



BROMLEY ADULT EDUCATION COLLEGE
Data Protection & Data Security Policy
2025-2026

Developing individuals and communities by providing accessible, high quality learning opportunities and skills training

Reviewed and approved by:	SMT
Date:	September 2025
Next review date:	August 2026

Introduction

Bromley Adult Education College (BAEC) collects and processes personal information relating to applicants, staff, volunteers and learners. BAEC has a legal duty to protect that data and to ensure security of all systems. It is also responsible for personal data collected by partner organisations on behalf of BAEC as well as any personal data which it handles or shares with third parties.

BAEC is committed to protecting your personal information when you use our services. This Policy relates to BAEC usage of any personal information that is collected from you. Whenever you provide such information BAEC will manage the processing of personal information in compliance with the eight key GDPR principles. Full information is contained on the Information Commissioner's Office (ICO) website <https://ico.org.uk/for-organisations/guide-to-data-protection>

Why does BAEC collect personal information about me and how will it be used?

We collect personal information about you when you:

- Apply or enrol for any of our courses
- Create a BAEC learner account
- Phone or email us

We also collect information on your attendance during the course, your intended destination and your achievement against formal or informal targets.

BAEC will ensure that all data collected has a specified, explicit and legitimate purpose; is relevant, adequate and is limited to what is necessary in relation to the purposes stated.

When you provide BAEC with your personal information it will be stored and may be used by us for the following purposes:

- To enrol you on one of our courses and to give you access to course materials
- To comply with the funding and audit requirements of the GLA (Greater London Authority) or ESFA (Education and Skills Funding Agency)
- To register you with the relevant examination bodies, if appropriate
- To provide you with information about our courses
- To send postal or electronic communications

What type of information will BAEC collect about me?

- Name, ethnic origin, sex, and date of birth
- Contact details including postal address, email and phone

- Employment situation
- Prior education level
- Residency status
- Your benefits status
- Disability / learning difficulty information and support information where relevant
- Records of academic assessment and outcome

How does BAEC store information about me and how long will it be retained?

Access to all personal data is restricted to those who need to process the data for the purposes stated.

Paper records are only held in restricted access areas. Access to electronic data is through a user log-on and password. Electronic data held on BAEC servers is backed up regularly to mitigate against loss. BAEC centres are alarmed at all times when closed. Servers are protected by physical security, access control and fire detection. Protection against malicious software and hacking is provided by a multi-level approach involving firewall, router configuration, email scanning and virus protection.

BAEC also uses a secure off-site data centre with a high level of physical security and back-up procedures in place to protect data.

DBS certificates and other sensitive data are kept securely in lockable, non-portable storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. DBS certificate information is removed from files and disposed of by immediate shredding before files are archived.

Staff are instructed to lock digital devices when unattended. Staff working remotely, including teaching staff, comply with the requirements above and all online delivery is compliant with GDPR eight guiding principles.

Data will not be taken off-site or transferred between sites unless there is an essential business reason for doing so (e.g. transporting course materials). Measures must be put into place to ensure data in transit cannot be lost or stolen and at no time will documents be left unattended (including in a vehicle or at home).

BAEC will hold and process your personal information on our systems only for the purpose for which the data was originally collected unless we have notified you

differently. If you enrol on a BAEC course we will retain your personal information in line with our responsibilities to record and report on this information for the Greater London Authority (GLA).

Who will BAEC share my information with?

As BAEC receives government funding it is legally required to share learner personal data collected when you enrol on a course with its funders the GLA and/or the ESFA.

If you enrol on a qualification course, your information will also be shared with the external awarding body and the Learner Record Service.

BAEC adheres to the ESFA Privacy Policy which is updated annually and can be viewed [via our website](#), along with the Data Policy of Bromley council which can be viewed on the [council's website](#).

How will BAEC deal with information access requests?

You have the right to request a copy of the personal information we hold about you, except where releasing that information would breach another person's privacy or where an exemption to data protection law applies.

You have the right to ask us to update or amend the information we hold about you if it is incorrect.

You have the right to ask us to remove your personal information from our records.

Subject Access Requests need to be made via the London Borough of Bromley.

How will BAEC dispose of data?

All personal data will be disposed of in a secure manner. Paper documents will be shredded either internally or by use of a vetted specialist contractor. Data will be wiped from all hardware by BAEC before its disposal.