



DATA PROTECTION POLICY

Policy	Data protection
Approved By:	Board of Trustees
Approval Date:	19.04.2018
Next review Date:	17.03.2019
Policy Holder:	IBTI

1. Introduction

In order to operate efficiently the International Bible Training Institute (IBTI) needs to collect and use information about the students, volunteers and staff with whom we work. This includes current, past and prospective staff, volunteers, students, sponsors, donors, supporters and others with whom we communicate.

IBTI regards the lawful and correct treatment of personal information as integral to its successful operation, and to maintaining the confidence of the people we work with. To this end we fully endorse and adhere to the principles of the Data Protection Act (1998).

The Act sets out eight Data Protection Principles. In summary these state that personal data shall:

- be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met;
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose;
- be adequate, relevant and not excessive for those purposes;
- be accurate and kept up to date;
- not be kept for longer than is necessary for that purpose;
- be processed in accordance with the data subject's rights;
- be kept safe from unauthorised access, accidental loss or destruction;
- not be transferred to a country outside the European Economic Area, unless that country has adequate levels of protection for personal data.

Further details are given on the website of the [Office of the Information Commissioner](#).

2. Purpose

The purpose of this policy is to ensure that everyone handling personal information at IBTI is fully aware of the requirements of the Act and complies with data protection procedures and that data subjects are aware of their rights under the Act.

3. Location of the policy

The college will ensure that the policy is available to all students, volunteers and staff and will also be on the IBTI website: www.ibti.org.uk.





4. Definitions and Scope

As a College we are required to take specific measures to ensure that all information (“personal data”) held about living individuals, in either paper-based or computer format, is processed according to eight Data Protection Principles. This Policy applies to current, past and prospective staff, volunteers, students, sponsors, donors, supporters and others with whom we communicate.

4.1. Definitions of terms used in this policy

- **Data**

Data can be in computer or paper form and is any system that is a structured set of personal data and the records can be centralised, decentralised or dispersed. In effect this means all records of our: staff,volunteers, student sponsors, donors, supporters and others with whom we communicate.

- **Personal Data**

Personal data is information that relates to an individual who can be identified from that information, either by itself, or when used in conjunction with other information held by the college or other information likely to come into the possession of the college, to identify that person. It includes any expression of opinion about an individual and any indication of the intentions of the college in respect of the individual. It includes information stored in any medium: paper and electronic, text, image, audio and visual.

- **Sensitive Personal Data**

Sensitive personal data is personal data that could be used to discriminate against an individual or may cause them to be treated differently from others.

- **Data Subject**

Data subject means an individual who is the subject of personal data. This will refer to current, past and prospective staff,volunteers, students, sponsors, donors, supporters and anyone else about whom we collect personal data. The Act does not count as a data subject an individual who has died or who cannot be identified or distinguished from others.

- **College Data Protection Notification**

The College Data Protection Notification is the "small print" that appears on forms, which are sometimes called privacy statements or collection texts. They are used to inform the person from whom personal data are being collected, the data subject, how their data will be processed.

Guidance from the Office of the Information Commissioner on writing fair processing notices is given in [Privacy Notices Code of Practice](#).



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• College Fair Processing Statement

The College collects, holds and processes personal data relating to its staff, volunteers, students, sponsors, donors, supporters and anyone else about whom we collect personal data, in accordance with the Data Protection Act 1998. The information that they provide is used for the administration, planning and management of the work of the college, student education and training and administering of student and College funding.

The College may be legally required to pass on some of this data to various agencies, government departments and local authorities. In this case the information is used for the exercise of functions of these government departments and to meet statutory requirements. The IBTI may share some information with other organisations, charities and churches with which it collaborates and where necessary regarding a student's placement and outreaches. The information that students provide may also be shared with awarding bodies, other organisations for education, training, volunteer work, employment and wellbeing-related purposes. If requested, information may be shared with the Police in relation to a crime.

You may be contacted after you have completed your programme at IBTI or your volunteer work for further collaboration with IBTI and its projects. You can indicate on your permission form if you do not want to be contacted. Further information about the use of, and access to, your personal data and details of organisations with which we may share data, you can get from the Human Resources Office at IBTI.

All information provided will be dealt with in accordance with the College Data Protection Policy. Personal information will not be passed onto other organisations for their own marketing or sales purposes.

The data that we collect are:

- personal details (name, address, date of birth)
- phone numbers
- email addresses
- gender
- photographs
- academic marks
- appraisals
- references
- disciplinary information
- criminal offence or conviction information
- health and disability information
- ethnicity data



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- dietary requirements
- information regarding your skills, hobbies and interests
- any other legitimate personal data relating to academic and pastoral support.

Primary purposes for processing student information are:

- To enable effective communications with you.
- To support your training, health, safety and welfare/ pastoral care requirements.
- To administer the financial aspects of your relationship with us and any funders, e.g. payment of students' lodging, provision of funds.
- Security and crime prevention
- To manage your use of facilities and participation in events (e.g. computing, including email accounts and internet access, libraries, accommodation, functions, graduation).
- To facilitate your education, record the details of your studies (registration, progress monitoring, including any placements with external organisations, calculation and publication of assessments, provision of references).
- Administration of applications (receiving and processing applications, compilation of statistics, assessments of applications).
- To operate security, disciplinary, complaint and quality assurance processes and arrangements.
- To produce statistics and research for internal and statutory reporting purposes.
- To monitor our responsibilities under equalities legislation.

This is not an exhaustive list but sets out the primary reasons the IBTI handles student personal data.

- **Permission forms**

Permission forms are forms that are used to obtain the permission of the data subject for their personal data to be used for a particular purpose. A consent form can be used at the point of collection (as part of the collection text) or later, if the particular purpose was not explicitly mentioned when the data was collected.

- **Processing**

Processing, in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organisation, adaptation or alteration of the information or data,
- retrieval, consultation or use of the information or data,
- disclosure of the information or data by transmission, dissemination or otherwise making it available, or
- alignment, combination, blocking, erasure or destruction of the information or data.



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Processing data includes collecting, using, storing, destroying and disclosing data.

- **Data controller**

Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

In the case of the IBTI, the college is the data controller because it determines the purposes for which, and the manner in which, any personal data are processed or are going to be processed. IBTI is registered as a data controller by the Information Commissioner's Office and has nominated Human Resources manager to operate in its name, who may be contacted directly at the office or via email: gillian.saunders@ibti.org.uk.

- **Data users**

Data users are individual members of staff, volunteers or students, who process data on behalf of the IBTI. Personal data should always be processed according to the Data Protection Principles.

- **Data Processor**

A Data Processor is any person other than an employee of the Data Controller who processes data on behalf of the Data Controller. For example, this could be a "Mail chimp" as a third-party email marketing service to deliver IBTI newsletters via emails.

- **Third Party**

A Third Party is anybody other than the Data Subject, the Human Resources Manager or any other person authorised to process personal data on behalf of the College. At IBTI the Principal's office is responsible for maintaining the College's registration and providing advice and guidance to assist in ensuring compliance with the Data Protection Act.

5. Procedures

The College has a legal responsibility as an institution to operate within the terms of the above Act but each member of staff, volunteer or student could also have a personal liability for any unauthorised disclosure they make. Disclosing information outside the terms of the College Policy could result in disciplinary action. Data held by the College may only be disclosed to third parties in the following circumstances:

a) Internal requests

To College employees who require the information to carry out their normal duties within the scope of their agreed roles.



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b) External requests

With the written authority of the student, staff or volunteer, in accordance with the CollegeFair Processing Statement(s) or Data.

c) Protection Statement(s) - is for one of the "crime and taxation purposes"

- When required by law or statutory instruction*
- When required to prevent or detect crime*
- The assessment or collection of any tax or duty or of any imposition of a similar nature.

As a general rule, the assumption now made is that information may only be given if there is a specific authority to do so, otherwise the concept of confidentiality should apply and the enquirers request declined.

Note: Requests made under headings * must be referred to the manager of the Human Resources Department prior to any information being supplied to the party /authority who have made the request.

5.1 Data Subject Access Request

Under the Data Protection Act, individuals can ask to see the information about themselves that is held on a computer and in some paper records. If an individual wants to exercise this subject access right, they should write to the Human Resources Manager at IBTI. You can download the Subject Access Request form as a Word document. Alternatively you can get hard copies from the Human Resources office. When submitting the form it should be accompanied by the appropriate fee (not exceeding £10). Payment can be made: In cash, by cheque (Please make cheques payable to 'IBTI') or online.

A reply must be received within 40 days as long as the necessary fee has been paid. A data controller should act promptly in requesting the fee or any further information necessary to fulfil the request. If a data controller is not processing personal information of which this individual is the data subject, the data controller must reply saying so.

• References as subject access request

There is no obligation to disclose sensitive personal data in a reference. The Human Resources Manager must use his/her judgement as to whether the information is relevant, and therefore whether it is fair to disclose it.

Confidential references received by the IBTI are not exempt from data subject access requests. However, in deciding whether to disclose information, it is necessary also to consider the data privacy rights of the referee. Information contained in or about a confidential reference need not be provided if the release of the information would identify an individual referee unless:

- the referee has given his or her consent;
- the identity of the referee can be protected by anonymising the information;
- it is reasonable in all the circumstances to release the information without consent;



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The College cannot refuse to disclose information from a confidential reference without giving a reason.

5.2 Specific Obligations regarding data protection policy

Training is provided at the IBTI induction for staff and volunteers and additional guidance will be provided by the Human Resources office whenever needed. Staff and volunteers are expected to ensure they read the guidance available in this policy and are fully conversant with the requirements of this policy.

5.2.1 Processing personal data that is not registered is a criminal offence.

- Staff, volunteers and students should ensure that any data which it is proposed to process are covered by the College Data Protection Notification.
- In the first instance, queries should be raised with Line Managers (i.e. for students - their tutors) and then with the Human Recourses Manager. Issues that cannot be resolved on these levels should be referred to the Principal's office.

5.2.2 Any person for whom personal data is obtained should not be deceived or misled as to the purposes for which such data are held, used or disclosed.

- Staff, volunteers and students must ensure that an indication of the purpose(s) should appear on any form used to collect data, and, where necessary, an explanation given as to why personal data is being collected.
- No unfair pressure should be used in order to obtain any personal data.
- Special care must be taken when collecting sensitive personal data. When proposing to process sensitive personal data confirmation must be obtained from the Human Recourse Manager in order to ascertain that the correct conditions for processing have been met.

5.2.3 All staff, volunteers and students should observe strict control measures when handling all personal data, whether in computerised or paperbased form, and whether it relates to staff,volunteers, students or members of the general public.

- Failure of any member of staff or volunteer to inform College management of a computerised database could result in disciplinary action.
- The holding of a College-related database (computerised or paper-based) outside the College (however temporarily) also falls within these restrictions.

5.2.4 Great care must be taken not to disclose personal data, either intentionally or accidentally, by:

- Only allowing authorised access to computers (eg.by notdisclosing passwords).
- Switching off (or logging off) your computer when you're not using it.
- Keeping doors to rooms containing computers and/or personal papers locked when not in use.



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- Preventing unauthorised information being obtained from a computer screen, computer printout or other paper-based material.
- Ensuring proper disposal of all paper containing personal data, including computer-based printouts.
- Not disclosing personal data over the telephone.
- Ensuring that the written authority of the data subject (person) is obtained when required.
- Only disclosing personal data where you are sure that it is being given to an individual/institution who/that is authorised to receive it.
- Not removing any College hardware or software from the College without prior authorisation.
- Not sending any data outside the EEA without the specific written authority of the data subject (individual).
- Any circumstances where a decision is required on whether to disclose information should be referred in the first instance to the Human Resources Manager and, if it is needed, in consultation with the Principal's office.

5.2.5 It is recognised that on occasions it is necessary for members of staff or volunteers to work from home.

In these circumstances, additional care must be taken with regard to the increased risk of unauthorised disclosure of personal data through theft, loss or access by family members or friends. Members of staff or volunteers must recognise that the conditions enforced by the Data Protection Act within the College environment apply equally when working from home. Great care must be taken to ensure that any personal data removed from the College or accessed from management information sources (whether on laptop, USB memory key or in paper form) is kept secure from theft and viewing by unauthorised persons.

6. Legal Framework

The IBTI will appraise itself of all legislative changes to ensure that it abides by its legal duties under current legislation. It will seek to develop best practice in all its activities and will review this policy annually.

7. Data Protection Complaints Procedure

IBTI aims to comply fully with its obligations under the Act. If you have any questions or concerns regarding IBTI's management of personal data, including your right to access data about yourself, or if you feel IBTI holds inaccurate information about you, please contact IBTI's Human Resources Manager (details above). If you feel that your questions or concerns have not been dealt with adequately or that a subject access request you have made to IBTI has not been fulfilled you can use IBTI's General Complaints procedure. If you are still dissatisfied, you have the right to contact the Information Commissioner's Office, the independent body overseeing compliance with the Act: <https://ico.org.uk/>



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8. Compliance

The co-operation of all concerned is essential for the success of this policy. However, ultimate responsibility for achieving the policy's objectives and for ensuring compliance with the relevant existing legislation is the responsibility of the Board of Trustees and the Directors. Behavior or actions against the spirit and/or the letter of the law on which this policy is based will be considered serious disciplinary matters and may, in some cases, lead to dismissal.

9. Mechanisms for Feedback

Constructive comment for the continued improvement of this policy is welcomed and should be forwarded to the Administrator at admin@ibti.org.uk.

10. References¹ and further information

- The International Bible Training Institute: <https://www.ibti.org.uk/>
- Data Protection Act 1998: <http://www.legislation.gov.uk/ukpga/1998/29/contents>
- Information Commissioner's Office: www.ico.org.uk

¹In addition to taking information from the Data Protection Act 1998 and Information Commissioner's Office, the IBTI has sourced material from the following websites: Sutton College, *Missions and Policies*, [Internet], <https://www.suttoncollege.ac.uk/wp-content/uploads/2011/06/Data-Protection-Policy-Sept-2015.pdf>, and University of Reading, *Data Protection*, [Internet], <http://www.reading.ac.uk/internal/imps/DataProtection/imps-d-p-glossary.aspx#SAR>, accessed 20 March 2017.

