



## Data Protection and Privacy

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### Policy & Procedure 2025

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| Date of Review:      | 27/10/2025                                                                          |
| Date of next Review: | 26/10/2026                                                                          |
| Approved by:         | Anthony Lovell                                                                      |
| Position:            | Head of Quality and Performance                                                     |
| Signature:           |  |

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# Data Protection and Privacy

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## 1. Purpose

This policy explains how Vision Rehabilitation Training Ltd (“VRT”) collects, processes, stores, and protects personal information relating to apprentices, employers, employees, contractors, and other stakeholders.

VRT is committed to ensuring that all personal data is handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. Scope

This policy applies to:

- All personal and special category data processed by VRT.
- All staff, contractors, and partner organisations acting on behalf of VRT.
- All systems, platforms, and paper-based records used in the delivery of training and apprenticeship services.

## 3. Principles of Data Protection

VRT adheres to the seven key principles of UK GDPR:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

## 4. Lawful Bases for Processing

VRT processes personal data under the lawful bases of contractual obligation, legal obligation, public task, legitimate interests, consent, and vital interests.

## 5. Categories of Data Processed

Refer to the Document & Data Retention Policy 2025 for detailed categories. These include:

- Personal data: name, contact details, employment, and learning records.
- Special category data: health, disability, ethnicity, religion, and safeguarding information.
- Operational data: attendance, assessment, and communications records.

## 6. Data Collection and Use

VRT collects data to deliver training, meet ESFA and Ofsted requirements, support safeguarding, manage quality assurance, and communicate with stakeholders. Data will never be sold or used for marketing without consent.

## 7. Data Sharing

Personal data may be shared with ESFA, Ofsted, awarding bodies, employers, statutory agencies, and technology partners under strict confidentiality and data-sharing agreements.

## **8. Data Security**

- Electronic data is held in encrypted systems and password-protected files.
- Paper records are kept in locked cabinets.
- Access is restricted to authorised personnel.
- Regular backups and audits are performed.
- AI transcription tools are used only for summarisation and not for automated decisions.

## **9. Individual Rights**

Under UK GDPR, individuals have the right to access, rectify, erase, restrict, or object to processing of their data, and to complain to the ICO. Requests will be handled within one calendar month.

## **10. Data Breach Management**

Any suspected or actual data breach must be reported to the Data Protection Lead (DPL). Serious breaches will be reported to the ICO within 72 hours.

## **11. Responsibilities**

- Data Protection Lead (DPL): Oversees compliance and responds to data requests.
- All staff and contractors: Must follow this policy and complete training.
- Apprentices and employers: Must provide accurate information and update VRT of any changes.

## **12. Policy Review**

This policy is reviewed annually or sooner if required by regulation or operational change.

## **Contact**

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