

Data Protection Policy

2026-2027

Organisation	Century Training Academy Ltd
Document type	Policy
Version	2.0 updated compliance version
Reviewed	20 August 2026
Next review	20 August 2027

1. Purpose

Century Training Academy Ltd processes personal data about learners, parents/carers, staff, contractors, commissioners, visitors and other individuals. This policy sets out how personal data is collected, used, stored, shared and protected in accordance with UK GDPR and the Data Protection Act 2018.

2. Data Controller

Century Training Academy Ltd is the Data Controller for personal data it collects and uses for its own purposes. In some commissioned arrangements, data sharing or processing responsibilities may also be defined by a contract or data sharing agreement with a school, local authority or awarding organisation.

3. Data Protection Principles

- Lawfulness, fairness and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality.
- Accountability.

4. Types of Personal Data

- Learner identity, contact, attendance, progress, behaviour and assessment information.
- Safeguarding, SEND, EHCP, risk assessment and welfare information.
- Health, medication, allergy and disability information.
- Parent/carer and emergency contact details.
- Staff recruitment, HR, training, DBS and payroll information.
- CCTV images where CCTV is used.
- Complaints, incidents, accident and investigation records.

5. Lawful Bases

The academy may rely on different lawful bases depending on the activity, including contract, legal obligation, legitimate interests, vital interests, public task where applicable under a specific commissioning/legal arrangement, and consent where consent is genuinely freely given and appropriate.

6. Privacy Notices

Learners, parents/carers, staff and relevant individuals must be provided with privacy information explaining what data is collected, why, lawful bases, who it is shared with, retention periods and rights.

7. Sharing Information

Data may be shared with schools, local authorities, safeguarding partners, police, awarding organisations, health professionals, insurers, legal advisers or regulators where lawful, necessary and proportionate. Safeguarding information may be shared without consent where necessary to protect a child.

8. Subject Access Requests and Individual Rights

Individuals have rights under data protection law, including the right of access. Subject Access Requests must be responded to without undue delay and within one month, unless an extension is lawful due to complexity or multiple requests. Fees must not be charged routinely; a reasonable fee may only be considered where the request is manifestly unfounded, excessive or for further copies.

9. Data Security

- Secure passwords and appropriate access controls.
- Locked storage for paper records.
- Limited access based on role and need to know.
- Secure transfer of sensitive information.
- Encryption or password protection for sensitive electronic files where appropriate.
- Regular review of access permissions.
- Clear desk and secure disposal arrangements.

10. Personal Data Breaches

Any suspected loss, unauthorised disclosure, cyber incident, misdirected email, missing paperwork or inappropriate access must be reported immediately to the Data Protection Lead. The academy will assess risk and decide whether the ICO must be notified within 72 hours and whether affected individuals must be informed.

11. Retention

Personal data must not be kept for longer than necessary. A retention schedule must be maintained for learner records, safeguarding records, HR records, assessment records, CCTV, accident records, complaints and finance/contract records.

12. CCTV

CCTV processing must be covered by the CCTV Policy, signage, privacy information, DPIA and Legitimate Interests Assessment. CCTV footage will normally be retained for up to 30 days unless retained for a documented incident or lawful purpose.

Record Keeping

Records created under this document must be accurate, factual, dated and stored securely. Access must be limited to staff with a legitimate operational, safeguarding, health and safety, quality assurance or legal reason to view the information. Records must be retained in line with Century Training Academy Ltd's retention schedule and UK GDPR requirements.

Monitoring and Review

This document will be reviewed at least annually, with the next scheduled review on 20 August 2027. It will also be reviewed sooner if legislation, statutory guidance, awarding body requirements, local authority expectations, premises, provision or operating arrangements change.

Key Guidance and Linked Requirements

- Keeping Children Safe in Education 2026 (DfE), in force from 1 September 2026.
- Non-school Alternative Provision: Voluntary National Standards (DfE).
- UK GDPR and Data Protection Act 2018.
- Equality Act 2010.
- Health and Safety at Work etc. Act 1974 and relevant HSE guidance.
- ICO guidance on subject access requests and special category data.

Sign Off

Name	Stephen Black
Position	Director
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