GDPR AND DATA PROTECTION POLICY 2026

Policy Statement

Straight A Training is committed to protecting the privacy, confidentiality, integrity and security of personal information entrusted to us by learners, apprentices, employees, employers, contractors and other stakeholders.
We recognise the importance of handling personal data lawfully, fairly and transparently and are committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
This policy outlines how Straight A Training collects, processes, stores, shares and protects personal information and sets out the responsibilities of all staff in relation to data protection.

1. Purpose

The purpose of this policy is to:

- Ensure compliance with UK data protection legislation.
- Protect the rights and freedoms of individuals.
- Safeguard personal and sensitive information.
- Promote good information governance practices.
- Ensure staff understand their data protection responsibilities.
- Minimise the risk of data breaches.

2. Scope

This policy applies to:

- Employees.
- Directors.
- Tutors and Assessors.
- Contractors and Consultants.
- Learners and Apprentices.
- Any third party processing data on behalf of Straight A Training.
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The policy applies to all personal data processed by Straight A Training in both electronic and paper formats.

3. Definitions

Personal Data

Any information relating to an identified or identifiable living person.
This may include:

- Name
- Address

- Telephone number
- Email address
- Date of birth
- National Insurance number
- Employment details
- Educational records
- Photographs
- Identification documents

Special Category Data

Personal data requiring additional protection, including:

- Ethnic origin
- Religious beliefs
- Health information
- Disability information
- Biometric data
- Sexual orientation

4. Data Protection Principles

Straight A Training will comply with the seven principles of UK GDPR.
Personal data will be:

a. Lawful, Fair and Transparent

Data will be processed lawfully and individuals will be informed about how their data is used.

b. Purpose Limited

Data will only be collected for specified and legitimate purposes.

c. Data Minimised

Only data that is necessary for business and regulatory purposes will be collected.

d. Accurate

Reasonable steps will be taken to ensure personal data remains accurate and up to date.

e. Storage Limited

Data will not be retained longer than necessary.

f. Secure

Appropriate technical and organisational measures will be implemented to protect personal information.

g. Accountable

Straight A Training will be able to demonstrate compliance with data protection requirements.

5. Lawful Bases for Processing

Straight A Training may process personal data under one or more of the following lawful bases:

- Contractual necessity.
- Legal obligation.
- Legitimate interests.
- Consent.
- Vital interests.
- Public task (where applicable).

The lawful basis for processing will be identified before data is collected or processed.

6. Responsibilities

Directors

The Directors have overall responsibility for ensuring compliance with data protection legislation and organisational policies. The Directors will:

- Promote a culture of data protection compliance.
- Ensure adequate resources are available.
- Ensure data protection risks are managed appropriately.
- Review data protection performance regularly.

Managers

Managers are responsible for:

- Implementing this policy.
- Ensuring staff understand their responsibilities.
- Monitoring compliance.
- Reporting breaches and concerns promptly.

Employees

All employees are responsible for:

- Following this policy.
- Protecting personal information.
- Reporting suspected breaches immediately.
- Using organisational systems appropriately.
- Maintaining confidentiality.

Failure to comply may result in disciplinary action.

7. Collection and Use of Personal Data

Straight A Training collects personal information for legitimate business purposes including:

- Recruitment and employment.
- Apprenticeship delivery.
- Learner enrolment and support.
- Funding compliance.
- Safeguarding.
- Health and safety.
- Quality assurance.
- Communication with learners and employers.

Individuals will be informed about how their data is collected and used through privacy notices.

8. Data Sharing

Personal data may be shared where lawful and necessary.
This may include:

- Funding agencies.
- Awarding organisations.
- Regulatory bodies.
- End-point assessment organisations.
- Employers.
- Government departments.
- External auditors.
- Safeguarding agencies where required.

Data will only be shared where appropriate safeguards are in place.

9. Data Security

Straight A Training will take appropriate measures to protect personal information.
Measures include:

- Secure passwords and authentication controls.
- Encrypted devices where appropriate.
- Access controls based on business need.
- Secure cloud-based systems.
- Staff training and awareness.
- Secure disposal of confidential information.

All staff are responsible for protecting information they access or process.

10. Data Retention

Personal data will be retained only for as long as required by:

- Legal requirements.
- Funding requirements.
- Regulatory obligations.
- Contractual obligations.
- Legitimate business needs.

A Data Retention Schedule will define retention periods for different categories of information.
When data is no longer required, it will be securely destroyed or anonymised.

11. Individual Rights

Individuals have the following rights under UK GDPR:

Right to be Informed

To know how personal data is collected and used.

Right of Access

To request access to personal information held about them.

Right to Rectification

To request correction of inaccurate information.

Right to Erasure

To request deletion of information where applicable.

Right to Restrict Processing

To limit how personal information is processed.

Right to Data Portability

To receive personal data in a transferable format where applicable.

Right to Object

To object to certain types of processing.

Rights Relating to Automated Decision Making

To challenge decisions made solely by automated means.
Requests relating to these rights should be made in writing.

12. Subject Access Requests (SARs)

Individuals may request access to their personal data.
Straight A Training will:

- Verify the identity of the requester.

- Respond within one calendar month where required.
- Provide information in an accessible format.
- Record all requests and responses.

13. Data Breaches

A personal data breach may include:

- Loss of personal information.
- Unauthorised disclosure.
- Accidental deletion.
- Cyber security incidents.
- Loss or theft of devices.

Any actual or suspected breach must be reported immediately to senior management.
Straight A Training will:

- Investigate the breach.
- Assess risks.
- Take corrective action.
- Notify the Information Commissioner's Office (ICO) where required.
- Inform affected individuals where appropriate.

14. Remote Working and Information Security

Employees working remotely must:

- Keep devices secure.
- Use approved systems and software.
- Protect passwords.
- Prevent unauthorised access.
- Secure paper records when not in use.

Confidential information must not be shared through unsecured methods.

15. Training and Awareness

All staff will receive appropriate training on:

- Data protection requirements.
- Cyber security awareness.
- Confidentiality obligations.
- Information handling procedures.
- Reporting data breaches.

Training will be refreshed regularly.

16. Safeguarding and Data Protection

Data protection requirements do not prevent the sharing of information where there is a legitimate safeguarding concern.

Straight A Training may share information where necessary to:

- Protect a child.
- Protect an adult at risk.
- Prevent serious harm.
- Comply with legal obligations.

Safeguarding concerns should be reported to:

Designated Safeguarding Lead (DSL)

Jayne Raftery
Email: jayne@straighta.co.uk

Deputy Designated Safeguarding Leads

Linda Somerville
Email: linda@straighta.co.uk
Caroline Mendes
Email: caroline@straighta.co.uk
Beata Kuczynska
Email: beata@straighta.co.uk

17. Monitoring and Compliance

Straight A Training will regularly review:

- Data protection practices.
- Security measures.
- Breach records.
- Training completion.
- Legislative developments.

Audits may be conducted to ensure compliance.

18. Complaints

Individuals who are dissatisfied with how their data has been handled should first contact Straight A Training.
If concerns cannot be resolved, individuals have the right to complain to the Information Commissioner's Office (ICO).

19. Policy Review

This policy will be reviewed annually or sooner if:

- Legislation changes.

- Regulatory requirements change.
- Significant data breaches occur.
- Organisational changes require review.

Approval

Organisation: Straight A Training
Policy Owner: Jayne Raftery
Approved By: Senior Leadership Team
Version: 1.0
Effective Date: April 2026
Review Date: April 2027
Next Review: Annually