

GDPR Policy

Introduction

Competum Ltd is committed to protecting and respecting the privacy of all individuals who interact with our organisation. This Privacy Policy explains how we collect, use, store, and safeguard personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to all users of our website, learners, clients, partners, and any individuals whose data we process.

Purpose of this Policy

The purpose of this policy is to ensure that Competum Ltd:

- Processes personal data lawfully, fairly and transparently
- Protects the rights, freedoms and privacy of individuals
- Upholds high standards of data governance
- Ensures staff understand their responsibilities regarding personal data
- Complies with legal, contractual and regulatory obligations

This policy must be followed by all staff, contractors, trainers, assessors, administrators and anyone handling personal data on behalf of Competum Ltd.

Scope

This policy applies to:

- Website users
- Learners and course participants
- Clients and employers
- Contractors, associates, and partners

Competum Ltd may update or replace this policy from time to time. All staff will be notified of updates.

Key Roles and Responsibilities

Data Protection Officer (DPO)

Name: *Cris Drant*

Address:

BJB House,

Estate Road No.1,

Grimsby,

North East Lincolnshire,

DN31 2TB

Tel: 07507 065632

Email: cris@competum.co.uk

The DPO is responsible for:

- Overseeing data protection compliance
- Advising on legal obligations
- Responding to data subject access requests (DSARs)
- Investigating breaches
- Training and supporting staff

Data Processors (DPPs)

Staff acting as data processors are responsible for:

- Handling personal data securely
- Following this policy and related procedures
- Reporting risks or breaches immediately
- Ensuring data is accurate and up to date

Legal Basis for Processing Personal Data

Competum Ltd will only process data where at least one of the following lawful bases applies:

- Legitimate Interests: Processing that supports our operational, educational or business activities.
- Legal Obligation: Required by law, funding body rules or regulatory frameworks.
- Consent: Where freely given, specific, informed and unambiguous consent is appropriate.

Consent can be withdrawn at any time.

Types of Personal Data Processed

Competum Ltd processes personal data for the following purposes:

Staff Administration

- Employment records
- Payroll and tax information
- HR and training records
- Emergency contact details

Learner & Client Administration

- Enrolment data
- Assessment and progress records
- Support needs and reasonable adjustments
- Attendance and engagement data

Advertising, Marketing and Communication

- Information required for updates, events, newsletters (where consent or legitimate interest applies)

Accounts & Record Keeping

- Financial transactions
- Invoicing and funding evidence
- Contractual data

Competum Ltd will only collect the minimum data necessary for each purpose.

Data Protection Principles

Competum Ltd follows the **six core principles of the UK GDPR**, ensuring personal data is:

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. **Stored only as long as necessary**
6. **Processed securely**

Competum Ltd also complies with the accountability principle by keeping appropriate records and documentation.

Data Accuracy and Updates

- Data is reviewed regularly to ensure accuracy and relevance.
- Staff, learners and clients must promptly notify Competum Ltd of any changes.
- Incorrect or outdated data will be rectified or deleted without delay.

Data Security

All employees must follow security procedures to protect data, including:

Physical Security

- Personnel files stored in locked cabinets
- Files not left unattended
- Secure disposal via shredding or approved destruction methods

Digital Security

- Screens must be locked when unattended
- Strong passwords must be used and never shared
- Personal data must not be stored on unsecured devices
- Emails containing personal data must be sent securely
- Only authorised devices and systems may be used

Destroying or disposing of data counts as processing—it must be carried out safely and appropriately.

Data Retention and Disposal

Personal data will only be kept for as long as necessary for:

- Operational needs
- Legal obligations
- Funding or awarding-body requirements

After the retention period, data will be securely destroyed.

A detailed Data Retention Schedule is maintained separately.

Data Subject Rights

Individuals (data subjects) have the right to:

- Access their personal data (Subject Access Request – SAR)
- Request correction of inaccurate data
- Request deletion (where applicable)
- Object to certain processing
- Restrict processing in specific circumstances
- Request data portability (where appropriate)

All requests must be referred immediately to the DPO.

Competum Ltd will respond to SARs within 30 days unless legally permitted to extend.

References Provided by Third Parties

We may share personal information with:

- Awarding organisations
- Funding bodies and regulators
- External auditors and compliance bodies
- Approved contractors, consultants, associates, and partners

Where learner personal information is shared with external bodies, associates, consultants, contractors, awarding organisations, auditors, or other authorised third parties for the purposes of audit, quality assurance, compliance monitoring, funding verification, or related activities:

- Such information shall be used solely for the purpose for which it was provided
- External parties must only access, process, and utilise learner information while undertaking authorised activities on behalf of Competum Ltd
- Access to learner information must be restricted to normal working hours, unless otherwise formally authorised
- Learner contact details must not be used to contact learners outside of normal working hours
- Learner information must not be used for any purpose unrelated to the approved activity

All third parties:

- Must treat personal data as strictly confidential
- Must comply with UK GDPR, the Data Protection Act 2018, and Competum Ltd policies
- Are subject to contractual controls governing the use, storage, and protection of data

Any misuse of learner information may result in:

- Withdrawal of access
- Termination of contractual agreements
- Further legal or regulatory action where appropriate

Data Breaches

Any suspected or confirmed data breach must be reported immediately to the DPO.

The DPO will:

- Investigate the breach
- Mitigate risks
- Report to the ICO where required
- Implement improvements to prevent recurrence
- Notify affected individuals where appropriate

Failure to report a breach may result in disciplinary action.

Staff Responsibilities

All staff handling personal data must:

- Read and comply with this policy
- Attend data protection training when required
- Report issues promptly
- Follow secure handling, storage and disposal procedures
- Never disclose data unlawfully

Breaches of this policy may result in disciplinary action.

Policy Review

This Data Protection Policy will be reviewed:

- Annually
- When legislation changes
- After any serious data incident
- When organisational structures or data processes change
- **Approval and review**

Approved by	Keith McGroarty
Policy owner	Competum Ltd
Policy author	Cris Drant
Launch Date	01.05.20
Reviewed date	30.04.20, 30.04.21, 28.04.22, 25.04.23, 29.04.24,23.04.25,30.04.26
Updates and Adjustments	Reviewed and updated 01.05.26