



OXFORD COLLEGE

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Date: 21 May 2025

DATA PROTECTION POLICY AND PRIVACY NOTICE

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1. INTRODUCTION

Oxford College Ltd is committed to protecting the rights and privacy of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy and notice outline how we collect, use, store, and manage personal data to ensure it is processed lawfully, fairly, and transparently.

2. PURPOSE

This policy aims to:

- Inform individuals of how their data is used.
- Ensure staff and students understand their responsibilities.
- Demonstrate compliance with data protection laws.
- Minimise risk related to data handling and processing.

3. SCOPE

This policy applies to:

- All personal data processed by Oxford College Ltd in any format.
- All employees, students, contractors, and third parties acting on behalf of the college.

4. DEFINITIONS

Personal Data:

Any information relating to an identified or identifiable individual (data subject).

Special Category Data:

Sensitive information such as health records, ethnicity, religious beliefs, and biometric data.

Data Controller:

Oxford College Ltd, which determines how and why data is processed.

Data Processor:

A third party processing data on behalf of the college.

5. PRINCIPLES OF DATA PROCESSING

Oxford College Ltd commits to data processing based on the following principles:

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

6. TYPES OF DATA COLLECTED

We collect personal data such as:

- Contact and identity information (e.g. name, ID, email, phone)
- Academic and employment history
- Attendance, performance, and disciplinary records
- Financial data related to payments or funding
- Health information where relevant to support

7. LAWFUL BASIS FOR PROCESSING

Data is processed under the following legal bases:

- Consent
- Contractual necessity
- Legal obligations
- Vital interests
- Legitimate interests pursued by the college

8. RIGHTS OF DATA SUBJECTS

All individuals have the following rights:

- Access to their data
- Rectification of inaccurate data
- Erasure ('right to be forgotten')
- Restriction of processing
- Data portability
- Objection to processing
- Right to lodge complaints with the ICO

Requests should be submitted to: dpo@oxford.edu.eu

9. DATA SECURITY

- Personal data is stored securely in digital and physical formats.
- Encryption, firewalls, password protection, and role-based access controls are used.
- Paper records are held in locked cabinets and accessed only when necessary.

10. DATA RETENTION

- Data is retained only as long as necessary for its intended purpose.

- A formal retention schedule is maintained.
- Once no longer needed, data is securely destroyed or anonymised.

11. THIRD PARTY DATA SHARING

Data may be shared with:

- Regulatory and awarding organisations
- Professional or legal bodies
- Service providers (e.g. IT, certification)

All third parties must comply with the college's data protection requirements.

12. DATA BREACHES

- Breaches must be reported immediately to the Data Protection Officer (DPO).
- Significant breaches are reported to the Information Commissioner's Office (ICO) within 72 hours.
- Affected individuals are notified when appropriate.

13. TRAINING AND AWARENESS

- All staff receive data protection training upon induction.
- Refresher courses are provided annually.
- Data protection responsibilities are included in job descriptions.

14. WEBSITE PRIVACY

Oxford College's website may collect data via:

- Online forms (contact, registration)
- Cookies (see separate Cookie Policy)
- Analytics tools

All data collected via the website is processed with the same care and legal compliance.

15. REVIEW

This policy is reviewed annually or in response to changes in data protection law.

Approved by:

Principal, Oxford College Ltd

Date: 21 May 2025