



GDPR Policy

Introduction

Lucelly Consultancy is committed to safeguarding the privacy and protection of personal data. This Data Protection Policy outlines our approach to handling personal data responsibly and in compliance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and other applicable data protection laws in the UK.

Data Controller and Data Protection Officer

The Data Controller for personal data processed by Lucelly Consultancy Ltd is Louise Dodds, Director.

Principles of GDPR

Lucelly Consultancy adheres to the following principles:

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

Why we process your information

We generally process your information when we need to do so to fulfil a contractual obligation (for example, to process your NVQ/qualification registration or where we or someone we work with needs to use your personal information for a reason related to their business (for example, to provide you with a training service via a third party or your details are sent to any of our freelance NVQ assessors or IQA).

Laws in the European Economic Area (“EEA”) and in the United Kingdom (“UK”) call these reasons “legitimate interests.”

These “legitimate interests” include:

- Preventing risk and fraud
- Answering questions or providing other types of support
- For use of Recognised Prior Learning (See RPL Policy for further details on what RPL is)
- Providing and improving our products and services
- Assisting with marketing, advertising, or other communications

We only process personal information for these “legitimate interests” after considering the potential risks to your privacy and balancing any risks with certain measures—for example, by providing clear transparency into our privacy practices, offering you control over your personal information where appropriate, limiting the information we keep, limiting what we do with your information, who we send your information to, how long we keep your information for.

Lucelly Consultancy Ltd may process personal data necessary for the provision of NVQ services. This may include, but is not limited to, names, contact details, company details, employment history, and assessment results.

We may also process your personal information where you have provided your consent. In particular, where we cannot rely on an alternative legal basis for processing, where you direct us to transfer information to a third party, where we receive your data from a third party is sourced and it already comes with consent or where we are required by law to ask for your consent (including in the context of some of our sales and marketing activities). At any time, you have a right to withdraw your consent by changing your communication choices, opting out from our communications or by contacting us.

Your Consent when using our website or services

By using our website “Get in Touch” facility, completing our registration form or contacting us via telephone, email or face to face, you are passing your consent for Lucelly Consultancy Ltd to store and use your information for the purposes of working with us.

We will only pass your information onto third parties associated with a NVQ/qualification or training registration (such as our Assessors and IQA’s, other NVQ Centre Partners, and/or Awarding Bodies) or referral to one of our training partners but only at your request. Your data will be held securely and treated confidentially and will not be disclosed to external parties other than as required for the purposes described above.

When you provide your information to us directly via one of the methods mentioned above, we only ask you to provide information that we need to provide the service you have requested. We will normally ask you to provide us with, as a minimum:

- Your full name
- Your contact details
- Your company details

When you register for a qualification or training via us, we require further information such as:

- Your full name
- Your home address
- Your contact details
- Your company details
- Your Date of Birth
- Your career history
- Details of disabilities or other medical conditions that are relevant to how we can support you undertaking a qualification or training with us
- Photo ID as this is used to register you with your legal name details and to check that you are the person undertaking the qualification to prevent malpractice and maladministration

What information we hold and why

If you do decide to work with us to complete an qualification or training, we will also ask for further information about you or your company as mentioned above as necessary as well as company information, photographs, emails or system screenshots etc in order to cover evidence required to meeting the criteria and learning outcomes outlined by the Awarding Body in their qualification standards.

Lucelly Consultancy Ltd, other NVQ Centres and Training Providers we work with will also need your Company's bank details to process and invoice for services provided.

Lucelly Consultancy, however, does not invoice you direct for any training services or any NVQ's we do not provide and these will come from our Partners.

However, we will facilitate this process on your behalf so that you have a seamless experience.

The information you provide to us will be used to process your NVQ registration and will only be done so with your consent.

We will never share or sell your data to any other company without your prior consent other than those processors we use for our business operations who process your data under their control, these are:

- Partner NVQ Assessors and IQA's.

- Partner NVQ Centre's, we work with.
- Third Party Training providers where you have expressed an interest to learn more about their services.
- IT support providers where it is deemed necessary for them to access our database to provide IT support, including the E-portfolio system we use to collate your NVQ evidence.
- Your company if they have booked or paid for your training.
- Legal representatives if necessary.
- Awarding Bodies for the purpose of processing your registration and paperwork for certification.
- Any other circumstances that have been expressly asked for by legal, courts or police personal. In these circumstances, we may be asked to provide share your information without your prior consent.

Once this information is transferred to them for processing with your consent, they will also need to look after your data in line with General Data Protection regulations (GDPR) 2018.

What information we hold that is not candidate related

Employee and freelance assessor/IQA information

We also hold data relating to our employees and Freelance Assessor and IQA's. T

The following types of data may be held by the Organisation, as appropriate, on relevant individuals:

- Name, address, phone numbers - for individual and next of kin
- CVs and other information gathered during recruitment
- References from former employers
- National Insurance numbers
- Bank details for payment purposes
- Job title, job descriptions and pay grades/salary information
- Conduct issues such as letters of concern, disciplinary proceedings
- Holiday records
- Internal performance information
- Medical or health information
- Sickness absence records
- Tax codes
- Terms and conditions of employment and/or freelance work

Centre Information

Also, as part of our Internal Quality Assurance (IQA) process which is monitored by the Awarding Bodies we work with, we also need to retain information that relates to how we manage IQA processes as part of our centre approval obligations.

- Records of IQA standardisation meetings
- Records of Assessor support meetings
- Assessor and IQA competence records and monitoring records of assessor/IQA progress towards achievement of the relevant assessor and/or IQA qualifications

Information provided to us by one of our NVQ Centre and Training Partners

As we work with other NVQ Centre's (providing them with assessment services for NVQ's they offer) and Training Partners, they may on occasion share your contact details with us if they believe you would benefit from our service and/or you have registered interest with them on our services.

If you do get contacted by us and are not happy to consent for us to hold your data, please contact us at info@lucellyconsultancy.org.uk and we will remove you from our database.

Data Security

Lucelly Consultancy Ltd will implement appropriate technical and organisational measures to ensure the security of personal data. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

How long we retain your data

All evidence submitted as part of your qualification, requires us to retain this information for a period as outlined by the Awarding Bodies we work with.

We are also required to retain information related to any requests for reasonable adjustments, special condition requests as well as all sampling reports as part of our internal quality assurance processes.

Awarding Bodies require all approved centres to maintain records, programme and candidate details, relating to each of their qualifications, **for a minimum period of 3 years** following the date of candidate certification and to make them available to the Awarding Body for the purposes of resolving any issues arising from external verification or appeals. Such records must be made available to the regulatory authorities upon request.

This information includes:

- Candidate name
- Date of birth
- Contact address
- Assessor's name(s)
- IQA's name

- Date of registration with the Awarding Body
- Candidate assessment records detailing:
 - Who assessed what and when
 - The assessment decision
 - The assessment methods used for each unit
 - The location of the supporting evidence (In our case Quals Direct- our e-portal)
 - Who verified what and when, details of the sample selected and its rationale
 - Records of certificates claimed including unit/credit certificates
 - Details of who claimed the certificate and when

Retention of Records in Relation to Reasonable Adjustments and Special Consideration

We are required to retain a log of all Reasonable Adjustments and Special Consideration applications must be stored ***for a period of at least 7 years*** from the candidate induction date. The application itself, alongside all supporting evidence, must be retained for a period of at least 3 years following the date of candidate certification.

Retention of Records in Relation to Malpractice and Maladministration Investigations

We are also required to keep the records of any malpractice and maladministration investigations for the duration of 7 years.

Data Breach Response

In the event of a data breach, Lucelly Consultancy Ltd will promptly assess the risk and, if required, report the breach to the Information Commissioner's Office (ICO) and affected data subjects in accordance with GDPR requirements.

Your rights over your data

We believe you should be able to access and control your personal information, and you have the right to request access to, correct, amend, delete, port to another service provider, restrict, or object to certain uses of your personal information. We will not charge you more or provide you with a different level of service if you exercise any of these rights.

Please note that a number of these rights apply only in certain circumstances, and all these rights may be limited by law.

If you are no longer happy to consent for us to hold your data, please contact us at info@lucellyconsultancy.org.uk and we will remove you from our database.

If you are still not satisfied in any way how we process this request, you can refer to the Information Commissioner's Office: <https://ico.org.uk/concerns/>

Training and Awareness

All Lucelly Consultancy direct employees will receive guidance on data protection principles and their responsibilities. Awareness programmes will be conducted regularly to ensure compliance.

Review and Amendment

This policy will be reviewed regularly to ensure its ongoing compliance with GDPR legislation and industry best practices. Changes will be made as necessary.

Document Owner:	Louise Dodds
Date of issue:	May 2026
Review Date:	May 2027