

# The GTA Data Protection & Retention Policy

This policy applies to all members and associates of the GTA

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Signature:



Approved By: J. Mace  
Position: CEO  
Date: 20/01/2025

## Privacy and Data Retention Policy

### Doncaster, Rotherham and District Motor Trades GTA Ltd (GTA)

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#### 1. Introduction

Doncaster, Rotherham and District Motor Trades GTA Ltd (“we,” “us,” “our”) is committed to protecting the privacy and security of personal data. This Privacy Policy outlines how we collect, use, store, and protect personal data in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We also process **special category data** (e.g., disabilities, safeguarding, and educational support needs) to ensure appropriate accommodations and support for apprentices. This processing is carried out under specific legal bases and safeguards as outlined in Article 9 of the GDPR.

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#### 2. Scope

This policy applies to all personal data processed by us, including data related to:

- Learners and apprentices
  - Employers
  - Staff and contractors
  - Other stakeholders engaged in our training and apprenticeship programs
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#### 3. Data We Collect

We may collect and process the following categories of personal data:

- **Learner Data:**  
Name, date of birth, address, contact details, National Insurance number, education history, progress records, assessment results (including functional skills test results if applicable), information on educational support needs, and details of disabilities to ensure appropriate accommodations are made during their training.
- **Employer Data:**  
Company details, contact information, and contracts.
- **Staff Data:**  
Employment records, payroll details, and training logs.
- **Financial Data:**  
Invoices, bank account details, and funding records.
- **Safeguarding Data:**  
Incident reports, emergency contact details, and medical information (if applicable).

**Special category data** (e.g., disabilities and safeguarding information) is processed under explicit consent or where necessary to comply with obligations under employment, education, or social care laws.

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## 4. How We Use Personal Data

We use personal data for:

- Delivering training and apprenticeship programs.
- Providing appropriate support for learners with disabilities or educational support needs.
- Communicating with learners, employers, and stakeholders.
- Submitting funding claims to the Education and Skills Funding Agency (ESFA).
- Complying with statutory and regulatory obligations.
- Monitoring and improving our services.
- Ensuring safety and safeguarding.

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## 5. Legal Basis for Processing

We process personal data based on the following legal bases:

- **Consent:**  
For specific purposes such as marketing communications or processing special category data (e.g., disabilities).
- **Contractual Obligation:**  
To provide apprenticeship and training services.
- **Legal Obligation:**  
To comply with regulatory requirements.
- **Legitimate Interest:**  
For operational efficiency and service improvements.

For **special category data**, we rely on Article 9 of the GDPR, using explicit consent or as necessary for compliance with laws in the fields of employment, education, or social care.

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## 6. Data Sharing

We may share personal data with:

1. **Employers**  
To coordinate and deliver training and apprenticeship programs.
2. **Awarding Bodies**  
To facilitate certification and qualification processes, including:
  - **City & Guilds** – Privacy Statement:  
<https://www.cityandguilds.com/help/privacy-statement>
  - **OCR** – Privacy Policy:  
<https://www.ocr.org.uk/privacy/>
  - **The Skills Education Group (SEG)** – Privacy Policy:  
<https://www.skillsedugroup.co.uk/privacy-policy>
  - **IMI (Institute of the Motor Industry)** – Privacy Policy:  
<https://www.theimi.org.uk/privacy-policy>

- **RTITB** – Privacy Policy:  
<https://www.rtitb.com/privacy-policy/>
  - **DVSA (Driver and Vehicle Standards Agency)** – Privacy Policy:  
<https://www.gov.uk/government/organisations/driver-and-vehicle-standards-agency/about/personal-information-charter>
  - **SQA (Scottish Qualifications Authority)** – Privacy Statement:  
<https://www.sqa.org.uk/sqa/45397.html>
3. **Funding Bodies**  
Including the Education and Skills Funding Agency (ESFA): Privacy Notice  
<https://www.gov.uk/government/publications/esfa-privacy-notice>
4. **Regulatory Bodies**  
Such as Ofsted: Privacy Policy  
<https://www.gov.uk/government/organisations/ofsted/about/personal-information-charter>
5. **Service Providers**  
Including IT support and subcontractors such as:
- Active IT Systems: available upon request
  - Pellcomp Software – Privacy Policy:  
<https://www.pellcomp.co.uk/privacy/>
  - Pass Functional Skills: available upon request
6. **Law Enforcement or Safeguarding Authorities**  
When required by law or to protect the safety and welfare of individuals.
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## 7. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected and to comply with legal, regulatory, and contractual obligations. Retention periods are based on the following categories and also cover any data that may be collected or processed through Pass Functional Skills as part of a learner’s academic record or progress.

### 7.1 Retention Periods for Key Data Categories

- **Learner and Apprentice Data**
  - Personal and academic records (e.g., contact details, progress records, assessment results, functional skills test results): **6 years** after program completion.
  - Educational support and safeguarding records: **Until the learner reaches 25 years of age.**
  - Apprenticeship funding records (e.g., Individual Learning Records): **10 years** post-final ESFA claim (in compliance with ESFA funding rules).
- **Employer Data**
  - Contracts and correspondence: **6 years** after the completion of the apprenticeship program.
- **Staff Data**
  - Employment records (e.g., contracts, appraisals, performance records): **6 years** after employment ends.
  - Payroll and benefits records: **6 years** (for HMRC compliance).
- **Financial Data**
  - Invoices and payment records: **6 years** (for HMRC compliance).
- **Safeguarding Data**
  - Incident reports and related documentation: **Until the learner reaches 25 years of age.**

## 7.2 Document Archiving and Destruction

- **Review Schedule:**  
Data is reviewed annually to identify records that have reached their retention limit.
- **Secure Disposal:**
  - Physical records (e.g., paper files): Shredded and disposed of as confidential waste.
  - Digital records: Permanently erased using secure data destruction software.

## 7.3 Exceptions to Standard Retention Periods

In specific circumstances, data may be retained longer than standard periods, such as:

- If an ongoing legal or employment dispute requires retention.
- When regulatory or audit requirements necessitate extended retention.
- If consent has been provided for longer retention (e.g., for marketing purposes).

## 7.4 Documentation of Retention Actions

A log is maintained to record details of data destruction and archiving activities, including:

- Date of action.
  - Type of data destroyed or archived.
  - Method of destruction or archiving.
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## 8. Data Security

We employ measures to safeguard personal data, including:

- Encryption for digital data storage.
- Secure physical storage for paper records.
- Regular staff training and system audits to enhance data protection.

We conduct Data Protection Impact Assessments (DPIAs) for processing special category data, ensuring risks to data subjects are identified and mitigated.

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## 9. Your Rights

Under GDPR, individuals have the right to:

- **Access:** Request access to personal data we hold.
- **Rectification:** Correct any inaccurate or incomplete data.
- **Erasure:** Request deletion of personal data (subject to legal obligations).
- **Restriction:** Limit the processing of personal data.
- **Portability:** Transfer personal data to another organisation.
- **Objection:** Object to certain types of data processing.

To exercise these rights, contact us via the details provided in Section 12.

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## 10. Cookies

Our website uses cookies to enhance user experience and analyse website traffic. For further details, refer to our Cookie Policy.

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## 11. Complaints

If you believe your data has not been handled appropriately, you can contact the Information Commissioner's Office (ICO):

<https://ico.org.uk>

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## 12. Contact Us

### Data Protection Officer (DPO):

**Name:** Jon Mace (CEO)

**Address:** Doncaster, Rotherham and District Motor Trades GTA Ltd  
Rands Lane Industrial Estate  
Armthorpe  
DN3 3DY

**Email:** jonmace@doncastergta.co.uk

**Phone:** 01302 832831

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## 13. Policy Updates

This Privacy Policy is reviewed regularly and updated as needed. Any changes will be communicated and published on our website.