



### **QMS POLICY**

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### **GDPR POLICY**

### **QUALITY STATEMENT**

“The Engineering College Quality Management System operates to support and guide staff, learners and employers in effective engagement with the services and products provided by the organisation, seeking to ensure a consistent and continuously improving quality experience to exceed the user’s expectations”.

#### **Our Vision**

“To inspire a new generation of Engineers.”

#### **Our Mission**

“Delivering outstanding technical training and assessment, connecting industry with education”.

#### **Our Values**

“To act professionally with integrity and strive for excellence”.

This policy to be reviewed annually



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### **1. Introduction**

1.1 This GDPR Policy outlines how The Engineering College complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to ensure the protection and privacy of personal data.

#### 1.2 Scope

This Policy applies to all employees, contractors and third parties who process personal data on behalf of The Engineering College.

### **2. Key Definitions**

#### 2.1 Personal Data

Any information relating to an identified or identifiable natural person ('data subject').

#### 2.2 Data Processing

Any operation or set of operations performed on personal data, including collection, recording, organisation, structuring, storage, adaptation, or alteration.

### **3. Data Protection Principles:**

The Engineering College adheres to the following GDPR principles:

#### **3.1 Lawfulness, Fairness and Transparency**

Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

#### **3.2 Purpose Limitation**

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.

#### **3.3 Data Minimisation**

Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.



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#### **3.4 Accuracy**

Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

#### **3.5 Storage Limitation**

Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data 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 GDPR in order to safeguard the rights and freedoms of the data subject.

#### **3.6 Integrity & Confidentiality**

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.

#### **3.7 Accountability**

The CEO is responsible for, and able to demonstrate, compliance with the principles of data protection.

#### **3.8 Legal Basis for Processing**

The Engineering College processes personal data under one or more lawful bases as defined in Article 6 of the UK GDPR. These include:

- Consent of the data subject
- Performance of a contract
- Compliance with a legal obligation
- Protection of vital interests
- Performance of a task carried out in the public interest
- Legitimate interests pursued by The Engineering College or a third party.



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### **4. Data Subject Rights**

#### **4.1 Right to Access**

Data subjects have the right to access their personal data held by The Engineering College

#### **4.2 Right to Rectification**

Data subjects have the right to request the correction of inaccurate personal data.

#### **4.3 Right to Erasure**

Data subjects have the right to request the deletion of their personal data under certain circumstances. We have the right to hold data for government audit purposes for 10 years. Data required for these purposes will not be covered by the right to erasure.

#### **4.4 Right to Restriction of Processing**

Data subjects have the right to restrict the processing of their personal data under certain circumstances.

#### **4.5 Right to Data Portability**

Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format.

#### **4.6 Right to Object**

Data subjects have the right to object to the processing of their personal data under certain circumstances.

### **5. Data Security Measures**

The Engineering College implements appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of personal data. This includes:

- 5.1 Encryption of personal data.
- 5.2 Regular data security assessments.
- 5.3 Access controls and authentication mechanisms.



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- 5.4 Employee training on data protection.
- 5.5 Incident response and breach notification procedures.
- 5.6 Regular review of third-party processors' compliance with data protection standards.
- 5.7 Use of multi-factor authentication for systems containing personal data.
- 5.8 Secure data disposal procedures for physical and electronic records

## **6. Data Breach Response**

6.1 The Engineering College will report any notifiable personal data breach to the Information Commissioner's Office (ICO) within **72 hours** of becoming aware of it, where feasible

## **7. Data Protection Officer (DPO)**

7.1 The Engineering College has appointed a Data Protection Officer who is responsible for overseeing compliance with the GDPR and acting as a point of contact for data subjects and supervisory authorities.

## **8. Data Processing Records**

8.1 Code Nation maintains records of its data processing activities, including the purposes of processing, categories of data subjects, and any third-party recipients.

## **9. Data Protection Impact Assessments (DPIAs)**

9.1 The Engineering College conducts Data Protection Impact Assessments for high-risk processing activities, as required by the GDPR.

## **9A. Third-Party Processors**

The Engineering College ensures that all third-party processors who handle personal data on its behalf are bound by Data Processing Agreements (DPAs) that include GDPR-compliant clauses on confidentiality, security, and breach notification.



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### **10. International Data Transfers**

10.1 The Engineering College ensures that any international transfers of personal data comply with the GDPR's requirements, including the use of Standard Contractual Clauses or other approved mechanisms.

### **11. Updates and Review**

11.1 This UK GDPR policy is reviewed regularly and updated as necessary to ensure ongoing compliance with data protection laws and regulations. Monthly SLT meetings are held to circulate reviews and updates. Any updates required to the wider audience are done so through teams.

### **12. Training and Awareness**

12.1 The Engineering College provides mandatory annual GDPR training and refresher sessions for all staff and contractors. Completion is monitored, and additional training is provided following any changes to legislation or internal processes

### **13. Complaints and Concerns**

13.1 Data subjects may raise concerns or complaints regarding the processing of their personal data by contacting The Engineering College. Data subjects may raise concerns or complaints by contacting The Engineering College or by contacting the Information Commissioner's Office (ICO) at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

### **14. Approval and Implementation**

This UK GDPR Policy has been approved by The Engineering College and is effective as of 23 January 2026.



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#### Policy Review:

The Engineering College has the right to revise and update policies as required. All employees, learners and stakeholders will be notified and updated on the policy changes and expected to comply.

Last Review:	23 January 2026	v5
Next Review:	23 January 2027	