

London School of Theology
Data Protection Policy

Group Responsible for policy and process review:	Executive Team
Executive Team member responsible:	Jonathan Mead
Date last approved:	July 2018
Date of this approval:	December 2024
Ongoing review:	Every 36 months
Review consultation:	Executive Team and Finance and General Purposes Committee
Date of next review:	December 2027

1. Introduction London School of Theology (LST) is committed to protecting the personal data of students, staff, faculty, and other individuals it engages with in accordance with the data protection principles outlined in the UK's Data Protection Act 2018 (DPA 2018) and the General Data Protection Regulation (GDPR). This Data Protection Policy sets out the framework for how LST processes personal data to ensure compliance with applicable legal and regulatory requirements, while safeguarding individual privacy rights.

2. Scope This policy applies to all personal data processed by LST, both electronically and on paper, including that which is collected, stored, and used by the institution in relation to:

- Students and applicants
- Staff and faculty members
- Trustees and volunteers
- Visitors and guests
- Contractors, service providers, and external partners
- Alumni and supporters

It covers all departments, services, and staff within LST, including those working remotely or in collaboration with external organizations.

3. Definitions For the purposes of this policy, the following definitions apply:

- **Personal Data:** Any information that relates to an identified or identifiable natural person (data subject). This includes names, contact details, academic records, employment details, and more.
- **Special Categories of Personal Data:** Sensitive data such as health information, racial or ethnic origin, religious beliefs, and other sensitive personal information.
- **Processing:** Any action or set of actions performed on personal data, such as collection, recording, storage, retrieval, use, transfer, or deletion.

4. Data Protection Principles LST is committed to ensuring that all personal data is processed in line with the following principles:

- **Lawfulness, fairness, and transparency:** Personal data will be processed lawfully, fairly, and transparently, with clear explanations provided to individuals about how their data will be used.
- **Purpose limitation:** Personal data will be collected for specific, legitimate purposes and not processed in a manner incompatible with those purposes.
- **Data minimization:** Only the data necessary for the specific purposes will be collected and processed.
- **Accuracy:** Personal data will be kept accurate, complete, and up to date. Inaccurate data will be corrected or deleted promptly.
- **Storage limitation:** Personal data will be stored only for as long as necessary to fulfil the purpose for which it was collected¹.
- **Integrity, respect and confidentiality:** Personal data will be processed in a manner that ensures appropriate security and respect for the individual, including protection against unauthorized or unlawful processing, inappropriate use, accidental loss, destruction, or damage.

5. Lawful Basis for Processing LST will only process personal data where there is a lawful basis for doing so. The following lawful bases for processing are used by LST:

- **Consent:** Obtained directly from individuals where applicable.
- **Contractual necessity:** For fulfilling obligations under a contract (e.g., student enrolment).
- **Legal obligation:** Where processing is required by law.
- **Legitimate interests:** Processing is necessary for the legitimate interests pursued by LST or a third party, provided these interests are not overridden by the rights and freedoms of the data subjects.
- **Vital interests:** Processing necessary to protect someone's life.
- **Public task:** Processing necessary for the performance of an official function in the public interest.

6. Rights of Data Subjects Individuals have the following rights in relation to their personal data:

- **Right to access:** The right to request a copy of personal data held about them.
- **Right to rectification:** The right to request the correction of inaccurate or incomplete data.
- **Right to erasure:** The right to request the deletion of personal data under certain circumstances.
- **Right to restrict processing:** The right to request a limitation on how personal data is used.
- **Right to data portability:** The right to receive personal data in a structured, commonly used, and machine-readable format.
- **Right to object:** The right to object to the processing of personal data on grounds related to their particular situation.
- **Rights related to automated decision-making:** The right not to be subject to automated decisions, including profiling, which have significant legal consequences.

To exercise these rights, individuals should contact the Data Protection Officer (DPO) Jonathan Mead Jonathan.mead@lst.ac.uk.

¹ LST uses as its guide for typical retention times the Middlesex University Retention Schedule [Retention Schedule](#)

7. Data Security and Confidentiality LST will implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Secure storage solutions (both digital and physical)
- Access control policies and procedures
- Regular training for staff on data protection best practices
- Encryption and pseudonymization where appropriate
- Secure disposal of data when no longer needed

All staff, contractors, and third-party service providers are required to maintain the confidentiality of personal data and comply with data protection regulations and will typically be asked to sign a non-disclosure agreement.

8. Data Sharing Personal data may be shared within LST for legitimate educational or operational purposes. LST may also share personal data with third parties under the following conditions:

- With student consent where applicable
- Where necessary to fulfil contractual obligations (e.g., with service providers)
- As required by law (e.g., to regulatory authorities)
- In response to lawful requests from law enforcement or government bodies

9. Data Retention Personal data will be retained only for as long as necessary to fulfil its intended purpose and comply with legal and regulatory requirements. Retention periods will be defined and regularly reviewed to ensure data is not held longer than needed.

10. Data Breach Notification In the event of a data breach, LST will take immediate action to contain and investigate the breach. If the breach poses a risk to individuals' rights and freedoms, LST will notify the Information Commissioner's Office (ICO) and affected individuals without undue delay.

11. Responsibilities

- **Data Protection Officer (DPO):** LST's DPO Jonathan Mead is responsible for ensuring compliance with this policy and overseeing data protection activities.
- **Staff:** All staff, trustees and volunteers must adhere to this policy and be aware of their responsibilities in handling personal data.
- **Students:** Students must ensure that their personal data is accurate and promptly notify the relevant department if there are changes.

12. Training and Awareness LST will provide regular training and resources on data protection to all relevant personnel to ensure compliance and awareness of data protection responsibilities.

13. Review of the Policy This policy will be reviewed annually or as necessary in response to changes in legislation, guidance, or institutional needs. Any updates will be communicated to staff and students.

14. Complaints Should you have any concerns or complaints as to how your data is being used or stored, please contact the LST Data Protection Officer (DPO) in the first instance but if still not satisfied after this then you can contact the ICO directly by using the appropriate 'contact link' on the ICO website [ICO Contact us](#)

15. Contact Information For further information or to exercise your data protection rights, please contact:

- Data Protection Officer (DPO) Email: [Jonathan.mead@lst.ac.uk] Phone: 01923 456000
Address: London School of Theology, Green Lane, Northwood HA6 2UW