

# Data Protection Policy

Effective from 01/04/2025 Review due 31/03/2026

## 1. Introduction & Scope

Salt Training Limited recognises the importance of protecting personal data and ensuring compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. This policy sets out our commitments and procedures for handling data responsibly.

This policy applies to:

- Employees, contractors, apprentices, and trainees.
- Third-party service providers processing data on behalf of Salt Training Limited.
- Anyone whose data is collected, stored, or processed by the company.

## 2. Definitions

- **Personal Data:** Any information identifying an individual, such as name, address, phone number, financial details, or identification numbers.
- **Special Category Data:** Highly sensitive personal data, including health records, biometric data, political opinions, or sexual orientation.
- **Data Controller:** Salt Training Limited, responsible for data processing purposes and management.
- **Data Processor:** Any entity processing data on behalf of Salt Training Limited.
- **Data Subject:** The individual whose data is collected and processed.
- **Processing:** Any handling of personal data, including collection, storage, modification, sharing, or deletion.
- **Data Breach:** Any accidental or unlawful compromise of personal data security, including unauthorised access, loss, or destruction.
- **Pseudonymisation:** A process where data is altered so it cannot be linked back to an individual without additional information (e.g., encryption).

## 3. Data Protection Principles

1. Salt Training Limited is committed to the following **six key principles** of data protection:
2. **Lawfulness, fairness & transparency:** Personal data is collected lawfully and openly.
3. **Purpose limitation:** Data is used only for specific, legitimate purposes.

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4. **Data minimisation:** Only the necessary data is collected.
5. **Accuracy:** Personal data is kept accurate and updated.
6. **Storage limitation:** Data is retained only as long as necessary.
7. **Security:** Appropriate safeguards protect personal data.

## 4. Lawful Basis for Processing Personal Data

Salt Training Limited processes personal data under the following legal grounds:

- **Consent:** Individuals provide clear and informed permission.
- **Contractual necessity:** Data is required to fulfil a contract or employment agreement.
- **Legal obligation:** Data is required by law (e.g., tax records, employment regulations).
- **Vital interests:** Processing is necessary to protect someone's life.
- **Public interest:** Data processing serves a broader benefit, such as regulatory compliance.
- **Legitimate interests:** Data is processed for valid business needs, balancing individual rights.

## 5. Roles & Responsibilities

Salt Training Limited ensures all personnel uphold data protection standards:

- **Directors & Leadership Team:** Provide oversight and allocate resources for compliance.
- **Data Protection Officer (DPO):** Monitors data security, provides guidance, and oversees compliance.
- **Employees & Apprentices:** Handle personal data responsibly and follow security protocols.
- **Third-party vendors:** Must comply with this policy when processing data on behalf of the company.

## 6. Rights of Data Subjects

Individuals have the right to:

- **Access** their personal data.
- **Request correction** of inaccurate records.
- **Request deletion** of data under certain conditions.
- **Restrict processing** of their data.
- **Object** to certain uses of their data.
- **Request data portability** to another organisation.

Salt Training Limited will address such requests within **one month**.

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## 7. Data Security Measures

To protect personal data, Salt Training Limited implements:

- Secure access control measures.
- Encrypted digital records.
- Staff training on data handling and cybersecurity.
- Multi-Factor Authentication.
- Regular audits and compliance checks.
- Secure disposal procedures for old records.

## 8. Handling & Processing of Personal Data

Salt Training Limited collects and processes personal data to support operations in:

- **Training & education services:** Managing trainees and apprentices.
- **Employment & HR:** Payroll, benefits, staff evaluations.
- **Health & Safety:** Workplace security and medical reporting.
- **Financial transactions:** Payments, billing, and accounting.
- **Legal & compliance:** Regulatory requirements and audits.

Data may be shared **internally and externally** for necessary business functions but **never** without legal justification.

## 9. Data Breach Management

Salt Training Limited follows strict procedures for identifying and managing **data breaches**:

1. **Detection & Reporting:** Any suspected data breach must be reported to the DPO immediately.
2. **Assessment:** The DPO evaluates the impact of the breach.
3. **Notification:** If required, serious breaches are reported to the **Information Commissioner's Office (ICO) within 72 hours**.
4. **Remediation:** Steps are taken to mitigate risks and prevent future occurrences.

### 9.1 Data Retention & Disposal

Personal data is retained only as long as necessary and securely disposed of according to the organisation's retention schedule.

Records will be securely stored and shared when necessary for:

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- External quality assurance by awarding bodies.
- Learner appeals and malpractice investigations.
- Regulatory compliance and information requests from awarding or regulatory bodies.

## 9.2 Data Retention Periods and Requirements

### Long-Term Retention (Minimum 7 Years)

To substantiate certification claims, support malpractice investigations, and comply with regulatory requests, Salt Training Limited will retain the following records for **at least seven years** from the date of certification:

#### *Learner Information*

- Full name.
- Learner number or Unique Learner Number (ULN).
- Contact details (address and phone number).
- Qualification regulator reference and title.
- Date of qualification achievement.
- Grade (if applicable).

#### *Unit Achievement Records*

- Unit name and regulator reference number.
- Tutor/Trainer and Assessor responsible for the unit.
- Internal Quality Assurer (IQA) (if sampled).
- Date of unit achievement confirmation within the Centre.
- Grade of the unit (if applicable).

### Medium-Term Retention (Minimum 3 Years)

The following records will be retained for **at least three years** and made available upon request by awarding bodies:

#### *Assessment and Examination Records*

- Assessment plans and records of assessment decisions (including learning outcomes, assessment criteria, location, assessor details, and date of assessment).
- Records of all examinations conducted and their results.
- Synoptic Practical Assignments and associated learner-generated evidence.

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- Progress tracking and measurement (Guided Learning Hours (GLH) and Total Qualification Time (TQT)).
- Records of exemptions and Recognition of Prior Learning (RPL).
- Assessment methods used for each unit/component.
- Locations of supporting evidence storage.
- Assessment reviews and decisions.

#### ***Internal Quality Assurance (IQA) Records***

- Sample selection details and IQA strategy.
- Verified assessment decisions, IQA name, and verification date.
- Records of IQA standardisation meetings.
- Assessor support meetings and resolution records.
- Completed declarations of authenticity.

### **9.3 Data Security and Storage**

#### **Paper-Based Storage**

- All paper records are securely stored on Salt Training Limited's premises.
- Central archiving ensures a controlled system for access and record management.
- A tracking system monitors the removal of documents from storage.

#### **Electronic Storage**

- Assessment and IQA records are stored electronically to ensure data preservation.
- A **secure platform** is used for storage, with **controlled staff access permissions** to prevent unauthorized data deletion or modification.
- **Cloud backups** are in place to ensure redundancy and data recovery. Information is backed up daily to the secure cloud system.

### **9.4 Cybersecurity and Data Protection**

Salt Training Limited implements **robust security measures** to prevent unauthorized access, cyber-attacks, or data breaches:

- Appropriate antivirus software and cybersecurity protocols.
- Regular security audits conducted **four times a year** to verify data integrity.
- Controlled staff access to electronic records and cloud-based backups.
- Hold Cyber Security Insurance
- Cyber Essentials achieved with all programme requirements

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## 9.5 Compliance and Responsibilities

- **Managing Director:** Holds overall responsibility for data protection, security, and ensuring compliance with regulatory and awarding body requirements.
- **Centre Staff:** Responsible for maintaining accurate, up-to-date records and adhering to security protocols.

## 10. Contact Information

For queries regarding this policy or requests concerning personal data, contact: **Salt Training Limited – Data Protection Officer**

Managing Director Kurt Salter

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