

Christ Theological College

Data Protection Policy

Document Control

Version: 1.0

Date Approved: July 2026

Approved By: CTC Leadership Team

Policy Owner: Academic Dean

Review Cycle: Bi-annually

Next Review Date: July 2029

Applicable Programmes: CTC Micro-credentials (Level 4/5)

1. Introduction and Scope

CTC is the data controller for the personal data it collects about applicants, students, staff, volunteers, donors and contacts. This is CTC's first Data Protection Policy. It sets out how CTC collects, uses, stores and protects personal data, and is written in accordance with the UK GDPR and the Data Protection Act 2018.¹

CTC is a small and developing institution and applies data protection measures that are robust but proportionate to its size and resources. As CTC prepares to deliver microcredentials validated by Union School of Theology (UST), this policy also governs the personal data CTC shares with UST for validation, certification and reporting.

This policy sits alongside CTC's website privacy notice and its Admissions Policy and complements the record-keeping expectations of CTC's Quality Assurance Policy (See CTC Admissions Policy and CTC Quality Assurance Policy). CTC will be registered with the Information Commissioner's Office (ICO) as a data controller.²

2. Data Protection Principles

CTC processes personal data in line with the principles of the UK GDPR.³ Personal data will be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes and not used in incompatible ways;
- adequate, relevant and limited to what is necessary (data minimisation);
- accurate and, where necessary, kept up to date;
- kept no longer than necessary (see the Data Retention Schedule, section 8);
- kept secure, protecting against unauthorised processing, loss or damage.

CTC is accountable for, and can demonstrate, its compliance with these principles.

¹ UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

² Information Commissioner's Office (ICO), the UK data protection regulator - ico.org.uk.

³ UK GDPR, "Article 5 (principles) and Article 5(2) (accountability)." <https://gdpr-info.eu/art-5-gdpr/>

3. Lawful Bases for Processing

CTC does not rely on consent alone. It identifies an appropriate lawful basis for each processing activity:⁴

- Contract - to admit and teach a student, assess their work, and issue their microcredential.
- Legal obligation - for example, tax, employment, safeguarding and health-and-safety records.
- Legitimate interests - for the ordinary administration of the College and, in a balanced way, alumni relations.
- Consent - for optional activities such as photographs, marketing and newsletters, which the individual may withdraw at any time.

As a Christian institution, CTC may process information about religious belief, and may process health information to make reasonable adjustments. These are special category data; CTC processes them only where a condition under Article 9 of the UK GDPR applies - typically explicit consent, or the not-for-profit religious body provision - and with additional care.⁵

4. Responsibilities, Approval and Visibility

- The Data Protection Lead has day-to-day responsibility for this policy and for handling data protection queries and requests.
- The Governing Board approves this policy and reviews it on the cycle stated above.
- All staff and volunteers are responsible for applying this policy in their handling of personal data.
- This policy is published on CTC's website and is included in staff and student induction.

⁴ UK GDPR, Article 6 (lawful bases) and Article 9 (conditions for processing special category data).
<https://gdpr-info.eu/art-6-gdpr/>

⁵ UK GDPR, Article 6 (lawful bases) and Article 9 (conditions for processing special category data).
<https://gdpr-info.eu/art-6-gdpr/>

5. Personal Data of Applicants and Students

5.1 What CTC collects and why

CTC collects contact details, application information, prior qualifications, references, and where relevant, information about a disability or support need (to make reasonable adjustments) and information relevant to participation in a Christian learning community. Data will be used to process applications, deliver and assess microcredentials, provide support, issue certificates, and meet CTC's legal and partnership obligations.

5.2 How CTC stores and protects students data

Student data is held in CTC's Microsoft Sharepoint, an access-controlled institutional system with access limited to named roles and protected by strong passwords and multi-factor authentication. Paper records, if any, are held securely. Data no longer needed is disposed of securely.

5.3 Who CTC shares student data with

Because UST validates and certifies CTC's microcredentials under its ECTE accreditation, CTC will share certain student and assessment data with UST for validation, certification and the annual reporting UST requires. This is a condition of the microcredential and is governed by the partnership agreement based on the CTC-UST Memorandum of Understanding. Whichever trusted third-party processors for example cloud, and any text-matching or virtual-learning provider CTC adopts, each is bound by a data processing agreement. CTC will only share data with other agencies when legally required.

Data	Shared with	Purpose	Lawful basis
Contact, enrolment, progression, assessment and award data	Union School of Theology (UST)	Validation, certification and required partnership reporting	Contract/legal obligation
As required by the	Cloud /VLE/ text-	Hosting, delivery	Contract /legitimate

service	matching provider	and academic-integrity checking	interests
As required by law	[e.g. HMRC, relevant authorities]	Statutory reporting	Legal obligation

5.4 Student responsibilities and rights

Students should keep their details up to date and must not share login credentials. Students have the right to be informed, and to access, rectify, erase, restrict, object to and (where applicable) port their data, and to withdraw consent. Requests should be made to the Data Protection Lead. Students may also complain to the ICO (ico.org.uk).⁶

6. Personal Data of Staff Volunteers

CTC collects staff and volunteer data (application, identity and right-to-work, qualifications, only for consultation, employment and engagement purposes. It is shared only where necessary - for example with CTC's payroll and pension providers and HMRC and each processor is bound by an agreement. Records are kept only as long as needed (see section 8). Staff and volunteers have the same rights set out in section 5.4.

7. Data Breaches

Any actual or suspected personal data breach must be reported to the Data Protection Lead without delay. CTC will assess the breach, take steps to contain and remedy it, record it, and where the breach is likely to result in a risk to individuals, notify the ICO within 72 hours and, where required, the individuals affected.

⁶ Information Commissioner's Office (ICO), the UK data protection regulator - ico.org.uk.

8. Data Retention Schedule

CTC keeps personal data only as long as necessary. Retention reflects good practice and the evidence CTC and UST need for microcredential audit and certification; it is not based on Office for Students (OfS) requirements, as CTC is not an OfS-registered provider.

Record	Retention (minimum)	Responsible role / location	Reason
Enquiries from prospective students	Current year + 1 year	Admissions	Good practice
Unsuccessful applications	Current year + 1 year	Admissions	Good practice
Core student record (enrolment, progression, achievement, certification)	6 years after completion; minimal record of award retained permanently	Registry	References, transcripts, certificate reissue, audit
Assessment submissions (incl. any text-matching submissions)	Current year + 3 years	Registry	Audit and appeals window
Student feedback	Current year + 3 years	Academic oversight body	Quality monitoring
Complaints and appeals	Last action + 6 years	Data Protection Lead	Good practice
Disciplinary - expulsion / other	Permanent / last action + 6 years	Registry	Good practice
Data shared with UST for reporting	As set out in the partnership agreement	Registry	Partnership / certification
Staff and volunteer records	6 years after leaving	Finance/HR	Legal and good practice
Fees and finance records	7 years	Finance	HMRC
Accident / health-and-safety records	[X] years	H&S lead	Legal

Appendix A - Student Privacy Notice

Who we are. Christ Theological College (company no. 13792419; charity no. 1203636), 56 Mulberry Road, Northfleet, Gravesend, Kent, DA11 8PP, is the data controller. Contact the Data Protection Lead at admin@ctcollege.org.

What we collect and why. From your first contact we hold your details to service your enquiry; on application and enrolment we hold your application, qualifications, references and, where relevant, support and confessional information, to process your application, deliver and assess your microcredential, support you, and issue your certificate.

Our lawful bases are contract, legal obligation, legitimate interests and for optional items such as photographs and newsletters, your consent, which you may withdraw at any time.

Who we share with. Union School of Theology (UST) (for validation, certification and reporting), our trusted processors, and other bodies where the law requires.

We do not sell your data.

How long we keep it is set out in the Data Retention Schedule above.

Your rights. You can ask to see, correct, erase, restrict, object to or port your data, and withdraw consent. Contact the Data Protection Lead. You may complain to the ICO (ico.org.uk).

Version Control

Version	Author	Date	Reason for change	EIA check	Approval date
1.0	[author]	[date]	First Data Protection Policy for CTC, developed for microcredentials delivery and the UST partnership	checked	July 2026