



DATA PROTECTION POLICY

Policy Owner: Head Office

Governance Oversight: Grand Council

Applies to: Staff, examiners, Teacher Members, centres, contractors, learners and applicants

Review Cycle: Annual or following legislative or regulatory change

Last updated: 9th February 2026

1. Purpose

International Performing Arts & Theatre Limited (“I-PATH”) is committed to protecting the rights, privacy and personal data of all individuals whose information it processes.

This policy sets out how I-PATH:

- complies with UK data protection law
- processes personal data lawfully, fairly and transparently
- protects assessment integrity and learner trust
- ensures appropriate governance and accountability
- meets Ofqual expectations relating to organisational capability, record-keeping and public confidence

2. Legal Framework

This policy complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- relevant UK Government and Information Commissioner’s Office (ICO) guidance

It supports Ofqual’s regulatory expectations relating to fairness, integrity, governance and learner protection through the awarding organisation.

3. Definitions

For the purposes of this policy:

- **Personal Data:** any information relating to an identified or identifiable living individual
- **Special Category Data:** personal data revealing health, disability or other protected information
- **Processing:** any operation performed on personal data (collection, storage, use, disclosure, deletion)
- **Data Subject:** the individual to whom the data relates
- **Data Controller:** the organisation determining how and why personal data is processed



I-PATH is the Data Controller for the personal data it processes.

4. Scope

This policy applies to all personal data processed by I-PATH, including data relating to:

- learners and candidates
- parents and carers
- Teacher Members and centres
- examiners, staff and contractors
- applicants and website users

It applies to data held in electronic, written, photographic, video or audio formats.

5. Data Protection Principles

I-PATH processes personal data in accordance with the UK GDPR principles. Personal data must be:

1. processed lawfully, fairly and transparently
2. collected for specified, explicit and legitimate purposes
3. adequate, relevant and limited to what is necessary
4. accurate and kept up to date
5. retained only for as long as necessary
6. processed in a way that ensures appropriate security

6. Lawful Bases for Processing

I-PATH processes personal data under one or more of the following lawful bases:

- performance of a contract
- compliance with a legal obligation
- legitimate interests (where not overridden by individual rights)
- consent (where required, particularly for special category data)

Processing decisions are documented and reviewed.

7. Special Category Data

I-PATH may process special category data where necessary, including:

- health or disability information for Reasonable Adjustments and Special Consideration
- safeguarding and first aid information

Such data is processed only where:

- explicit consent has been obtained, or



- processing is necessary to meet legal or safeguarding obligations

Access is strictly limited.

8. Children and Young People

I-PATH works with children and young people as part of qualification delivery.

- data is collected only where necessary
- parental or carer consent is obtained where required
- enhanced safeguards are applied
- data is not used for marketing purposes

9. Responsibilities

9.1 I-PATH Responsibilities

I-PATH will:

- ensure compliance with data protection law
- implement appropriate technical and organisational measures
- provide staff and examiners with guidance and training
- respond appropriately to data protection incidents
- review data protection arrangements regularly

9.2 Staff, Examiners and Contractors

All individuals with access to personal data must:

- process data only as authorised
- maintain confidentiality
- comply with this policy and related procedures
- report suspected data breaches immediately

Failure to comply may result in disciplinary action or sanctions.

10. Data Collection and Transparency

When collecting personal data, I-PATH ensures that individuals are informed about:

- why their data is being collected
- how it will be used
- who it may be shared with
- how long it will be retained
- their rights under data protection law



This information is provided via privacy notices and published policies.

11. Data Storage and Security

I-PATH ensures that:

- personal data is stored securely
- access is restricted to authorised individuals
- appropriate security measures are in place
- systems are protected in line with the Cyber Security Policy

Data is protected against unauthorised access, loss, misuse or disclosure.

12. Data Sharing

Personal data may be shared where necessary with:

- staff and examiners acting on behalf of I-PATH
- the awarding organisation (for regulated qualifications)
- service providers under contractual controls
- regulators or public authorities where legally required

Data is shared only on a need-to-know basis.

13. International Data Transfers

Where personal data is transferred outside the UK:

- appropriate safeguards are applied
- transfers comply with UK GDPR requirements
- data protection rights are preserved

14. Data Retention and Disposal

Personal data is retained only for as long as necessary, including:

- assessment and certification records retained in line with regulatory requirements
- financial records retained in accordance with statutory obligations
- safeguarding records retained in line with safeguarding guidance

Data is disposed of securely when no longer required.

15. Individual Rights

Individuals have the right to:



- access their personal data
- request correction of inaccurate data
- request erasure (where applicable)
- restrict or object to processing
- withdraw consent (where processing is based on consent)

Requests must be made in writing and will be handled within statutory timescales.

16. Data Breaches

Any actual or suspected data breach must be reported immediately to Head Office.

I-PATH will:

- investigate breaches promptly
- take appropriate remedial action
- notify the ICO and affected individuals where required

17. Monitoring and Review

I-PATH monitors compliance through:

- internal review
- quality assurance activity
- awarding organisation audit
- governance oversight

This policy is reviewed annually and updated as required.

18. Contact

All data protection queries or requests should be directed to: info@i-path.org