud and IT systems
- Staff training and confidentiality obligations
- Regular system monitoring

Unauthorised Access

Any employee or learner who deliberately gains or attempts to gain unauthorised access to personal data, or discloses such data to an unauthorised third party, will be subject to formal disciplinary action. Serious breaches may be reported to regulators and could result in legal consequences.

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Data Breach Procedure

A personal data breach includes accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.
All staff and learners must report any suspected breach immediately to the Responsible Person.
The LSMM will:

- Investigate and assess the risk
- Notify the Information Commissioner's Office within 72 hours where required
- Inform affected individuals where there is a high risk to rights and freedoms
- Record all breaches in a Data Breach Log
- Implement corrective and preventive actions
- Breach management aligns with UK GDPR and the Data (Use and Access) Act 2025.

Learner Obligations

Learners must ensure that:

- All personal information provided to the LSMM is accurate and up to date
- Changes of address or contact details are notified promptly
- They respect the confidentiality of personal data encountered during studies

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Rights of Access to Information

Employees, learners and other data subjects have the right to access personal data held about them. Requests (Subject Access Requests) must be submitted in writing and will be responded to within statutory timeframes.
Certain disclosures may be made without consent where lawfully required, including for:

- Safeguarding national security
- Prevention or detection of crime
- Assessment or collection of tax
- Regulatory functions
- Protection of vital interests

Data Sharing

Personal data may be shared where lawful and necessary with:

- Awarding organisations
- Regulators
- Government bodies
- IT and service providers
- Safeguarding authorities

All sharing is governed by written agreements and appropriate safeguards. International transfers are only made where lawful safeguards are in place.

Retention of Data

The LSMM will not hold personal data longer than necessary.

- Core academic records: retained permanently
- Learner records: retained in accordance with the LSMM's Retention Schedule
- Staff records: retained for a minimum of six years after employment ends
- Financial, tax, and pension records: retained in accordance with statutory requirements
- Secure disposal methods are applied to all records.

Monitoring and Review

The LSMM monitors compliance through:

- Internal reviews and audits
- Risk assessments and DPIAs
- Staff training
- Annual policy review

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Conclusion

London School of Management and Media Limited is committed to maintaining the highest standards of data protection and confidentiality.

Any stakeholder who wishes to clarify the contents of this policy should contact the Responsible Person.

Any employee or learner who believes this policy has not been followed in respect of personal data should raise the matter using the LSMM's formal complaints procedure. Individuals also have the right to lodge a complaint with the Information Commissioner's Office.

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