(which may at times exceed those of College policies with respect to storage or security requirements e.g. for funded research).

5. This policy is approved by the College Council and will be reviewed annually. Council remains responsible for ensuring appropriate resources are in place to achieve compliance with data protection law in line with an appropriate overall risk profile.

Obligations of the College

6. The College upholds data protection law as part of everyday working practices, by:

ensuring all personal information is managed appropriately through this policy; understanding, and applying as necessary, the data protection principles when processing personal information;

understanding, and fulfilling as necessary, the rights given to data subjects under data protection law;

understanding, and

accountability

obligations under data protection law; and

the publication of data protection statements outlining the details of its personal data processing in a clear and transparent manner.

Further details about the above may be found in the Annex on page 4.

7. The College shall appoint a statutory data protection officer, who will work with the College Data Protection Lead to:

monitor and audit under data protection law, especially its overall risk profile, and report on such annually to the College:

advise the College on all aspects of its compliance with data protection law;

h regard to data protection law, including in the case of personal data breaches; and act as an available point of contact for complaints from data subjects.

- 8. The College shall otherwise ensure all members and staff are aware of this policy and any associated procedures and notes of guidance relating to data protection compliance, provide training as appropriate, and review regularly its procedures and processes to ensure they are fit for purpose. It shall also maintain records of its information assets.
- 9. Individual members and staff are responsible for:

completing relevant data protection training, as advised by the College; following relevant College policies, procedures and notes of guidance; only accessing and using personal information as necessary for their contractual duties and/or other College roles;

ensuring personal information they have access to is not disclosed unnecessarily or inappropriately;

where identified, reporting personal data breaches, and co-operating with College authorities to address them; and

only deleting, copying or removing personal information when leaving the College as agreed with the College and as appropriate.

Non-observance of the responsibilities in paragraph 9 may result in disciplinary action against individual members or staff.

10. The obligations outlined above do not waive any personal liability for individual criminal offences for the wilful misuse of personal data under data protection legislation.

8 May 2018

Data Protection statements, advice for Data Subjects and other documentation related to Data Protection may be found on the College Data Protection page

Other resources referred tes mn B/F4 11.04 Tf 1/F4 r60 0 1 2.0.8b (1teA1 2n B/F2.109n)-3(-2(a)-02i

the right not to be subject to a decision based solely on automated decisionmaking using their personal data.

Accountability

The College is required under law to:

comply with data protection law and hold records demonstrating this;

have appropriate contracts in place when outsourcing functions that involve the processing of personal data;

maintain records of the data processing that is carried out across the College; record and report personal data breaches;

carry out, where relevant, data protection impact assessment on high risk processing activities;

cooperate with the Information

regulator of data protection law;

respond to regulatory/ court action and pay administrative levies and fines issued by the ICO.