



TRAINING FOR  
ELECTRICIANS LTD



# DATA PROTECTION POLICY

Guidelines for managing and  
protecting data responsibly

# 2025



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## 1. Statement of Intent

*Training for Electricians Ltd* collects and uses personal information about learners, staff, contractors, and visitors in order to deliver training services and fulfill its legal and contractual obligations. This information is required not only to manage day-to-day operations but also to comply with statutory and regulatory requirements, including those set by awarding organizations, funding bodies, and safeguarding authorities.

*Training for Electricians Ltd* is registered as a Data Controller with the Information Commissioner's Office (ICO). The registration outlines the categories of data we hold, the purposes for which it is processed, and the lawful basis for doing so. Details of our registration can be viewed on the ICO's website.

In line with our obligations, *Training for Electricians Ltd* issues a Privacy Notice to all learners, staff, contractors, and visitors. This document explains what personal data we collect, why we collect it, how it is used, and with whom it may be shared.

The aim of this policy is to ensure that all personal data processed by *Training for Electricians Ltd* is:

- Collected, stored, and managed in full compliance with UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- Used fairly, lawfully, and transparently.
- Adequate, relevant, and limited only to what is necessary for the purposes for which it is processed.
- Kept accurate, up to date, and retained only for as long as is necessary.
- Stored securely, with appropriate safeguards in place to protect against unauthorized access, loss, or misuse.

This policy applies to all staff, learners, contractors, and visitors whose data is held by *Training for Electricians Ltd*.

### Legislation and Guidance

This policy is designed to ensure that *Training for Electricians Ltd* complies fully with current UK data protection legislation and best practice guidance. In particular, it meets the requirements of:

- UK General Data Protection Regulation (UK GDPR) – which incorporated the EU GDPR into UK law, with amendments made by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2020.
- Data Protection Act 2018 (DPA 2018) – which supplements the UK GDPR and sets out additional provisions, including those relating to law enforcement and safeguarding.

This policy is based on guidance issued by the Information Commissioner's Office (ICO) and reflects:

- The ICO's guidance on the processing of personal data.
- The Protection of Freedoms Act 2012, in relation to biometric data.
- The ICO's guidance on the use of surveillance systems and CCTV.

By following this legislation and guidance, *Training for Electricians Ltd* ensures compliance not only with statutory duties but also with contractual and regulatory obligations linked to awarding bodies and funding agencies.

## What is Personal Data?

Under the UK GDPR, personal data is defined as any information relating to an identified or identifiable natural person (known as a “data subject”). An identifiable person is one who can be recognised, directly or indirectly, by reference to an identifier such as:

- A name or contact details
- An identification number
- Location data
- An online identifier (e.g., IP address, username)
- One or more factors specific to the individual’s physical, physiological, genetic, mental, economic, cultural or social identity

Personal data also includes:

- Opinions or expressions about an individual.
- Intentions or decisions made in relation to an individual.
- Data captured in photographs, video recordings (including CCTV), or audio recordings where the individual can be identified.

This definition covers both digital and paper-based records. Any information that makes an individual identifiable, whether alone or when combined with other available data is considered personal data.

## Roles and Responsibilities

This policy applies to all staff employed by *Training for Electricians Ltd*, as well as to external organisations, contractors, or individuals working on our behalf. Staff who fail to comply with this policy may be subject to disciplinary action.

### Managing Director

The Managing Director has ultimate responsibility for ensuring that Training for Electricians Ltd complies with all relevant data protection obligations. They will ensure that sufficient resources are in place to support compliance and that data protection is embedded within the organisation’s culture and practices.

### Centre Managers

Centre Managers are responsible for:

- Acting as the representative of the data controller on a day-to-day basis within their centre.
- Ensuring that staff, learners, and visitors follow this policy and associated procedures.
- Reporting any data protection concerns, breaches, or risks to the DPO immediately.
- Supporting the completion of Data Protection Impact Assessments (DPIAs) where new projects, systems, or processes involve the use of personal data.

### All Staff

Every member of staff has an important role to play in ensuring compliance with data protection law. Staff must:

- Collect, store, and process any personal data only in line with this policy.
- Keep personal information accurate and up to date, including notifying the centre of changes to their own personal details (e.g., address or contact number).
- Contact the DPO (via their line manager or directly) if:
  - They have any questions about this policy or data protection law.
  - They are unsure whether they have a lawful basis to use personal data in a particular way.
  - They are drafting or issuing privacy notices.
- An individual has invoked their data protection rights (e.g., subject access, right to erasure, right to restrict processing).

- They intend to transfer personal data outside of the UK.
- They are planning a new project, system, or activity that involves processing personal data and may require a DPIA.
- They suspect, witness, or become aware of a data breach.
- Always handle personal data securely and in accordance with training provided.

## Learners

Learners at *Training for Electricians Ltd* also have a responsibility to respect and protect personal data. This includes:

- Following the Data Protection Policy and any instructions given by staff regarding confidentiality.
- Not sharing personal information about other learners, staff, or placement colleagues without permission.
- Respecting the privacy of others during group work, assignments, or work placements.
- Keeping any data accessed as part of their studies (e.g., in projects or case studies) secure and confidential.
- Immediately reporting to a member of staff if they believe data has been shared, accessed, or lost inappropriately.

## Data Protection Principles

*Training for Electricians Ltd* is committed to processing all personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We follow the seven key principles of data protection, which require that personal data shall be:

### 1. Lawfulness, Fairness and Transparency

- Personal data must be processed lawfully, fairly, and in a transparent manner.
- Learners, staff, and stakeholders will be informed of how their data is used through clear and accessible privacy notices.

### 2. Purpose Limitation

- Personal data will only be collected for specified, explicit, and legitimate purposes.
- It will not be used for any other purpose without further consent or a lawful basis.

### 3. Data Minimisation

- Only the minimum amount of data necessary for the intended purpose will be collected and processed.
- Staff are required to avoid unnecessary or excessive collection of personal data.

### 4. Accuracy

- Personal data must be accurate and, where necessary, kept up to date.
- Individuals have the right to request that inaccurate or incomplete data be rectified without delay.

### 5. Storage Limitation

- Personal data will not be kept for longer than necessary.
- *Training for Electricians Ltd* maintains a Data Retention Schedule that sets out retention periods for different categories of data in line with legal and regulatory requirements.

### 6. Integrity and Confidentiality (Security)

- Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- This includes both organisational measures (e.g., staff training, clear policies) and technical measures (e.g., encryption, secure passwords, restricted access).

## 7. Accountability

- *Training for Electricians Ltd* is responsible for demonstrating compliance with these principles.
- This is achieved through effective governance, policies, training, monitoring, and clear records of processing activities.

### Policy Statement

*Training for Electricians Ltd* is fully committed to maintaining the principles of data protection and ensuring that personal information is handled lawfully, fairly, and transparently at all times.

Therefore, we will:

- Clearly inform individuals why their information is being collected at the point of collection, through privacy notices.
- Inform individuals when their information is shared, explaining why it has been shared and with whom, where appropriate.
- Regularly check the quality and accuracy of the personal data we hold.
- Ensure information is not retained for longer than necessary, in line with our Records Retention Schedule and legal requirements.
- Ensure that when information becomes obsolete, it is destroyed appropriately and securely (e.g., via shredding or certified data deletion).
- Maintain clear and robust safeguards to protect all personal data from loss, theft, misuse, or unauthorised disclosure, regardless of the format in which it is recorded.
- Share personal information with third parties only when it is lawful and appropriate to do so.
- Have clear procedures in place to ensure compliance with Subject Access Requests (SARs) and other data subject rights.
- Ensure all staff are aware of and understand this policy and supporting procedures through training and regular updates.

### Lawful Processing

*Training for Electricians Ltd* collects and uses personal information about learners, staff, parents/carers (where applicable), and others in accordance with the lawful bases set out under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Where we process special category data (such as medical information or safeguarding records), this is done under Article 9 of the UK GDPR.

In addition, certain data collection is required by law, including under the Education Act 1996 and related statutory guidance on education and training providers.

The lawful bases for processing personal data under Article 6 of the UK GDPR are:

- Consent – where the individual has given clear consent for us to process their personal data for a specific purpose.
- Contract – where processing is necessary to fulfil a contract we have with the individual, or to take specific steps before entering into a contract.
- Legal Obligation – where processing is necessary for us to comply with the law (for example, safeguarding and employment law).
- Vital Interests – where processing is necessary to protect someone's life.
- Legitimate Interests – where processing is necessary for our legitimate business interests or those of a third party, except where such interests are overridden by the rights and freedoms of the individual.

*Training for Electricians Ltd* will always identify the lawful basis before collecting or using any personal data, ensuring that data is only processed where there is a clear and justifiable reason.



## Privacy Notices and the Right to be Informed

A privacy notice is a statement that explains how *Training for Electricians Ltd* collects, uses, stores, and shares personal information. Some organisations may call this a privacy statement, fair processing notice, or privacy policy.

In line with the UK GDPR and Data Protection Act 2018, we are required to inform individuals clearly and transparently about:

- What personal information we collect, hold, and share
- Why we collect and use this information
- The lawful basis on which we process this information
- Who we share this information with and why
- Our data collection requirements, including any statutory returns
- How individuals can access their personal data and exercise their rights

Copies of our privacy notices are available on the Training for Electricians Ltd website or can be requested directly from our office. These notices are updated regularly to ensure compliance and transparency.

## Consent

Where the use of personal data requires consent, this must be a clear and positive action by the individual. Consent cannot be implied from silence, inactivity, or pre-ticked boxes.

Consent will be sought, where applicable, from:

- Learners (considering their age, maturity, and understanding)
- Parents/carers (where the learner is under 16, unless the learner is deemed competent to provide their own consent)
- Staff members

Records will be kept of what consent was given, by whom, and when.

Consent previously given under the Data Protection Act 1998, if compliant with UK GDPR standards, will continue to be valid.

Individuals have the right to withdraw consent at any time. If you wish to withdraw your consent, please contact our Data Protection Lead (DPL) at:

**Enquiries@tfeukltd.com**

We will then ensure your request is actioned promptly and that your data is no longer processed under that consent.

## Right of Access

Under the UK GDPR, individuals have the right to know whether their personal data is being processed and to access that data to verify that the processing is lawful. This is commonly known as making a Subject Access Request (SAR).

*Training for Electricians Ltd* is committed to responding to all subject access requests in line with data protection legislation. Further details of how to make a request, including timescales and responsibilities, are set out in our Subject Access Request Procedure.

## The Right to Rectification

Individuals have the right to request that any inaccurate or incomplete personal data held by *Training for Electricians Ltd* be corrected or completed without undue delay.

When such a request is received, we will:

- Ensure that the requested rectification is actioned within one month (this may be extended by up to two months if the request is complex).

- Where the personal data has been disclosed to third parties, make reasonable efforts to notify them of the rectification.
- Inform the individual of which third parties (if any) their data has been shared with, where appropriate.

If *Training for Electricians Ltd* decides not to act upon a rectification request, we will provide the individual with a clear explanation of the reasons for this decision, and inform them of their right to raise a complaint with our Data Protection Lead (DPL)

## **The Right to Erasure (Right to be Forgotten)**

Individuals have the right to request the deletion or removal of their personal data where there is no compelling reason for its continued processing.

Requests for erasure will be considered in the following circumstances:

- Where the personal data is no longer necessary for the purpose for which it was originally collected or processed.
- When consent has been withdrawn and there is no other lawful basis for processing.
- When the individual objects to processing and there are no overriding legitimate grounds to continue.
- Where the personal data has been unlawfully processed.
- Where erasure is required to comply with a legal obligation.
- Where the personal data has been collected in relation to the provision of online services to a child.

*Training for Electricians Ltd* may refuse a request for erasure where the data is processed for the following purposes:

- To exercise the right of freedom of expression and information.
- To comply with a legal obligation or to perform a task in the public interest.
- For reasons of public health in the public interest.
- For archiving purposes, scientific or historical research, or statistical purposes.
- For the establishment, exercise, or defence of legal claims.

Where erasure is agreed, *Training for Electricians Ltd* will notify third parties to whom the data has been disclosed, unless it is impossible or requires disproportionate effort. Where data has been made public online, reasonable steps will be taken to ensure that other organisations are informed so they can remove links or copies of the personal data.

## **The Right to Restrict Processing**

Individuals also have the right to request that the processing of their personal data is restricted. In such cases, the data will be stored but not actively processed, except to ensure the restriction is respected.

Processing will be restricted in the following situations:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the data is verified.
- Where an individual objects to processing and consideration is being given to whether the organisation's legitimate grounds override those of the individual.
- Where processing is unlawful, but the individual requests restriction instead of erasure.
- Where *Training for Electricians Ltd* no longer requires the personal data, but the individual needs it to establish, exercise, or defend a legal claim.

If the restricted data has been disclosed to third parties, they will be informed of the restriction unless this is impossible or would involve disproportionate effort.

We will inform individuals when a restriction on processing has been lifted.

## The Right to Data Portability

Individuals have the right to obtain and reuse their personal data for their own purposes across different services. This allows personal data to be moved, copied, or transferred safely and securely between IT systems without hindrance to usability.

This right only applies in the following circumstances:

- To personal data that the individual has directly provided to *Training for Electricians Ltd*.
- Where the processing is based on consent or the performance of a contract.
- Where processing is carried out by automated means.

Where applicable, personal data will be provided in a structured, commonly used, and machine-readable format. This information will be provided free of charge.

Where feasible, and at the request of the individual, *Training for Electricians Ltd* will transfer the data directly to another organisation. However, we are not required to adopt or maintain systems that are technically compatible with all other organisations.

If the requested data relates to more than one individual, we will consider carefully whether compliance with the request would prejudice the rights of any other individual.

We will respond to requests for data portability within one month. Where a request is complex, or multiple requests are received, this may be extended by up to two months. In such cases, the individual will be informed within one month of receiving the request, along with the reason for the delay.

If no action is taken in response to a portability request, we will explain the reasons why and inform the individual of their right to complain to the Data Protection Lead (DPL) or the Information Commissioner's Office (ICO).

## The Right to Object

Individuals have the right to object to the processing of their personal data. This right is explained within our privacy notices and applies in the following situations:

- Processing based on legitimate interests or the performance of a task in the public interest.
- Direct marketing.
- Processing for research purposes (scientific, historical, or statistical).

Where processing is based on legitimate interests or the performance of a legal/public interest task:

- An individual's objection must relate to their particular situation.
- *Training for Electricians Ltd* will stop processing the personal data unless we can demonstrate compelling legitimate grounds for the processing which override the individual's interests, rights, and freedoms, or where processing is necessary for the establishment, exercise, or defence of legal claims.

Where the objection concerns direct marketing, processing will cease immediately. *Training for Electricians Ltd* will not refuse an individual's objection to their data being used for direct marketing.

Where personal data is processed for research purposes, an individual must demonstrate grounds relating to their situation to object. In cases where processing is necessary for public interest research, *Training for Electricians Ltd* may not be required to comply with the objection.

## Privacy by Design and Data Protection Impact Assessments (DPIAs)

*Training for Electricians Ltd* is committed to adopting a privacy by design approach, ensuring that data protection principles are considered at the earliest stage of any project or processing activity. We will implement both technical and organisational measures to demonstrate that data protection has been embedded into our practices.



**Data Protection Impact Assessments (DPIAs)** will be carried out when introducing new technologies or where data processing is likely to result in a high risk to the rights and freedoms of individuals. DPIAs help us identify, assess, and address risks early, reducing potential costs and protecting the reputation of *Training for Electricians Ltd*.

DPIAs will be used in single projects or across multiple projects where appropriate.

Examples of high-risk processing where a DPIA may be required include:

- Systematic and extensive processing activities, such as profiling.
- Large-scale processing of special category data (e.g., health or safeguarding records) or data relating to criminal convictions/offences.

Each DPIA will include:

- A clear description of the processing operations and their purpose.
- An assessment of the necessity and proportionality of the processing in relation to the stated purpose.
- An outline of the risks to individuals' rights and freedoms.
- The measures put in place to manage, minimise, or remove those risks.

Where a DPIA indicates a high risk that cannot be mitigated, Training for Electricians Ltd will consult the Information Commissioner's Office (ICO) for advice before proceeding.

## **Data Breaches**

A personal data breach is any breach of security that leads to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

All staff at *Training for Electricians Ltd* will receive training to understand what constitutes a data breach and how to report one immediately.

Where a breach is likely to result in a risk to the rights and freedoms of individuals, the ICO will be notified within 72 hours of the breach being identified.

Where a breach is likely to result in a high risk to individuals, those affected will be informed directly and without undue delay.

*Training for Electricians Ltd* has robust breach detection, investigation, and reporting procedures in place to ensure timely action.

Each breach notification will include:

- The nature of the personal data breach, including the categories and approximate number of individuals and records affected.
- The name and contact details of the Data Protection Lead (DPL), who will liaise with the organisation's Data Protection Officer (DPO).
- An explanation of the likely consequences of the breach.
- A description of the actions taken, or proposed to be taken, to deal with the breach.
- Where appropriate, details of measures implemented to mitigate possible adverse effects.

## **Data and Cyber Security**

*Training for Electricians Ltd* is committed to protecting all personal data against unauthorised or unlawful access, alteration, processing, or disclosure, as well as accidental loss, destruction, or damage. We have procedures and systems in place to minimise cyber security risks and to ensure compliance with UK GDPR and data protection best practice.

We follow the **Department for Education's Cyber Security Standards for Schools and Colleges** where applicable and maintain ongoing vigilance against cyber threats.

### **We will ensure that:**

- Network security is robust, monitored, and regularly updated.
- Software updates and patches are applied promptly to minimise vulnerabilities.
- Antivirus and anti-malware protection is installed and kept up to date.
- Access to systems is strictly controlled, based on the needs and responsibilities of each user.
- Secure configuration is adopted when installing or upgrading computers and network devices to reduce cyber threats.
- Cyber Security training is provided to all staff, apprentices on placement, agency staff, and contractors with access to our systems.
- Incident response plans are in place and regularly tested to ensure we can respond effectively to a cyber event.

### **For data security and storage:**

- Confidential paper records are kept in locked filing cabinets or safes with restricted access. They must never be left unattended in areas of general access.
- Digital data is encrypted, password-protected, and backed up securely to an off-site location.
- Removable devices (e.g. USB sticks) are only used if fully encrypted and password-protected.
- All electronic devices are password-protected. Lost or stolen devices must be reported immediately.
- Personal devices (phones, laptops, tablets) must not be used to store company or learner data.
- Each member of staff has their own secure login and password. Passwords must:
  - Be at least 8 characters long.
  - Include letters, numbers, and symbols.
  - Be changed at regular intervals.
- Emails containing sensitive information must be encrypted or password-protected if transmitted through insecure servers.
- Circular emails to learners or parents are always sent via bcc to protect addresses from disclosure.

### **For data taken off-site:**

- Staff must follow the same standards of security as on-site.
- Devices containing sensitive information must be kept securely locked when not in use.
- The member of staff removing the data accepts full responsibility for its safety.

### **Before sharing any data, staff must ensure that:**

- Sharing is permitted and lawful.
- Adequate safeguards are in place.
- The recipient is identified in the relevant privacy notice.
- If in doubt, advice is sought before sharing.

**Visitors** are never permitted access to confidential information. If visitors enter areas where sensitive data is stored, they must be supervised at all times.

The physical security of buildings, storage systems, and IT infrastructure is reviewed regularly. Where risks (such as theft or vandalism) are identified, additional security measures will be implemented.

Training for Electricians Ltd takes its obligations under the UK GDPR and data protection law seriously. Any unauthorised disclosure of data may result in disciplinary action.

The **Data Protection Officer (DPO)** is responsible for ensuring continuity and recovery measures are in place to protect critical data in the event of system failure, attack, or other incident.

## Publication of Information

*Training for Electricians Ltd* maintains a Publication Scheme on our website to ensure transparency and accountability. This scheme outlines the categories of information that will be routinely available to the public, which include:

- Organisational policies and procedures.
- Annual reports and compliance statements.
- Financial and governance information.

Information covered by the publication scheme will be made available promptly and easily upon request.

We will not publish any personal information (including photographs) without the informed consent of the individual concerned. When publishing documents online, staff must ensure that metadata or previously deleted information cannot be accessed by external users.

## CCTV and Photography

We recognise that capturing images of identifiable individuals through CCTV or photography constitutes the processing of personal data and must therefore comply with UK GDPR and data protection principles.

- CCTV cameras are only installed in locations where there is a clear and legitimate purpose, such as safety, security, and crime prevention.
- Placement of cameras is carefully considered to avoid unnecessary intrusion into personal privacy.
- Staff, learners, and visitors are made aware of CCTV use through clear signage at entry points and within the premises.

All CCTV footage is retained securely for up to **60 days**, after which it will be automatically overwritten unless required for an ongoing investigation. The **Data Protection Lead (DPL)** is responsible for managing CCTV records and ensuring access is restricted to authorised personnel only.

For photography and filming at company events, open days, or within the training centre:

- We will always inform individuals of our intention to capture images.
- Consent will be obtained before publishing any photographs or videos in promotional materials, on social media, or on the company website.
- Images will be used responsibly and only for the purposes outlined at the time of consent.

## Photography and Video Recording

As part of *Training for Electricians Ltd's* activities, we may take photographs or record videos of individuals during training and related events.

Consent:

- *Training for Electricians Ltd* will obtain written consent from parents, carers, guardians, or students for general use of photographs and videos.
- Written consent will also be obtained specifically for any photographs or videos intended for communication, marketing, or promotional purposes. We will clearly explain to both the parent/carer/guardian and the student how these images or videos will be used.
- Where parental consent is not required, we will ensure the student understands how their image or video will be used.

Uses of Photographs and Videos:

Images and recordings may be used for:

- Display's within Training for Electricians Ltd premises, including notice boards, magazines, brochures, prospectuses, and newsletters.
- Inclusion in learners' records or books to evidence their progress.
- Distribution by external agencies, such as photographers, newspapers, or campaigns.
- Online use on Training for Electricians Ltd's website or social media pages.

## Privacy and Safeguarding:

When publishing images or videos, *Training for Electricians Ltd* will not include any personal information that could identify the individual without explicit consent.

Consent can be refused or withdrawn at any time. If consent is withdrawn, *Training for Electricians Ltd* will delete the photograph or video and ensure it is not further distributed.

## Filtering and Monitoring

In line with best practice and safeguarding requirements, *Training for Electricians Ltd* uses IT filtering and monitoring systems.

- Filtering systems prevent access to internet sites that are inappropriate or illegal.
- Monitoring systems allow staff to appropriately oversee the use of devices on the network.

*Training for Electricians Ltd* ensures that all relevant staff are aware of these systems, understand their purpose, and manage them effectively in accordance with data protection legislation.

For further information on filtering and monitoring, please refer to the Training for Electricians Ltd E-Safety Policy available on our main website.

[www.trainingforelectricians.co.uk](http://www.trainingforelectricians.co.uk)

## Data Retention

*Training for Electricians Ltd* has a formal Record Retention Policy and Retention Schedule, broadly following guidance from the Information and Records Management Society (IRMS) and approved best practices.

- Data will only be kept for as long as necessary and will be deleted or destroyed as soon as practicable.
- Records are retained for at least the minimum period specified in the retention schedule.
- Both paper and electronic records are regularly monitored by staff to ensure compliance with retention periods.

Some educational or training records relating to former learners may be kept for longer periods for legal reasons or to provide references or training transcripts.

- Paper records will be shredded or pulped.
- Electronic records will be securely erased or destroyed once they are no longer required.

## Record Keeping

Under UK GDPR, *Training for Electricians Ltd* is required to maintain full and accurate records of all data processing activities.

We keep detailed records that include:

- Types of personal data held
- Types of data subjects
- Processing activities and purposes
- Third-party recipients of personal data
- Storage locations of personal data
- Any personal data transfers
- Retention periods for personal data
- Security measures in place to protect personal data

These records ensure transparency and accountability in line with legal requirements.

## Training

All staff and management at *Training for Electricians Ltd* receive Data Protection and E-Safety training as part of their induction process.

- Data protection training is also included in ongoing professional development to ensure staff remain up to date with changes in legislation, guidance, or organisational processes.
- Data Protection Leads are provided with additional training to enable them to effectively carry out their roles and responsibilities.

## Subject Access Requests (SARs)

Individuals have the right to request access to the personal information that *Training for Electricians Ltd* holds about them. This is known as a **Subject Access Request (SAR)**.

SARs can be submitted in any form, but we can respond more efficiently if the request is made in writing.

We provide a Subject Access Request Form, which we ask individuals to complete where possible. Requests can be made directly to the **Data Protection Lead (DPL)**.

Any staff member receiving a SAR must immediately forward it to the DPL.

### Verification of Identity:

The identity of the requestor will be confirmed before any information is disclosed.

For requests relating to a child's record, proof of relationship to the child will also be required.

The individual making the request will be contacted to confirm the request, and two forms of identification will be required.

### Children and SARs:

Children have the right to access information held about them, depending on their capacity to understand (typically age 12 or above) and the nature of the request.

The Principal or DPL will discuss the request with the student and consider their views when making a decision.

A student competent to understand their records can refuse to consent to access.

If a child is not deemed competent, a parent or guardian will make the decision on their behalf.

### Third-Party Representatives:

If an individual wishes to appoint a third-party representative to act on their behalf, they must complete the Authority of a Third-Party Representative SAR Form and provide identification for both themselves and the representative.

This form can be provided by the DPL upon request.



### Provision of Information and Fees

- A copy of the requested information will be supplied to the individual free of charge.
- A reasonable fee may be charged for requests for additional copies of the same information.
- Requests made electronically will be fulfilled in a commonly used electronic format.

### Response Times

- All SARs will be responded to without undue delay and, in any case, within one month of receipt.
- For complex or numerous requests, this period may be extended by a further two months. The individual will be informed of the extension and the reasons for it within one month of receipt of the request.

### Refusal of Requests

- Where a request is manifestly unfounded or excessive, *Training for Electricians Ltd* reserves the right to refuse to respond.
- The individual will be informed of the refusal, the reasoning, and their right to complain to the Information Commissioner.

### Exemptions

- Under UK GDPR and the **Data Protection Act 2018**, certain information may be exempt from disclosure. Examples include information that:
  - Might cause serious harm to the physical or mental health of the individual or another person
  - Would reveal that a child is at risk of abuse, where disclosure is not in the child's best interests
  - Is contained in adoption or parental order records
  - Includes information provided to a court in proceedings concerning the child

Requests from statutory bodies regarding safeguarding concerns may still be fulfilled, as the DPA and UK GDPR do not prevent the sharing of information to protect children or promote their welfare. Staff should consult the Designated Safeguarding Lead if in doubt.

### Delivery of Information

Information can be provided in person at the academy with a member of staff available to explain the contents if requested.

The applicant's preferred method of delivery should be considered.

If posted, information will be sent via registered or recorded mail to ensure secure delivery.

### Disposal of Records

*Training for Electricians Ltd* recognises that the secure disposal of redundant data is essential for legal compliance and risk management.

- All data, regardless of format (paper, electronic, tape, or other media), shall only be passed to a disposal partner with demonstrable competence in secure data destruction.
- Data will be destroyed or eradicated to agreed standards, meeting recognised national guidelines, with confirmation provided upon completion.
- Only qualified sources will be used for the disposal or collection of IT assets.

### Links to Other Policies

This policy should be read in conjunction with the following policies:

- Freedom of Information Policy and Publication Scheme
- CCTV Policy
- Information Security Policy

- E-Safety Policy
- Code of Conduct
- Child Protection and Safeguarding Policy
- Records Retention Policy

## Complaints

Complaints regarding the procedures outlined in this policy should be directed to the Data Protection Lead (DPL) at **Enquiries@tfeukltd.com**. The DPL will decide whether the complaint should be handled under Training for Electricians Ltd's Complaints Procedure.

- Complaints not suitable for the internal complaints process may be referred to the Information Commissioner's Office (ICO).
- Further guidance and information can also be found on the ICO website or via telephone: **01925 241 245**.

## Contacts

For queries or concerns regarding this policy, please contact the *Training for Electricians Ltd* office at **Enquiries@tfeukltd.com**.

Additional advice and information can be obtained from the Information Commissioner's Office (ICO).

