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Data Protection Policy

1.0 Purpose and Scope

1.1 Talented Training Ltd is committed to conducting its business in accordance with all applicable Data Protection laws and regulations, in line with the highest standards of ethical conduct.

This policy, together with our Data Protection Framework, provides a system for ensuring that the organisation meets its obligations under UK/EU General Data Protection Regulations and the Data Protection Act 2018 (DPA 18). It applies to all processing of personal data carried out by company, including processing undertaken by partners, contractors, and processors. For clarity, throughout this policy document reference made to Talented Training Ltd, includes all companies/entities/divisions within the business.

1.2 Talented Training Ltd collects and processes personal and special category (sensitive) data from our customers, employees, and other stakeholders. When processing personal data Talented Training Ltd complies with data protection legislation guided by the six data protection principles to ensure that data is:

- Processed fairly, lawfully and in a transparent manner
- Used only for limited, specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary
- Accurate and, where necessary, up to date
- Not kept for longer than necessary; and
- Kept safe and secure.

1.3 Personal Data covered by Data Protection Legislation and this policy.

EU/UK GDPR definition of 'personal data' includes any information which identifies either directly, or indirectly an identifiable natural living person.

Pseudonymised personal data is also covered by this legislation and policy; however, anonymised data is not regulated by data protection laws, providing that the anonymisation is not reversible.

Special Category Data due to its sensitive nature must be provided with additional protection, this information is related to:

- Race and ethnic origin
 - Religious or philosophical beliefs
 - Genetic Data
 - Health data
 - Criminal data (relating to convictions and offences)
 - Political opinions
 - Trade union membership
 - Biometric ID data
 - Sexual life and/or sexual orientation
- (Although not classified as special category data under GDPR requires the same level of protection).

2.0 Policy Aims

2.1 To ensure that Talented Training Ltd meets its statutory requirements under data protection laws, and that all personal and special category data is processed compliantly.

2.2 That staff are aware of their responsibilities regarding Data Protection and have access to the necessary policies, operational procedures, and guidance.

2.3 To provide assurance that Talented Training Ltd has appropriate technical and organisational measures in place for compliance with data protection law.

This policy should be read in conjunction with the following:

Information Security Policy
Individual User Agreement
Classification Policy
Security Incident Management Procedure
Internet Cookie Notice
Archiving Procedure
Emailing of Sensitive Data Guidance

Data Protection Framework
Data-Document Retention and Archiving Policy
Security Incident Management Policy
Privacy Notices
Data Retention Schedules
Data Subject Rights Procedure
Event Reporting Procedure

3.0 Responsibilities

3.1 Management and Employee Responsibilities Senior management must ensure that all employees are aware of and comply with their Data Protection responsibilities as outlined in this policy, and by extension the Data Protection Framework and supporting policies and procedures. It is the responsibility of managers to ensure their staff are fully aware of their responsibilities in managing personal data and its associated risks and have access to this policy and supporting documents. It is the responsibility of all employees to undertake data protection training annually and to adhere to this and related policy documents and guidance when processing personal data.

The Data Protection Officer (DPO) is primarily responsible for assessing and monitoring compliance with the UK/EU GDPR and other data protection laws and for making recommendations to improve compliance. This will include reviewing and updating data protection policies, awareness-raising, training, and audits. The DPO is the contact point for Supervisory Authorities (ICO/DPC), including Article 36 Consultations- Data Protection Impact Assessment referrals.

4.0 Our Commitment

4.1 Compliance Monitoring

We undertake assurance activities, built into the groupwide Assurance plan on a regular basis. These include,

External ISO27001 certification assessments
Internal assurance activities and control testing

Internal ISO27001 audits
Commission audits and inspections

4.2 Data Protection by Design and Default

We consider privacy at the design phase of any system, service, or processing and limit personal data processing to only what is necessary. We assess processing of personal data where perceived to be high risk and where necessary complete DPIAs (Data Privacy Impact Assessments) before implementation of new systems or processing.

4.3 Data Subject Rights

We have clear processes to handle data subject access requests and other information rights requests.

4.4 Privacy Notices

We publish privacy notices on our website, which are regularly reviewed and updated. Employees are provided with their own privacy notice.

4.5 Records of Processing Activities

We maintain records of all processing activities in respect of personal and special category data.

4.6 Information Asset Registers

Are maintained for each business area/division.

4.7 Staffing Training

Mandatory Data Protection Training is completed on an annual basis, with role specific training provided as necessary.

4.8 Data Breaches and Information Security Incident

We have clear processes for reporting and management.

4.9 Contracts

Our Information Security, Procurement and Contract Departments Oversee contracts for compliance with data protection laws.

4.10 Policies and Procedures

We produce policies and procedures to provide guidance on information security, information management, and compliance with data protection legislation.

4.11 0 Data Retention and Disposal

Talented Training Ltd adheres to the data minimisation and storage limitation principles of the GDPR. In conjunction with our contractual obligations, we follow the policies of our commissioners relating to document retention. We will obtain authorisation from the appropriate body prior to the destruction of any documents.

For further information on how we process personal data please refer to our Privacy Statement.

5.0 Document Control

Below is the change history and document 'sign off' information.

5.1 Version Control

Record of Amendments		
Version Number	Date of Issue	Detail of Change
V1.0	Mar 2024	Policy Re-write and issue.

5.2 Next Review Date

The next scheduled review of this document will be March 2025 or earlier if there is a need for an additional review.

5.3 Document Authorised

Document Authorisation		
Name and Position	Signature	Date
Mona Palmer Quality and Curriculum Manager	Mona Palmer	25 March 2024