

OLD CENTRALIANS' TRUST
DATA PROTECTION POLICY

3rd October 2018 (Amended 11th June 2019)

Introduction

1. The Old Centralians' Trust ("the Trust") is committed to applying best practice in the management and protection of personal data and information. In recognition of the General Data Protection Regulations, which came into force on 25 May 2018, the Trust has recently reviewed its data management procedures and implemented changes to ensure it fully complies with these regulations.

Scope

2. The Trust collects personal information from the following three stakeholder groups:
 - a. Students of Imperial College London who apply for awards ("Applicants");
 - b. Staff of Imperial College London (or other academic institutions) who submit references to us in support of award applications ("Referees"); and
 - c. Alumni and staff of Imperial College London who administer the Old Centralians' Trust ("Members").

Data Controllers and Data Processors

3. The Data Controllers for the Old Centralians' Trust are its Trustees, which includes the Chairman of the Old Centralians' Trust, the Imperial College Faculty of Engineering Consul, and the President and Honorary Treasurer of the City and Guilds College Association.
4. The Data Processors for the Trust are the Vice Chairman, the Honorary Secretary, the Honorary Treasurer, and the Honorary Secretary of the Old Centralians' Trust.

Lawful bases for collecting personal information

5. The lawful basis for collecting personal information for the purposes of carrying out the effective management of the trust is consent.
6. Applicants are asked to provide their consent for the Trust to collect and hold personal information. This consent is provided by ticking a consent box in the Trust's online application system "OCTAP".
7. Applicants are asked to provide the names and emails of Referees so that the Trust can contact these referees and invite them to submit a reference in support of the Applicant's application. Applicants are responsible for ensuring their Referees consent to passing this information to the Trust.
8. Members (Trustees and other members of the Trust Board) are asked to consent to the Trust handling their personal information when they join the Trust Board.

Data collected and held by the Trust

9. The Trust collects the following personal information from Applicants as part of the award application process:
 - a. Name of the Applicant;
 - b. Name of any other student who would benefit from the award ("other beneficiaries");
 - c. College ID number;
 - d. Email;

- e. Nationality;
 - f. Home address;
 - g. Date of birth;
 - h. Department affiliation;
 - i. Course name; and
 - j. Course start and finish dates.
10. The Trust collects the following personal information from Referees as part of the award application process:
- a. Title;
 - b. Name;
 - c. Email; and
 - d. Department affiliation.
11. The Trust collects the following personal information from Members in support of the administration of its activities:
- a. Title;
 - b. Name;
 - c. Email; and
 - d. Department affiliation.

Rationale for collecting personal information

12. The Trust requires contact information to ensure it can efficiently communicate with Applicants, Referees and Members. This includes Applicants' home addresses, as the Trust may post cheques to successful Applicants' homes.
13. The Trust requires department and course related information to establish the eligibility of the Applicant for an award. Many of the Trust's awards are limited to particular courses and/or departments. The Trust also uses this information to assure itself that its funding is largely being awarded to the departments formally part of the City and Guilds College, in line with the Trust's deeds and objectives.
14. The Trust also collects personal information, including CID and date of birth, to enable it to cross-check with Imperial College to ensure students are registered with the college and are eligible for its awards.

Data deleted by the Trust

15. The Trust deletes the following personal information from Applicants two years after they cease to use the OCTAP system and/or two years after they leave Imperial College:
- a. Names of "other beneficiaries";
 - b. College ID number;
 - c. Email;
 - d. Home address; and
 - e. Date of birth (the year of birth is retained).
16. The Trust deletes delete the following personal information from Referees two year after they cease to use the OCTAP system (measured by one year after the last day the accessed the OCTAP website):
- a. Email.
17. The Trust deletes delete the following personal information from Members when they cease to be Members of the Old Centralians' Trust Board:
- a. Title;
 - b. Name;
 - c. Email; and

- d. Department affiliation.
- 18. The Trust deletes delete the following documents submitted by Applicants and Referees two years after the application has been considered the Old Centralians' Trust Board:
 - a. Confirmation Letters for Postgraduate Travel Awards; and
 - b. References.

Data retained by the Trust

- 19. The Trust records decisions on each application it receives in its Trust Board minutes, which are not made public and can only be accessed by Members. This includes the following personal information, which (by default) is held by the Trust indefinitely:
 - a. Applicant names;
 - b. Applicant nationalities;
 - c. Applicant department affiliations;
 - d. The years Applicants were born (but not the precise date);
 - e. The amount of funding awarded to each Applicant;
 - f. The name of the fund(s) awarded to each Applicant;
 - g. The dates of the decision awards;
 - h. Referees' titles and names;
 - i. Referees' department affiliation;
 - j. The following documents submitted in support of applications:
 - i. Abstracts for Postgraduate Travel Awards;
 - ii. Budgets for all applications; and
 - iii. Reports submitted by Applicants post award.
- 20. The Trust also retains the information listed above, along with the Applicant's course details (name, start and finish dates), in its database indefinitely.

Processes put in place by the Trust to protect data

- 21. Most of the structured data held by the Trust is stored on a secure SQL server, which is hosted by Gradwell (ftp.gradwell.net). This server is protected by encrypted passwords, which are only shared with the individuals tasked by the Trust to maintain its website and data.
- 22. Applicants, Referees and Members can access the OCTAP website using their emails (which acts as a login ID) and passwords. OCTAP passwords are encrypted and cannot be accessed in unencrypted format by any other user.
- 23. Applicants, Referees and Members can view and amend their personal information.
- 24. Members can review applications online if authorised to do so by the Chairman and/or Honorary Secretary. The applications may include some personal information relating to the Applicant and Referee. When an application has been approved or rejected, it can no longer be accessed by Members (other than the Chairman, Vice Chairman, Honorary Secretary and Honorary Treasurer).
- 25. The Chairman, Vice Chairman, Honorary Secretary and Honorary Treasurer can access, amend and delete all data held by the OCTAP system. This enables these officers execute their responsibilities as administrators of the Trust.

Right to be forgotten

- 26. Any user of the OCTAP system may request to have their personal information removed from the Trust's records. They can make this request by writing to the Honorary Secretary. These requests will not normally be refused.