

## Data Protection Policy

### Definitions

“Associates”, “learners” and “other data subjects” may include past, present and potential members of those groups.

“Other data subjects” and “third parties” may include contractors, suppliers, contacts, referees, friends or family members.

“Processing” refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

Any personal information you give to us will be processed in accordance with the UK Data Protection Act 1998. We will use the information to process your request and to ensure that we provide the best service to you.

### Data Usage and Storage

The information which you give when you apply to work or study with us will be used for the following purposes:

- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject’s rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

This data will:

- enable us to create a computer and paper record of your application
- enable the application to be processed
- enable us to compile statistics, or to assist other organisations to do so, provided that no statistical information that would identify you as an individual will be published.

### Personnel Responsibilities

All approved personnel (including associates / sub-contractors) shall

- ensure that all personal information which they provide to Marvellous Minds in connection with their learning experience is accurate and up-to-date;
- inform Marvellous Minds of any changes to information, for example, changes of address;

- check the information which Marvellous Minds shall make available from time to time, in automated form, and inform Marvellous Minds of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. Marvellous Minds shall not be held responsible for errors of which it has not been informed.

### **Personnel shall ensure that**

- all personal information is kept securely;
- personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

### **Learner Responsibilities**

All learners shall

- ensure that all personal information which they provide to Marvellous Minds is accurate and up-to-date;
- inform Marvellous Minds of any changes to that information, for example, changes of address;
- check the information which Marvellous Minds shall make available from time to time, in written or automated form, and inform Marvellous Minds of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. Marvellous Minds shall not be held responsible for errors of which it has not been informed.

### **Rights to Access Information**

Learners and other data subjects in Marvellous Minds have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to the Programme Director.

Marvellous Minds aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by Programme Director.

### **The Data Controller and the Designated Data Controllers**

Marvellous Minds is the data controller under the Act. They are ultimately responsible for implementation. Responsibility for day-to-day matters will be delegated to approved personnel as appropriate.

### **Assessment Marks**

Learners shall be entitled to information about their marks for assessments, however this may take longer than other information to provide. Marvellous Minds may withhold enrolment, awards, certificates, accreditation or references in the event that monies are due to Marvellous Minds.

## **Compliance**

Compliance with the Act is the responsibility of all learners and personnel. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Managing Director or the Programme Director.

Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the designated data controller initially. If the matter is not resolved it should be referred to the personnel grievance or learner complaints procedure.