



Policy: Clint Stamper Training Ltd – Data Protection Policy

Written by: Clinton Stamper

Responsible Person: Clint Stamper

Approval date: 7/7/26

Date of next review: 7/7/27

Data Protection Policy

1. Policy Statement

Clint Stamper Training Ltd (CST) is committed to protecting the personal data of learners, staff, customers 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 explains how CST collects, uses, stores and protects personal data in the course of delivering training and associated services.

2. Scope

This policy applies to all personal data processed by CST, whether held electronically, on paper, or in any other format. It applies to all staff, contractors and associates who process personal data on behalf of CST.

3. Data Protection Principles

CST processes personal data in accordance with the 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
- Kept for no longer than necessary
- Processed securely and protected against unauthorised access, loss or damage

4. Lawful Basis for Processing

CST processes personal data under one or more lawful bases, including:

- Performance of a contract (e.g. training delivery and certification)
- Legal obligation (e.g. awarding body or regulatory requirements)
- Legitimate interests (e.g. quality assurance, safeguarding and audit)
- Consent (where required)

Details of lawful bases are provided through CST privacy notices where appropriate.

5. Types of Data Collected

CST may collect and process the following types of personal data:

- Learner registration and enrolment details
- Attendance and assessment records
- Certification information
- Contact details
- Learner feedback and evaluation information
- Equality, diversity and reasonable adjustment information (where applicable)

Special category data is only collected where necessary and is handled with additional safeguards.

6. Data Storage and Security

CST takes appropriate technical and organisational measures to protect personal data, including:

- Secure electronic systems with restricted access
- Password protection and controlled user permissions
- Secure storage of paper records
- Regular review of data access arrangements

Personal data is only accessible to authorised individuals who require access for legitimate business purposes.

7. Data Retention

Personal data is retained only for as long as necessary to meet business, legal, regulatory and awarding body requirements. CST follows defined retention periods and securely disposes of data once it is no longer required.

8. Data Sharing

Personal data may be shared with relevant third parties where necessary, including awarding bodies, regulators or funding bodies. CST ensures that any third parties processing data on its behalf do so in compliance with data protection legislation.

CST does not transfer personal data outside the UK unless appropriate safeguards are in place.

9. Individual Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure of data (where applicable)
- Restrict or object to processing
- Request data portability

Requests should be made in writing and will be handled in line with statutory timescales.

10. Data Breaches

Any actual or suspected data breach must be reported immediately to CST management. CST will investigate breaches promptly and report to the Information Commissioner's Office (ICO) where required.

11. Responsibilities

Overall responsibility for data protection sits with CST management. Day-to-day responsibility for implementing this policy and responding to data protection matters sits with the **Data Protection Lead**.

All staff, contractors and associates are responsible for complying with this policy and handling personal data appropriately.

Supporting procedures for data retention, subject access requests and data breach management are implemented operationally in line with this policy and are reviewed as part of CST's quality assurance arrangements.

12. Related Policies

This policy should be read in conjunction with:

- Safeguarding Policy
- Reasonable Adjustments & Learner Support Policy
- Teaching, Learning and Assessment Policy
- Qualification Quality Assurance Procedures

13. Review of Policy

This policy is reviewed annually, or sooner if required due to changes in legislation, awarding body requirements or CST operations.