

INFORMATION AND DATA PROTECTION POLICY

1. INTRODUCTION

The City and Guilds of London Art School collects and maintains certain Personal Data relating to its students, employees, trustees, and other users of its services, in order to conduct its business and to monitor, for example, performance, achievements, and health and safety. It is also necessary for the Art School to process Personal Data to ensure trustees, employees and students can be recruited, employees paid, contractors engaged, courses organised, external funding secured and compliance with the legal obligations the art School may have to regulatory and funding bodies and to government.

Data may therefore need to be collected from and about a wide range of Individuals having dealings with the Art School, including actual and prospective trustees, employees, contractors, students, alumni, past and potential future donors, Individuals involved in fund-raising and other Individual stakeholders.

The Art School recognises that controls regarding the collection, use, retention and destruction of Personal Data are essential to ensure it complies with its obligations under Data Protection Laws, in particular the Data Protection Act 2018.

The Art School has adopted and implemented this Data Protection Policy to ensure that its personnel are aware of the correct and lawful treatment of Personal Data. The Policy (and the other policies and documents referred to in it) sets out the basis on which the Art School will collect and use Personal Data either where it collects the data from individuals directly, or where the data are provided to the Art School by third parties. It also sets out the ways in which the Art School handles uses, transfers and stores Personal Data.

It applies to all Personal Data stored electronically, in paper form, or otherwise.

2. DEFINITIONS

In this Policy the following expressions have the meanings given:

Art School Personnel: any Art School trustee, employee, worker or contractor who may access any of the Personal Data held by the Art School (including consultants and temporary personnel hired to work on the Art School's behalf).

Data Controller: A Data Controller is responsible for compliance with Data Protection Laws. Examples of Personal Data of which the Art School is the Controller include employee details and information that the Art School collects relating to students. Individuals within organisations are not Controllers, it is the organisation itself that is the Controller. i.e.any entity (such as a company, organisation or person) that makes its own decisions about how it is going to collect and use Personal Data.

Data Protection Laws: all applicable laws relating to privacy and to the collection and use of Personal Data, including the Data Protection Act 2018 ('the Act'), and any applicable codes of practice issued by a regulator.

Data Protection Officer (DPO): the person designated by the Board of Trustees to monitor implementation and to provide independent advice to the Board and the Senior Management Team on data protection matters. The current DPO is the Director of Resources and Operations.

Data Subject: an Individual whose Personal Data may be requested, held or processed by the Art School.

EEA: Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.

ICO: the Information Commissioner's Office, the UK's data protection regulator.

Individuals: Living persons who can be identified, directly or indirectly, from Personal Data. For example, an Individual could be identified directly by name, or indirectly by a combination of gender, job role and office location if these data were sufficient to enable the Individual's identity to be deduced. Individuals may also include partnerships and businesses that operate as sole traders.

Personal Data: Any information about an Individual that identifies them or allows them to be identified if used in conjunction with other information that is held. Personal Data are defined broadly and include names, addresses, email addresses (including in a business context, business email addresses such as firstname.surname@organisation.com), IP addresses and other more sensitive types of data such as trade union membership, genetic data, religious belief or criminal record. These more sensitive types of data are given extra protection by Data Protection Laws.

Privacy Notice: A notice provided to Individuals whose Personal Data the Art School is collecting or receiving, informing them of the purposes for which the Art School will process their Personal Data, the retention periods for those data and with whom the data will be shared. The Art School has separate privacy notices in place for trustees, for staff and applicants and for students and prospective students, alumni, visitors and other users of the Art School's services.

Processor: Any entity (whether a company, organisation or person) that accesses or uses Personal Data on the instruction of a Controller. A Processor may be a third party organisation that processes Personal Data on behalf of a Controller.

Special Categories of Personal Data: Personal Data that reveal an Individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, inherited or acquired genetic characteristics (genetic data), physical or mental health, physical, physiological or behavioural characteristics such as facial images or fingerprints (biometric data), sex life or sexual orientation. Special Categories of Personal Data are subject to additional controls in comparison to ordinary Personal Data.

3. POLICY STATEMENT

3.1 The Art School will ensure that data are collected and used fairly, stored safely and not disclosed to any other person unlawfully. Whenever collecting information about Individuals the Art School will therefore comply with the Data Protection Principles, which are set out under the Data Protection Act 2018 ('the Act'), and require that Personal Data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to Individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed; Personal Data may be stored for longer periods insofar as they will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the Act in order to safeguard the rights and freedoms of Individuals and subject to the Art School seeking to anonymise data wherever possible; and
- f) processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.2 In ensuring that Personal Data are processed lawfully, the Art School will only process data under one of the six lawful bases for processing set out in the Act:

- a) Consent: the Individual has given clear consent for the Art School to process their Personal Data for one or more specific purposes.
- b) Contract: the processing is necessary for a contract the Art School has with the Individual, or because the Individual has asked the Art School to take specific steps before entering into a contract.
- c) Legal obligation: the processing is necessary for the Art School to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for the Art School to perform a task in the public interest or for the Art School's official functions, and the task or function has a clear basis in law.
- f) Legitimate interests: the processing is necessary for the Art School's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the Individual's Personal Data which overrides those legitimate interests. (This

cannot apply to any data that the Art School processes as a public authority to perform its official tasks.)

3.3 Special Categories of Personal Data are subject to additional controls above and beyond those that apply to all Personal Data. The Art School will only process data in these special categories under the conditions set out in Schedule 1 of the Act, which can be summarised as follows:

- a) the Individual has given explicit consent
- b) processing is necessary to comply with employment and social security obligations
- c) processing is necessary to protect the vital interests of the Individual or another person and the Individual is not physically or legally able to give consent
- d) the Individual has manifestly made the data public
- e) processing is necessary for the establishment or defence of legal claims
- f) processing is necessary for reasons of substantial public interest
- g) processing is necessary for reasons connected with the health of the Individual
- h) processing is necessary for public health reasons
- i) processing is necessary for archiving, research or statistical purposes

In processing Special Categories of Personal Data, Art School Personnel must refer to the detailed guidance published by the ICO; in the absence of that detailed guidance, advice should be sought from the Data Protection Officer.

Personal Data that relate to criminal convictions or offences or to related security measures are also subject to additional controls, which are broadly in line with those that apply to special categories of Personal Data. In processing data of this type, Art School Personnel should again refer to the detailed guidance to be published by the ICO and, in the absence of that detailed guidance, seek advice from the Data Protection Officer.

3.4 The Art School recognises that Individuals have the following rights:

- a) the right to be informed of the data that the Art School holds on them in a concise, transparent, intelligible and easily accessible way. The Art School will typically make this information available through a Privacy Notice;
- b) the right of access to their Personal Data and supplementary information, and to be aware of and verify the lawfulness of the processing;
- c) the right to rectification of their Personal Data if they are inaccurate or incomplete;
- d) the right to request the deletion or removal of Personal Data where there is no compelling reason for their continued processing (the 'right to be forgotten');
- e) the right to 'block' or suppress processing of Personal Data;
- f) the right to data portability: to move, copy or transfer Personal Data easily from one IT environment to another in a safe and secure way, without hindrance to usability, where it is processed by automated means;
- g) the right to object to: processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct

marketing (including profiling); and processing for purposes of scientific/historical research and statistics; and

h) the right not to be subject to a decision when it is based solely on automated processing and produces a legal effect or a similarly significant effect on the Individual.

In interpreting the Data Protection Principles and in making judgments on specific matters, the Art School will take account of the most recent guidance issued by the ICO.

4 RESPONSIBILITIES

4.1 The Art School is the Data Controller and the Board of Trustees is therefore ultimately responsible for implementation. The Board has delegated day-to-day responsibility for implementation of the Policy to the Principal. It has appointed a Data Protection Officer to monitor implementation and to provide independent advice to the Board and the Senior Management Team on data protection matters.

4.2 The **Data Protection Officer** shall directly report to the Governing Body and shall:

- inform and advise the Art School and its employees who carry out processing of their obligations under Data Protection Laws;
- monitor compliance with Data Protection Laws and this Policy and any other data protection policies of the Art School, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations;
- cooperate with the ICO;
- act as the contact point for the ICO on issues relating to processing; and
- report to the Board of Trustees on any matters of concern relating to the substance or implementation of the Policy.

4.3 **Managers** must ensure that:

- all Personal Data processed within or by members of their curriculum or professional service teams are processed according to the Data Protection Principles outlined in 3.1 above;
- Privacy Notices have been adequately communicated to those whose data are collected, stored or processed;
- consent has been duly obtained where it forms the lawful basis for processing the data;
- Individuals have been made aware of their rights under the Data Protection Laws;
- If at any time a change is contemplated in how any Personal Data are used, they inform the DPO who will decide whether the intended use requires any amendments to be made or any other controls applied;
- any third parties who are commissioned to process Personal Data on the Art School's behalf are engaged under a written contract which includes those terms required under the Data Protection Laws as set out in guidance issued by the ICO;
- the principles of "privacy by design" are observed in planning projects and that, where required, a Data Protection Impact Assessment is undertaken in conjunction with the Data Protection Officer;
- any breaches of Personal Data are immediately notified to the Data Protection Officer who will investigate accordingly and where necessary notify the ICO. A

personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration or unauthorised disclosure of or access to personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is not just about losing personal data and can include:

- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

4.4 **Art School Personnel** are responsible for:

- checking that any data that they provide to the Art School in connection with their office, employment or service contract are accurate and up-to-date;
- informing the Art School of any changes to the data that they have provided, such as changes of address, next of kin or bank details;
- checking the information that the Art School will send out from time to time, giving details of data held and processed that relate directly to them;
- informing the Art School of any errors or changes; and
- ensuring that they abide by the Art School's Information Systems Acceptable Use Policies.

The Art School cannot be held responsible for any errors unless the Individual has informed the Art School of them.

If and when, as part of their responsibilities, Art School Personnel collect Personal Data they must comply with the Data Protection Guidelines for Art School Personnel, which are shown at Annex 1. In particular they are responsible for ensuring that:

- any Personal Data that they hold are kept securely;
- when Personal Data need to be transmitted, internally or externally, they are transmitted securely in accordance with the Art School's IT Systems Acceptable Use Policy; and
- Personal Data are not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Employees should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases.

Personal Data must:

- if held in digital form:
 - be password protected; and
 - be kept only on electronic media which are themselves kept securely;
- and
- if held on paper:
 - be kept in a locked filing cabinet; or
 - be kept in a locked drawer.

4.5 **Students** must ensure that all Personal Data provided to the Art School are accurate and up-to-date. They must ensure that changes in their Personal Data, including changes of address, are notified to the Student Services Team.

Students who use the Art School's computer facilities may, from time to time, process their own Personal Data. If they do so they must ensure that they comply with the Art School's IT Systems Acceptable Use Policy.

5. DATA SUBJECT RIGHTS

Data Subjects have rights in relation to the data that are held about them, and how those data are processed, as set out in 3.4 above. The Art School will use all Personal Data in accordance with the rights given to Individuals under Data Protection Laws, and will ensure that it allows Individuals to exercise those rights, including but not limited to the following:

5.1 Subject access requests

Trustees, employees, students and other persons from or about whom the Art School has collected Personal Data have the right to receive confirmation of and to access any Personal Data that are held about them in digital, paper or any other form. Any person who wishes to exercise this right should submit a request to the Data Protection Officer.

The Art School aims to comply with requests for access to Personal Data as quickly as possible, and will ensure that it is provided within one month unless requests are complex or numerous. If this is the case, the Art School will inform the Individual within one month of the receipt of the request that it needs to extend the period of compliance by up to a further two months and will explain why the extension is necessary.

The Art School reserves the right to charge a reasonable fee, taking into account the administrative costs of providing the data requested, where a request is manifestly unfounded or excessive, or where there are repeated requests for the same data. In exceptional circumstances the Art School may exercise its right to refuse to respond but will explain its reason to the person making the request within one month of the receipt of the request, informing them of their right to complain to the supervisory authority and to seek judicial remedy.

5.2 Right of Erasure (right to be forgotten)

Data Subjects may request the erasure of Personal Data concerning them where:

- the use of the Personal Data is no longer necessary;
- the Data Subject's consent is withdrawn and there is no other legal ground for the processing;
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the Personal Data have been unlawfully processed; or
- the Personal Data have to be erased to enable compliance with a legal obligation.

In a marketing context, where Personal Data are collected and processed for direct marketing purposes, the Data Subject has a right to object to processing at any time. Where the Data Subject objects, the Personal Data must not be processed for such purposes.

5.3 Right of Data Portability

Data Subjects have the right to request that data concerning them are provided to them in a structured, commonly used and machine readable format where:

- the processing is based on consent or on a contract; or
- the processing is carried out by automated means.

5.4 Right of Rectification and Restriction

Data Subjects have the right to request that any Personal Data are rectified if inaccurate and that in certain circumstances use of their Personal Data be restricted to particular purposes.

6 DATA SENSITIVITY

Sometimes it is necessary to process data about a person's health, criminal convictions, race, gender or family details. This may be to ensure that the Art School is a safe place for everyone, or to operate other Art School policies, such as the Sick Pay Policy or Equality and Diversity Policy. The Art School may also ask for data relating to particular health needs, such as allergies to particular forms of medication, or any conditions such as asthma or diabetes. The Art School will only process such data where one of the relevant conditions referred to in Section 3.3 above has been met.

7. PUBLICATION OF INFORMATION

7.1 It is the Art School's policy, in the interests of transparency and promoting its objectives, to make public as much information as possible, and in particular the following information will be available to the public for inspection:

- names, photographs and brief biographical details of members of the Board of Trustees; and
- names and Art School contact details of Senior Management Team.

7.2 The Art School also publishes a number of documents that include Personal Data, and will continue to do so. These Personal Data include, but are not limited to:

- a) names and roles of all members of the Board of Trustees and its committees;
- b) names and job titles of employees;
- c) internal telephone/email directory;
- d) student exam results including grades;
- e) information (including photographs) in course handbooks, leaflets, guides, reports, newsletters, etc; and
- f) other information published on the Art School website or virtual learning environment.

7.3 There may be occasions when a member of Art School Personnel, a student or another Data Subject requests that their Personal Data in some of these categories remain confidential or are restricted to internal access. In such instances, the Art School will comply with the request, subject to any obligations it may have under the Freedom of Information Act, and ensure that appropriate action is taken.

8. RETENTION & DISPOSAL

8.1 The Art School will keep Personal Data only for as long as it is required to retain them for legal or other statutory reasons or as required by the regulatory, funding or body, validation partner or to meet its responsibilities as an employer (for example, in relation to data regarding pensions, taxation, potential or current disputes or litigation regarding the employment), contractor or education provider. A schedule of retention for different categories of Personal Data will be maintained by the Data Protection Officer.

8.2 Personal Data will be disposed of in a way that protects the rights and privacy of Data Subjects (for example, by shredding, disposal as confidential waste or secure electronic deletion).

9. DATA SECURITY

9.1 In order to ensure the protection of Personal Data held electronically, Art School Personnel and students are required to adhere to the Art School's IT Systems Acceptable Use Policies. Breaches of those policies where they concern misuse of Personal Data will be treated as disciplinary matters.

9.2 The Art School's IT Manager is responsible for ensuring that there are appropriate and adequate security measures in place including, as part of the Art School's business continuity arrangements, an IT Recovery Plan.

9.3 Should there be a breach of security the Art School will notify any Individuals whose Personal Data may have been disclosed to a third party as a result of the breach and, where necessary under the ICO's Guidance on Notification of Data Security Breaches, will report the breach to the Information Commissioner's Office.

10. CCTV

10.1 To protect Art School premises and the property of Art School Personnel, students and other users of the Art School's premises, closed-circuit television cameras are in operation in various parts of the Art School. Images of people and information about people derived from images are covered by the Data Protection Laws.

10.2 Personal Data obtained through the use of CCTV will only be processed in accordance with the ICO's CCTV Code of Practice and in particular:

- a) monitoring will be carried out only by a limited number of specified Art School Personnel;
- b) cctv recordings will be accessed only by the Principal, Director of Resources and Operations, the Site Manager or other duly authorised Art School Personnel, including those responsible for IT services, Reception and Security;
- c) Personal Data obtained during monitoring will be destroyed as soon as possible after any investigation is complete; and
- d) Art School Personnel involved in monitoring will maintain confidentiality in respect of Personal Data.

11. THIRD PARTY CONTRACTORS

11.1 If the Art School appoints a contractor who is a Processor of the Art School's Personal Data, the Art School will only make the appointment after it has carried out sufficient due diligence and has appropriate contracts in place.

11.2 Data Protection Laws require that a Controller must only use Processors who meet the requirements of the Act and protect the rights of Individuals. This means that data protection due diligence (and especially security due diligence) must be undertaken on both new and existing suppliers. Once a Processor is appointed they should be audited periodically to ensure that they are meeting the requirements of their contract in relation to Data Protection.

11.3 The Art School is considered as having appointed a Processor where it engages a contractor to perform a service and as part of that service the contractor may get access to some of the Art School's Personal Data. The Art School, as Controller, remains responsible for what happens to the Personal Data. Any contract appointing a Processor must be in writing and must contain the following obligations as a minimum:

- to act only on the written instructions of the Controller;
- not to export Personal Data without the Controller's instruction;
- to ensure that staff are subject to confidentiality obligations;
- to take appropriate security measures;
- only to engage sub-processors with the prior consent (specific or general) of the Controller and under a written contract;
- to keep the Personal Data secure and assist the Controller to do so;
- to assist with the notification of data breaches and Data Protection Impact Assessments;
- in so far as possible, to assist the Controller to fulfil its obligations to respond to requests from Individuals exercising their rights, including subject access requests;
- to delete/return all Personal Data as requested at the end of the contract;
- to submit to audits and provide information about the processing; and
- to tell the Controller if any instruction is in breach of data protection law.

11.4 In addition the contract should set out:

- the subject matter and duration of the processing;
- the nature and purpose of the processing;
- the types of Personal Data and categories of Individuals; and
- the obligations and rights of the Controller.

12. AUTOMATED DECISION MAKING & PROFILING

12.1 Data Protection Laws require certain controls around profiling and automated decision making in relation to Individuals:

- *Automated Decision Making* occurs where the Art School makes a decision about an Individual solely by automated means without any human involvement and the decision has legal or other significant effects; and
- *Profiling* occurs where the Art School automatically uses Personal Data to evaluate certain things about an Individual.

12.2 The Art School would only carry out any Automated Decision Making or Profiling if it is confident that it is complying with Data Protection Laws. If Art School Personnel wish to carry out any Automated Decision Making or Profiling they must obtain the prior approval of the Data Protection Officer.

12.3 Automated Decision Making or Profiling is not carried out in relation to Art School activities.

13 IMPACT ASSESSMENTS

13.1 Data Protection Law requires a risk assessment to be undertaken in relation to the use of Personal Data for a new service, product or process. This must be done prior to the processing via a Data Protection Impact Assessment (DPIA). A DPIA should be started as early as practical in the design of processing operations. A DPIA is not a prohibition on using Personal Data but is an assessment of issues affecting Personal Data that need to be considered before a new product/service/process is rolled out. The process is designed to:

- describe the collection and use of Personal Data;
- assess its necessity and its proportionality in relation to the purposes;
- assess the risks to the rights and freedoms of individuals; and
- evaluate the measures that are proposed to address the risks.

13.2 A DPIA must be completed where the use of Personal Data is likely to result in a high risk to the rights and freedoms of individuals. The ICO's standard DPIA template is available from www.ico.org.uk.

13.3 Where a DPIA reveals risks which are not appropriately mitigated the ICO must be consulted. Where the Art School is launching or proposing to adopt a new process, product or service which involves Personal Data, the Art School needs to consider whether it needs to carry out a DPIA as part of the project initiation process. The Art School needs to carry out a DPIA at an early stage in the process so that the Art School can identify and fix problems with its proposed new process, product or service at an early stage, reducing the associated costs and damage to reputation, which might otherwise occur.

13.4 Situations where the Art School may have to carry out a DPIA include the following (please note that this list is not exhaustive):

- large scale and systematic use of Personal Data for the purposes of Automated Decision Making or Profiling (see definitions above) where legal or similarly significant decisions are made;
- large scale use of Special Categories of Personal Data, or Personal Data relating to criminal convictions and offences e.g. the use of high volumes of health data; or
- systematic monitoring of public areas on a large scale, for example by CCTV cameras.

13.5 All DPIAs must be reviewed and approved by the Data Protection Officer.

14 Data Transfer

14.1 Data Protection Laws impose strict controls on Personal Data being transferred outside the EEA. Transfer includes sending Personal Data outside the EEA but also includes storage of Personal Data or access to it outside the EEA. It needs to be thought about whenever the Art School appoints a supplier outside the EEA or with group companies outside the EEA that may give access to the Personal Data to staff outside the EEA.

14.2 So that the Art School can ensure it is compliant with Data Protection Laws, Art School Personnel must not export Personal Data outside the EEA without the prior approval of the Data Protection Officer.

15 Review and Monitoring

This Policy will be formally reviewed every five years, although amendments will be made in the interim where legislation, case law or operational experience necessitate.

This Policy was last approved by the Board of Trustees on the recommendation of the Audit and Risk Committee in November 2022 and will next be reviewed in the 2027/28 academic session.

Annex 1

Data Protection Guidelines

1. Many Art School Personnel will process data about students on a regular basis, when writing reports or references, or as part of a pastoral or academic supervisory role. Other Art School Personnel may need to process data about fellow members of Art School Personnel or other Individuals. The Art School will ensure through registration, recruitment and induction procedures that all students and Art School Personnel give their consent to such processing, and are notified of the categories of processing, as required by the Data Protection Laws.

The information that Art School Personnel deal with on a day-to-day basis will be 'standard' and will cover categories such as:

- general personal details such as names and addresses;
- details about attendance, or about course work marks, grades and associated comments or performance at work; and
- notes of personal supervision, including matters about behaviour and discipline.

2. Personal Data that reveal an Individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, inherited or acquired genetic characteristics (genetic data), physical or mental health, physical, physiological or behavioural characteristics such as facial images or fingerprints (biometric data), sex life, sexual orientation or criminal convictions or offences or related security measures are sensitive. They can only be collected and processed either with the Data Subject's explicit consent or in a very limited range of other circumstances.

If Art School Personnel need to record such data where agreed Art School policies and practices require or encourage its recording, they should use Art School standard forms and templates.

3. All Art School Personnel have a duty to make sure that they comply with the Data Protection Principles, which are set out in the Art School Data Protection Policy. In particular, they must ensure that records are:

- (a) accurate;
- (b) up-to-date;
- (c) fair; and
- (d) kept and disposed of safely, and in accordance with Art School Policy.

Art School Personnel must ensure that they keep confidential all Personal Data that they collect, store, use and come into contact with during the performance of their duties.

4. Art School Personnel must not release or disclose any Personal Data (whether in speech, by telephone, by email or by any other means):

- (a) outside the Art School; or
- (b) inside the Art School to Art School Personnel not authorised to access the data without specific authorisation from their line manager or the Data Protection Officer.

5. Art School Personnel must take all steps to ensure there is no unauthorised access to Personal Data whether by other Art School Personnel who are not authorised to see such Personal Data or by people outside the Art School

6. Before processing any Personal Data, Art School Personnel should consider the following checklist:

- Do you really need to record the data?
- Do the data fall within one of the Special Categories of Personal Data or relate to a criminal conviction or offence or to any related security measures?
- If so, are you satisfied that at least one of the conditions for processing such data is met (including, where no other condition is met, the Data Subject's express consent)?
- Has the Data Subject been told that data of this type will be processed?
- Are you authorised to collect/store/process the data?
- If so, have you checked with the Data Subject that the data are accurate?
- Are you sure that the data are secure?
- If you do not have the data subject's consent (or, for certain types of data, express consent) to process, are you satisfied that you have another lawful basis for processing the data?
- Have you reported the fact of data collection to the authorised person within the required time?