

Data Protection, Retention and Privacy Policy

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Data Protection, Retention and Privacy Policy

1.0 Purpose

When we process your personal data we comply with all applicable data protection legislation, including the UK GDPR and the Data Protection Act 2018.

Your personal data includes all the information we hold that identifies you or is about you. More information about the types of personal data we process about you is set out below.

Everything we do with your personal data counts as processing it, including collecting, storing, amending, transferring and deleting it.

1.1 Scope

This data protection and privacy policy provides information about the personal data we process about you, why we process it and how we process it. It applies to all processing of personal data carried out by the company, including processing undertaken by partners, contractors, and processors.

2.0 Data Processing

We will process the information you provide in the application form you submit for the course. We collect personal data we need such as (but not limited to):

- Full name
- Address
- Email address
- Date of birth
- Gender
- National Insurance Number
- Citizenship Status

We may also ask for sensitive personal data, for example any health or special educational needs but you can choose to opt out of providing this information. If government funding is available for your course, we collect personal data from you to make sure you are eligible for that funding. Contact details may also be used if we ever need to contact you in relation to the course or training provision.

We may use your personal information:

- To register you as a learner and allow you to complete the necessary assessments as well as any other administrative purposes.
- To carry out reviews and appeals
- To communicate with you as necessary including following up on work activities after course completion
- To analyse and improve our services
- Auditing purposes or to satisfy legal or contractual obligations

- Where there is a legitimate interest in us doing so
- Where the above reasons have not been satisfied and/or you have provided consent for us to use your personal information in a certain way.

3.0 Storage of Personal Information

All paper records will be scanned in and stored electronically. Paper records will be kept for 3 months after completion. In general, unless still required in connection with the purpose(s) for which it was collected and/or processed, we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time.

4.0 Sharing of Personal Information

We may need to share your personal information with the below third parties:

- Awarding Organisations who provide the qualification and regulators, such as Ofsted
- The national Learning Record Service (LRS)
- Third-party software providers that we use to process and analyse information/feedback
- West Yorkshire Combined Authority (WYCA)
- Any other regulatory or legal duty to do so

5.0 Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

Right of Access - You have the right to ask us to confirm that we process your personal data, as well as access to and copies of your personal data.

Right of Erasure - at your request we will delete your personal information from our records as far as we are required to do so. In many cases we would propose to suppress further communications with you, rather than delete it.

Right of Rectification - if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.

Right to Restrict Processing - you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage. Or you have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made. Or if you are exercising your right to rectification.

Right to data portability - You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you can transmit the personal data to another data controller.

Right to object - In some circumstances, you are entitled to object to us processing your personal data.

Automated decision making

Automated decision-making means deciding solely by automated means without any human involvement.

Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website - <https://ico.org.uk/concerns/>.

6.0 Document Control

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

6.1 Version Control

Record of Amendments		
Version Number	Date of Issue	Detail of Change
V1.0	Mar 2024	Policy Re-write and issue.
V2.0	Mar 2025	Policy update.

6.2 Next Review Date

The next scheduled review of this document will be March 2026 or earlier if there is a need for an additional review.

6.3 Document Authorisation

Document Authorisation		
Name and Position	Signature	Date
Laura Jambawai Quality and Adult Skills Lead	LJambawai	26 March 2025