



The British Association of Lecturers  
in **English for Academic Purposes**

# Data Protection Policy

## 1. Introduction and Scope

The British Association for Lecturers of EAP (hereafter referred to as BALEAP) is a limited company incorporated in England and Wales and a registered charity (company number 07330723; charity number 1139147). This policy outlines BALEAP's commitment to data protection and compliance with the UK Data Protection Act. The purpose of this policy is to ensure that all personal data held by the charity is processed lawfully, fairly, and transparently, and that the rights of data subjects are protected. This policy applies to all individuals working on behalf of BALEAP, including the Executive Committee team of volunteers, and any employees.

## 2. Data Protection Lead

The BALEAP Administrator ([admin@baleap.org](mailto:admin@baleap.org)) acts as a Data Protection Lead and is responsible for overseeing data protection and leading on any incident investigation and reporting. The BALEAP Administrator will also ensure that all volunteers are made aware of their data protection responsibilities.

## 3. Data Protection

Data protection is the practice of safeguarding personal information by applying data protection principles and complying with the Data Protection Act. The Data Protection Act is a UK law that regulates the processing of personal data. The UK Information Commissioner's Office (ICO) provides guidelines on data protection that BALEAP will follow, using the following terms and principles:

**UK GDPR:** The UK General Data Protection Regulation, which outlines the rules for processing personal data in the UK.

**Data Processor:** An individual or organisation that processes personal data on behalf of a data controller.

**Data Controller:** An individual or organisation that determines how and why personal data is processed.



**Data Subject:** An individual whose personal data is being processed.

**Processing:** Any operation performed on personal data, including collection, storage, use, and disclosure.

**Personal Data:** Any information that can identify a living individual, such as name, address, or email address.

**Sensitive Personal Data:** Personal data that requires extra protection, such as health information or ethnic origin.

**Direct Marketing:** Any communication aimed at promoting a product or service directly to an individual.

**PECR:** The Privacy and Electronic Communications Regulations, which govern electronic direct marketing.

**Valid Consent:** Consent given freely, specifically, and informed, and can be withdrawn at any time.

**Legitimate Business Purpose:** A lawful reason for processing personal data that is necessary for the legitimate interests of the data controller or a third party.

## 4. Data protection principles

BALEAP will comply with the Data Protection Act by observing the following principles:

- Data is processed lawfully, fairly and in a transparent manner.
  - We are clear that our collection of data is legitimate and we have obtained consent to hold an individual's data, where appropriate.
  - We are open and honest about how and why we collect data and individuals have a right to access their data.
- Data is collected for specified, explicit and legitimate purposes and not used for any other purpose, without the consent of the person whose data it is.
  - The data we collect is adequate, relevant and limited to what is necessary.
  - We ensure that what we collect is accurate and have processes in place to ensure that data which needs to be kept up-to-date is, volunteer, staff, individual and institutional member records.
  - Any mistakes are corrected promptly.
- Data is kept for no longer than is necessary. We understand what data we need to retain, for how long and why, including both hard copy and electronic data.
  - We have processes in place to ensure data no longer needed is destroyed.



- Data is processed to ensure appropriate security, not only to protect against unlawful use, but also loss or damage.
  - o The data we hold is kept securely, so that it can only be accessed by those who need to do so, and is recoverable with adequate data back-up processes.

For detailed guidance on the specific data we collect and its purpose, and the processes we use for collecting this data, please refer to our Privacy Notice.

## 5. Individual Rights

We recognise that individuals' rights include the right to be informed, of access, to rectification, erasure, restrict data processing, and to object to use of their data.

## 6. Use of Imagery/Video

All imagery is protected by copyright and will only be used with the consent of the owner, usually the person who took the image, and from the individuals in images of individuals and small groups.

## 7. Data Breach

A breach is more than only **losing** personal data. It is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

We will investigate the circumstances of any loss or breach, to identify if any action needs to be taken. Action might include changes in procedures, where there will help to prevent a re-occurrence or disciplinary or other action, in the event of negligence.

We will notify the ICO within 72 hours, of a breach if it is likely to result in a risk to the rights and freedoms of individuals. If unaddressed such a breach is likely to have a significant detrimental effect on individuals. For example:

- Result in discrimination.
- Damage to reputation.
- Financial loss.
- Loss of confidentiality or any other significant economic or social disadvantage.

## 8. Special Category Data

Special category (sensitive) data is more sensitive, and so needs more protection. For example, information about an individual's race, ethnic origin, politics, religion, trade union



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membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.

BALEAP will not collect any special category data.

## 9. Data Retention

Our data will only be kept for as long as there is an administrative need to do so in order to enable our charity to carry out its functions, or for as long as it is required to demonstrate compliance for audit purposes or to meet legislative requirements.

For detailed guidance on our retention periods for specific data, please refer to our Privacy Notice.

### Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
1	BALEAP Exec	6th March 2025		2028