

STAND & DELIVER

Learning & Development

Privacy Policy

Version 1.0 | June 2026

Data controller	Stand & Deliver Learning & Development (Stand & Deliver Limited)
ICO registration	ZB865829 (registered 12 February 2025)
Address	Unit 313, Daisyfield Business Centre, Appleby Road, Blackburn, BL1 3BL
Contact	Malin Patel info@standanddeliver.co.uk 07764 309441
Effective date	June 2026
Next review	June 2027
Governing law	England and Wales

This Privacy Policy explains how Stand & Deliver Learning & Development collects, uses, stores, shares and protects personal data relating to clients, delegates, website visitors and other individuals ('you'). It applies to all personal data we process in connection with our business activities, including the delivery of ILM accredited and non-accredited training programmes.

We are committed to handling personal data responsibly and in full compliance with the UK General Data Protection Regulation (UK GDPR) as retained in UK law by the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, and all other applicable data protection legislation.

Please read this Policy carefully. If you have any questions, contact us using the details above.

1. Who We Are

Stand & Deliver Learning & Development is the trading name of Stand & Deliver Limited, a company established in 1993 and based in Blackburn. We provide a wide range of training and development services, including leadership, management and coaching programmes, and we are an ILM (Institute of Leadership and Management) approved assessment centre delivering accredited qualifications at Levels 2 to 5.

For the purposes of UK data protection law, Stand & Deliver is the data controller in respect of personal data collected and processed in connection with our services. We are registered with the Information Commissioner's Office (ICO) under registration reference ZB865829.

2. Personal Data We Collect

2.1 Data You Provide to Us Directly

We collect personal data that you, or a client organisation acting on your behalf, provide to us when:

- making an enquiry about our programmes, by telephone, email or via our website;
- completing a booking or registration form for a training programme;
- enrolling on an ILM accredited qualification, including providing identity verification documents;
- corresponding with us by email, telephone or post;
- completing evaluation or feedback forms following a programme; or

- applying for a role with us or expressing interest in working as an associate trainer or assessor.

The personal data we collect in these circumstances may include:

- full name and preferred name;
- job title and employing organisation;
- postal address, email address and telephone number;
- identity verification documents (such as a passport or photocard driving licence), where required for ILM registration;
- educational background and professional experience relevant to programme suitability;
- assignment and assessment work submitted as part of an ILM qualification;
- attendance records and learning progress information; and
- bank or payment details, where you are making payment directly to us.

2.2 Data Provided by Client Organisations

Where a client organisation books a programme on behalf of delegates, it will typically provide us with the names, contact details and relevant background information of those delegates. If you are a delegate whose details have been provided to us in this way, this Policy applies equally to your data.

2.3 Data Collected Automatically

When you visit our website at www.standanddeliver.co.uk, we may collect certain technical information automatically, including your IP address, browser type, the pages you visit and the time and date of your visit. This information is used for website administration, security monitoring and to improve the user experience. Please see Section 11 for further information on cookies.

2.4 Special Category Data

We do not routinely collect or process special category personal data (such as health data, ethnic origin, disability, or criminal records). Where a delegate discloses a disability or learning difficulty in order to request an access arrangement or reasonable adjustment for assessment purposes, we will handle that information sensitively and only use it for the purpose for which it was disclosed, in accordance with our Access to Assessment Policy. Disclosure of such information is voluntary.

3. How and Why We Use Personal Data

We process personal data for specific, legitimate purposes. The table below sets out our main processing activities, the categories of personal data involved, and the lawful basis under UK GDPR that we rely upon.

Purpose	Personal Data	Lawful Basis
Administering bookings and managing course places	Name, contact details, employer details, booking information	Performance of a contract (Article 6(1)(b))
Verifying the identity of delegates for ILM registration	Name, identity documents (passport/driving licence)	Legal obligation (Article 6(1)(c)) and legitimate interests (Article 6(1)(f))
Registering delegates on ILM qualifications via the Walled Garden	Name, contact details, employer, qualification details	Performance of a contract (Article 6(1)(b)) and legal obligation (Article 6(1)(c))
Delivering training programmes and providing tutorial support	Name, contact details, attendance records, assignment work	Performance of a contract (Article 6(1)(b))
Assessing and providing feedback on assignment work	Name, assignment submissions, assessment outcomes	Performance of a contract (Article 6(1)(b))
Internal quality assurance (IQA) and sampling of assessed work	Name, assignment submissions, assessment records	Legal obligation (Article 6(1)(c)) and legitimate interests (Article 6(1)(f))

Purpose	Personal Data	Lawful Basis
Requesting ILM certification and dispatching certificates	Name, qualification outcomes, contact details	Performance of a contract (Article 6(1)(b))
Issuing invoices and managing payment	Name, employer details, payment information	Performance of a contract (Article 6(1)(b)) and legal obligation (Article 6(1)(c))
Communicating with delegates and client contacts about programme progress	Name, contact details, progress information	Performance of a contract (Article 6(1)(b)) and legitimate interests (Article 6(1)(f))
Handling complaints, appeals and malpractice investigations	Name, contact details, submission records, investigation notes	Legal obligation (Article 6(1)(c)) and legitimate interests (Article 6(1)(f))
Sending information about our programmes and services to existing clients	Name, contact details, programme history	Legitimate interests (Article 6(1)(f))
Compliance with legal and regulatory requirements	All relevant personal data held	Legal obligation (Article 6(1)(c))
Maintaining records for quality and accreditation purposes	Delegate and programme records	Legal obligation (Article 6(1)(c)) and legitimate interests (Article 6(1)(f))

3.1 Legitimate Interests

Where we rely on legitimate interests as our lawful basis, we have assessed that our interests are not overridden by your rights and interests. Our legitimate interests include: administering our business efficiently; maintaining and improving the quality of our programmes; communicating with clients and delegates about their ongoing or completed training; preventing malpractice and maintaining the integrity of ILM accredited qualifications; and ensuring the security of our systems and premises.

You have the right to object to processing based on legitimate interests. Please see Section 9 for further details.

4. Who We Share Personal Data With

We do not sell personal data to any third party. We share personal data only where necessary for the purposes described in this Policy, and only with organisations that provide adequate data protection safeguards. The main recipients are set out below.

4.1 ILM (Institute of Leadership and Management)

As an ILM approved centre, we are required to share delegate personal data with ILM for the purposes of learner registration, certification and quality assurance. ILM is a business of The City and Guilds of London Institute. When we register delegates on the Walled Garden, the data transferred to ILM includes names, contact details, employer information and qualification outcomes. ILM processes this data as a separate data controller in accordance with its own privacy notice, which is available at www.i-l-m.com.

4.2 Associate Trainers and Assessors

We work with a small number of associate trainers and assessors who deliver or assess on our behalf. We share delegate information with them to the extent necessary for the delivery of the programme and assessment of submitted work. Our associates are required to handle personal data confidentially and in accordance with our policies.

4.3 Client Organisations

Where a delegate has been sponsored by their employer to attend a programme, we will share progress information, assessment outcomes and certification status with the relevant contact at the client organisation. We will not share personal data with a client organisation beyond what is necessary for this purpose, and we

will not disclose information that a delegate has asked to be kept confidential without their consent, except where required by law.

4.4 Professional Advisers and Service Providers

We may share personal data with professional advisers (such as accountants or legal advisers) and service providers (such as IT support providers) where this is necessary for the operation of our business. All such third parties are required to keep the data confidential and are not permitted to use it for any other purpose.

4.5 Regulatory Bodies and Law Enforcement

We may disclose personal data to regulatory bodies, the ICO, HMRC, the police or other competent authorities where we are required to do so by law, or where disclosure is necessary to prevent or detect crime, protect the vital interests of an individual, or defend legal claims.

4.6 International Transfers

We do not routinely transfer personal data outside the United Kingdom. Where any transfer does occur (for example, where a service provider stores data on servers based outside the UK), we will ensure that appropriate safeguards are in place in accordance with UK GDPR, such as the UK International Data Transfer Agreement or equivalent standard contractual clauses.

5. How Long We Keep Personal Data

We retain personal data only for as long as is necessary for the purpose for which it was collected, or as required by law or professional obligations. Our general retention periods are set out below.

Type of Record	Retention Period
Delegate assignment work and assessment records (ILM accredited programmes)	Minimum 5 years from the date of completion or withdrawal
ILM registration and certification records	Minimum 5 years, in line with ILM centre requirements
Booking and financial records (invoices, payment records)	7 years from the end of the relevant financial year, in line with HMRC requirements
Attendance records and evaluation forms	3 years from the programme end date
Identity verification documents	Until certification is confirmed and for a reasonable period thereafter, normally no longer than 3 years
Complaint and appeal records	3 years from resolution
Malpractice and maladministration investigation records	Minimum 5 years or as required by ILM
General correspondence and email	3 years unless forming part of a record subject to a longer retention period
Website visitor data (logs and analytics)	12 months

Where personal data is no longer required, we will delete or anonymise it securely. Paper records are securely destroyed; electronic records are permanently deleted.

6. How We Protect Personal Data

We take the security of personal data seriously and maintain appropriate technical and organisational measures to protect it against accidental loss, unauthorised access, disclosure, alteration or destruction. Our security measures include:

- electronic records are held in password-protected systems, with access restricted to authorised personnel only;

- paper records are held in locked premises and are accessible only to relevant staff;
- all staff and associates who handle personal data are required to treat it as confidential and in accordance with our policies;
- devices used to access personal data are protected by appropriate security controls; and
- where third parties process data on our behalf, we require them to maintain equivalent security standards.

No method of transmission over the internet or method of electronic storage is 100% secure. Where you communicate with us electronically, please be aware that the security of information transmitted in this way cannot be guaranteed. We will, however, take all reasonable steps to protect any data you send to us.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the ICO within 72 hours of becoming aware of the breach, and will inform affected individuals without undue delay where required to do so.

7. Your Rights Under UK Data Protection Law

Under the UK GDPR and the Data Protection Act 2018, you have the following rights in relation to the personal data we hold about you. To exercise any of these rights, please contact us using the details in Section 8.

Right	What It Means
Right of access	You have the right to request a copy of the personal data we hold about you (a subject access request). We will respond within one month.
Right to rectification	You have the right to ask us to correct any personal data we hold about you that is inaccurate or incomplete.
Right to erasure	You have the right to ask us to delete your personal data where it is no longer necessary for us to hold it, where you have withdrawn consent (if consent was the basis for processing), or where we have no legitimate grounds to retain it. This right is subject to our legal and regulatory obligations.
Right to restriction	You have the right to ask us to restrict our processing of your data in certain circumstances, for example while a complaint or challenge is being investigated.
Right to data portability	Where processing is based on consent or a contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, machine-readable format.
Right to object	You have the right to object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests, or the processing is necessary for the establishment, exercise or defence of legal claims. You may also object at any time to processing for direct marketing purposes.
Right not to be subject to automated decisions	You have the right not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects. We do not carry out automated decision-making of this kind.
Right to withdraw consent	Where we rely on your consent as the basis for processing, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

We will respond to all rights requests within one month of receipt. In some circumstances, this period may be extended by up to a further two months where requests are complex or numerous; we will notify you if this is the case. There is no charge for making a rights request, unless requests are manifestly unfounded or excessive, in which case we may charge a reasonable fee or refuse to respond.

8. How to Contact Us and How to Complain

8.1 Contacting Us

If you have any questions about this Privacy Policy, wish to exercise any of your rights, or have a concern about how we handle your personal data, please contact:

Contact name	Malin Patel
Role	Director, Stand & Deliver Learning & Development
Address	Unit 313, Daisyfield Business Centre, Appleby Road, Blackburn, BL1 3BL
Telephone	07764 309441
Email	info@standanddeliver.co.uk

We will acknowledge your request promptly and aim to provide a substantive response within one month.

8.2 Complaints to the ICO

If you are not satisfied with our response to your concern, or you believe that we are not handling your personal data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

ICO website	www.ico.org.uk
ICO helpline	0303 123 1113
ICO address	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would, however, appreciate the opportunity to address your concerns before you approach the ICO, and ask that you contact us in the first instance.

9. Marketing Communications

From time to time, we may send information about our programmes, services and events to existing clients and delegates. We do this on the basis of our legitimate interests in promoting our business to individuals with whom we have an existing relationship.

You can opt out of receiving marketing communications from us at any time by:

- contacting us at info@standanddeliver.co.uk and asking to be removed from our mailing list; or
- clicking any unsubscribe link included in an email communication from us.

We will process your opt-out request promptly and will not send you further marketing communications once you have opted out. Opting out of marketing will not affect the communications we send you in connection with an existing booking or programme.

We do not share personal data with any third party for their marketing purposes.

10. Links to Third-Party Websites

Our website may contain links to the websites of ILM, City & Guilds and other third parties. These websites operate under their own privacy policies, for which we are not responsible. We encourage you to review the privacy policy of any website you visit via a link from our site.

11. Cookies

Our website uses cookies to distinguish you from other users and to improve your experience when browsing. A cookie is a small file of letters and numbers stored on your browser or the hard drive of your computer if you agree to the use of cookies.

We use the following types of cookies:

- **Strictly necessary cookies:** These are required for the operation of our website and cannot be switched off. They include cookies that enable you to log into secure areas.
- **Analytical or performance cookies:** These allow us to count visits and traffic sources so that we can measure and improve the performance of our website. All information collected is aggregated and anonymous.
- **Functionality cookies:** These allow our website to provide enhanced functionality. If you disable them, some or all services may not function properly.

You can set your browser to refuse some or all browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

We will request your consent before placing any non-essential cookies on your device, in accordance with the Privacy and Electronic Communications Regulations 2003 (as amended).

12. Children

Our programmes are designed for working adults and professionals. We do not knowingly collect personal data from children under the age of 18. If you believe that a child has provided us with personal data without appropriate consent, please contact us so that we can take appropriate action.

13. Changes to This Privacy Policy

We review this Privacy Policy at least once a year and update it when necessary to reflect changes in our practices, our services, or applicable law. The current version is always available on our website at www.standanddeliver.co.uk and on request.

Material changes to this Policy will be communicated to affected individuals by email or via a notice on our website. The date of the most recent revision is shown at the top of this Policy and in the footer of each page.

Version	1.0
Date issued	June 2026
Next review	June 2027
Authorised by	Malin Patel, Director, Stand & Deliver Learning & Development

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