

Central Training Group

Data Protection Policy

2025 – 2026

1. Introduction

Central Training Group (“the Organisation”) is committed to protecting personal data and processing it in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant guidance issued by the Information Commissioner’s Office (ICO).

This policy applies to all staff, learners, contractors, volunteers, governors, and third parties who process personal data on behalf of the Organisation.

2. Scope

This policy covers all personal data processed by the Organisation in both electronic and paper formats, including data relating to learners, staff, applicants, employers, clients, and other stakeholders.

3. Definitions

Personal Data: Any information relating to an identified or identifiable living individual.

Special Category Data: Personal data revealing racial or ethnic origin, health data, biometric data, etc.

Data Controller: Central Training Academy.

UK GDPR: The retained UK version of the General Data Protection Regulation, as amended by the Data (Use and Access) Act 2025.

4. Lawful Basis for Processing

The Organisation processes personal data under the following lawful bases:

- Article 6(1)(a) – Consent (limited circumstances only)
- Article 6(1)(b) – Contract
- Article 6(1)(c) – Legal obligation
- Article 6(1)(e) – Public task

- Article 6(1)(f) – Legitimate interests (including recognised legitimate interests where applicable under the Data (Use and Access) Act 2025)

Special category data is processed under Article 9(2)(g), (h), or (j), and criminal conviction data under Schedule 1 of the Data Protection Act 2018.

5. Data Protection Principles

Personal data shall be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only as long as necessary
- Processed securely

6. Rights of Individuals

Individuals have rights including:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making and profiling (with eased restrictions under the Data (Use and Access) Act 2025 where no legal or similarly significant effects are produced)

Requests must be responded to within one calendar month.

7. Children and Vulnerable Adults

The Organisation recognises children's and vulnerable adults' data as high risk and applies enhanced safeguards in line with safeguarding legislation and ICO guidance.

8. Data Protection Officer

The Data Protection Officer (DPO) is responsible for advising on compliance, handling data subject requests, breaches, and liaising with the ICO.

Contact: DPO@centraltraininggroup.com

9. Staff Responsibilities

All staff must:

- Process data securely and confidentially
- Follow organisational procedures
- Report data breaches immediately
- Complete mandatory data protection training

10. Data Security

Appropriate technical and organisational measures are in place including:

- Access controls
- Encryption
- Secure disposal
- Password management

11. Data Breaches

All suspected breaches must be reported immediately to the DPO. The ICO will be notified within 72 hours where required.

12. Data Protection Impact Assessments (DPIAs)

DPIAs will be carried out for high-risk processing, including CCTV, safeguarding, and monitoring systems.

13. Retention and Disposal

Data is retained in line with the Document Retention and Disposal Schedule and securely destroyed when no longer required.

14. Marketing and Media

Consent is required for marketing and media use. Consent can be withdrawn at any time without detriment.

15. Complaints Handling

In accordance with the Data (Use and Access) Act 2025, a formal complaints process will be implemented by summer 2026 for handling data protection complaints. Complaints should be directed to the DPO in the first instance.

16. Review

This policy is reviewed annually or when legislation changes.

Useful Links: Information Commissioner Office: www.ico.gov.uk