

Central Training Group

Privacy Notice

2025 – 2026

1. Purpose

This Privacy Notice explains how Central Training Group (“the Organisation”) collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and amendments introduced by the Data (Use and Access) Act 2025 (DUAA).

2. Who This Notice Applies To

This notice applies to:

- Learners and applicants
 - Apprentices
 - Staff and job applicants
 - Employers and commercial clients
 - Website users and enquirers
 - Contractors and subcontractors
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3. Data Controller

Central Training Group is the Data Controller.

Contact details:

Data Protection Officer (DPO)

Email: DPO@centraltraininggroup.com

4. Personal Data We Collect

We may collect:

- Identity data (name, date of birth, ULN, NI number)
 - Contact details (address, email, telephone)
 - Education and employment records
 - Attendance and progress data
 - Equality and diversity data
 - Financial and funding-related data
 - Safeguarding and welfare information
 - Special category data (health, SEN, ethnicity)
 - Criminal conviction data (where legally required)
 - CCTV images
 - Website usage data
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5. How We Collect Data

Data is collected:

- Directly from individuals
 - From employers, schools, awarding bodies
 - From funding bodies such as DfE and Ofsted
 - Via our website, systems, and CCTV
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6. Lawful Bases for Processing

We process data under:

- Legal obligation
- Public task
- Contract
- Consent (only where appropriate)
- Legitimate interests, including recognised legitimate interests (e.g., for preventing and detecting crime, safeguarding vulnerable individuals, or responding to emergencies, without requiring a balancing test where the processing is necessary; for other legitimate interests, such as direct marketing or intra-group administrative transfers, a balancing test is applied)

Special category data is processed under Article 9 UK GDPR.

Where our services (including online platforms) are likely to be accessed by children (e.g., learners aged under 18), we take into account their specific needs, including higher protection standards, differing developmental stages, and reduced awareness of processing risks, in line with the Age Appropriate Design Code.

7. How We Use Personal Data

We use data to:

- Deliver education and training
 - Meet funding and statutory requirements
 - Safeguarding learners
 - Monitor performance and quality
 - Provide learning support
 - Process payments and bursaries
 - Prevent and detect crime
 - Communicate with individuals
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8. Data Sharing

We may share data with:

- DfE & Ofsted
 - Awarding bodies
 - Local authorities
 - Employers (where applicable)
 - Police or regulators (where legally required)
 - Parents/guardians for learners aged 16–18
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9. International Transfers

We do not routinely transfer personal data outside the UK. Where this is required, appropriate safeguards will be in place.

10. Data Retention

Data is retained in line with our Document Retention Schedule:

- Applicants: 6 months
- Learners: 7 years from leaving
- Staff: 6 years after employment ends

11. Individual Rights

You have the right to:

- Access your data (we will conduct reasonable and proportionate searches; the response timeline may pause if we require additional information to verify your identity or clarify the request)
- Rectify inaccuracies
- Request erasure (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent (where used)

Requests should be made to the DPO.

12. Automated Decision-Making

We do not carry out automated decision-making that produces legal or significant effects.

13. Marketing and Media

We only use personal data for marketing or media where consent has been given. Consent can be withdrawn at any time.

For website analytics and non-intrusive tracking (e.g., audience measurement cookies), we may rely on exemptions under PECR where no consent is required, provided the processing is limited and does not involve profiling

14. Data Security

We apply appropriate technical and organisational measures to protect personal data.

15. Complaints

If you have concerns, contact the DPO first. We maintain a formal complaints process for data protection issues. You can submit complaints electronically via our online form at [website link] or in writing. We will acknowledge your complaint within 30 days and respond without undue delay, taking appropriate steps to investigate and inform you of the outcome. You must use this internal process before escalating to the ICO.

You may also complain to the Information Commissioner's Office at www.ico.org.uk.

16. Changes to This Notice

This notice is reviewed regularly and updated as required.