# GDPR and Privacy Policy

**Purpose and Scope**

Showcase Training Ltd is committed to protecting personal information and handling it lawfully, fairly, transparently and securely. This policy explains how we collect, use, share, store and protect personal data relating to learners, applicants, employees, employers, prospective employees, website users and other individuals we work with.

This policy should be read alongside any specific privacy notice, consent statement, funding documentation or terms provided when personal information is collected.

**Data Controller and Data Protection Officer**

Showcase Training Ltd is the data controller for personal information where we determine why and how that information is processed. Organisations that process information on our behalf may act as data processors. In some circumstances, another organisation, such as the Department for Education (DfE), may be a separate data controller for information we are required to share with it.

The nominated Data Protection Officer is Ellen Roberts. Questions, requests or concerns about the use of personal information can be sent to hello@showcasetraining.co.uk or to Showcase Training Ltd, Unit 77 Merlin House, 4 Meteor Way, Daedalus Drive, Fareham, Hampshire, PO13 9FU. Telephone: 0330 320 9230.

**Legal Framework**

We process personal information in accordance with applicable UK data protection law, including:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations 2003 (PECR), where applicable

We also follow relevant DfE funding, Individualised Learner Record (ILR), awarding organisation and contractual requirements.

**Data Protection Principles**

Personal data will be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where necessary
- Kept for no longer than necessary
- Protected using appropriate technical and organisational security measures
- Managed in a way that allows Showcase Training to demonstrate accountability.

**Information We Collect**

Depending on our relationship with you, we may collect information including:

- Name, date of birth, contact details and address
- Identity, residency, nationality and funding eligibility evidence
- Education, qualifications, employment and learning history
- Learner, apprenticeship, attendance, progress, assessment, achievement and destination information
- Employer, manager, mentor and workplace information
- Recruitment information including applications, cvs, interview information and vacancy matching
- Financial or funding information where required
- Next of kin or emergency contact information
- Website, communications, survey and marketing preferences

- Staff recruitment, employment, payroll, training and performance information.

**Special Category and Sensitive Information**

Where necessary and lawful, we may process special category information such as racial or ethnic origin, religious or philosophical beliefs, health information, disability, sexual orientation or other information required for statutory reporting or to provide appropriate support. We may also process information relating to criminal convictions where this is necessary and lawful, for example as part of safer recruitment or safeguarding arrangements.

We will only collect this information where there is an appropriate lawful basis and, where required, an additional condition for processing special category or criminal offence data. Information disclosed about health, disability or learning needs may be used to arrange reasonable adjustments, learning support or safeguarding support.

**Why We Use Personal Information**

We may use personal information to:

- Respond to enquiries and applications
- Assess eligibility for learning, funding and apprenticeship programmes
- Recruit learners and match applicants to apprenticeship vacancies
- Enrol learners and deliver, assess and quality assure learning
- Provide learning support, reasonable adjustments, pastoral support and safeguarding
- Register learners with awarding organisations and end-point assessment organisations
- Maintain e-portfolio, assessment and management information records
- Submit required information to the dfe and other funding or regulatory bodies
- Communicate with learners, employers, staff and other relevant parties
- Manage complaints, appeals, disciplinary matters and quality assurance
- Manage staff recruitment and employment
- Meet legal, contractual, audit and regulatory obligations
- Improve our services and produce appropriate management information and statistics
- Send marketing communications where we have a lawful basis to do so.

**Lawful Bases for Processing**

The lawful basis used depends on the purpose of the processing. We may rely on:

- Contract, where processing is necessary to enter into or perform a contract
- Legal obligation, where we must process information to comply with the law
- Public task, where processing is necessary for a task carried out in the public interest or under official authority and this basis applies to the relevant processing
- Legitimate interests, where processing is necessary for our legitimate interests or those of another organisation and those interests are not overridden by the individual's rights
- Consent, where the law requires or it is appropriate for an individual to make a genuine choice
- Vital interests, in exceptional circumstances where processing is necessary to protect someone's life.

We will not describe consent as the lawful basis where information must be collected or shared because of a legal, contractual or funding requirement.

**Learners and Apprentices**

We collect and process information required to establish eligibility, enrol learners, deliver training and assessment, provide support and meet funding and regulatory requirements. Publicly funded providers must collect and return ILR data to the DfE. Learners will be provided with, or directed to, the current DfE ILR privacy notice as part of enrolment.

Information may be recorded within our management information, e-portfolio, initial assessment, learning and communications systems. Access is restricted to people who need the information for their role.

**Apprenticeship Applicants and Vacancies**

Where Showcase Training supports recruitment to apprenticeship vacancies, we may receive applicant information directly, through the government apprenticeship recruitment service or through other recruitment channels. We use this information to screen applications, communicate with candidates, manage vacancy matching and, where appropriate, share candidate information with prospective employers.

Candidate information will only be shared with an employer where there is an appropriate basis to do so and the candidate has been informed. Recruitment information may be held within our customer relationship management system and other secure recruitment systems.

**Employers and Partners**

We process employer and workplace contact information to manage apprenticeship delivery, learner support, progress reviews, funding requirements, quality assurance and communications. Where appropriate, and subject to data protection and confidentiality requirements, relevant learner information may be shared with employers to support the apprenticeship and workplace learning.

**Who We Share Information With**

Where necessary and lawful, personal information may be shared with organisations including:

- The Department for Education and associated government services
- The Student Loans Company where relevant to Advanced Learner Loans
- Awarding organisations and end-point assessment organisations
- E-portfolio, management information, initial assessment, communications and other technology providers acting on our behalf
- Employers and prospective employers
- Ofsted, auditors, regulators and funding assurance bodies
- Local authorities, safeguarding partners, emergency services or other agencies where required to protect an individual or meet a legal duty
- Professional advisers, insurers and other service providers where necessary.

We require organisations processing personal data on our behalf to protect it appropriately and only process it in accordance with our instructions and applicable law.

**International Transfers**

Some technology providers may process or store personal information outside the UK. Where this occurs, we will ensure that an appropriate transfer mechanism and safeguards are in place as required by UK data protection law.

**Website, Cookies and Marketing**

Our website may use cookies and similar technologies. Where consent is required, users will be given a choice before non-essential cookies are placed. Some limited-purpose cookies may be used without consent where permitted by law. Further information should be provided through the website cookie information or consent tool.

We will only send electronic direct marketing where we have an appropriate lawful basis and comply with PECR. Individuals can change their marketing preferences or unsubscribe at any time.

**Photographs, Video and Social Media**

We may ask learners, staff or other individuals for permission to use photographs, video or success stories for publicity, social media or marketing. Where consent is the appropriate basis, participation is voluntary and the intended use will be explained. Safeguarding and additional consent requirements will be considered for children and young people.

**Automated Decision-Making and Profiling**

Showcase Training does not currently make decisions that produce legal or similarly significant effects about individuals solely by automated means. If this changes, we will provide appropriate information about the processing and the rights available to individuals.

**Individual Rights**

Depending on the circumstances and lawful basis, individuals may have rights to:

- be informed about how their information is used
- Access their personal information
- Have inaccurate information corrected
- Request erasure of information in certain circumstances
- Request restriction of processing in certain circumstances
- Object to certain processing
- Receive or transfer certain information in a portable format
- Withdraw consent where processing relies on consent
- Challenge certain solely automated decisions.

These rights are not absolute and some may not apply where we are required to retain or process information for legal, funding, safeguarding or contractual reasons. We may need to verify identity before responding to a request.

**Data Protection Complaints**

Anyone who has concerns about how Showcase Training has handled their personal information can contact the Data Protection Officer using the details in this policy. We will acknowledge, investigate and respond to data protection complaints in line with applicable legal requirements and will keep an appropriate record of the complaint and outcome.

Individuals also have the right to complain to the Information Commissioner's Office (ICO). Information about raising a concern is available from the ICO at ico.org.uk or by telephone on 0303 123 1113.

**Security and Confidentiality**

We use proportionate technical and organisational measures to protect personal information against unauthorised access, loss, alteration, disclosure or destruction. Measures include access controls, secure systems, staff training, password and authentication controls, secure disposal arrangements and cyber security measures. Showcase Training maintains Cyber Essentials certification as part of its approach to cyber security.
Staff must only access personal information where this is required for their role and must follow Showcase Training policies and procedures when handling information away from the office or using portable devices.

**Personal Data Breaches**

All staff must report an actual or suspected personal data breach to the Data Protection Officer immediately. This includes loss of information, unauthorised access, disclosure to the wrong person, loss or theft of a device, alteration without permission or loss of availability of personal data.

The Data Protection Officer will assess the nature and impact of the breach, take steps to contain it, record the incident and determine whether notification is required. Where required by law, Showcase Training will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Where a breach is likely to result in a high risk to individuals, affected individuals will also be informed without undue delay.

**Retention and Secure Disposal**

We retain personal information only for as long as necessary for the purpose for which it was collected and to meet applicable legal, contractual, funding, audit and quality requirements. Different categories of information therefore have different retention periods.

DfE ILR information is subject to the DfE's own retention arrangements. The current DfE ILR privacy notice states that ILR learner data is retained by the DfE for 20 years for operational purposes and then in research databases until the learner is aged 80. Showcase Training will maintain its own retention schedule for records for which it is the controller and will securely delete or destroy information when the applicable retention period ends.

**DfE ILR Privacy Notice**

The DfE requires providers to ensure learners have seen the current ILR privacy notice as part of enrolment. The 2026 to 2027 notice explains how the Secretary of State for Education uses ILR information, the lawful bases relied upon by the DfE, data sharing, retention and learner rights. Showcase Training will provide or signpost the current version rather than reproduce a fixed copy within this policy, so that learners receive the most up-to-date wording.

**Policy Monitoring and Review**

This policy will be reviewed at least annually and sooner where there are significant changes to legislation, regulatory guidance, funding requirements, systems or the way Showcase Training processes personal information.

| Issue | Issue Date | Author | Revision Notes |
|---|---|---|---|
| 1 | 01/12/2015 | Luke Bailey | 1st Issue |
| 2 | 05/08/2016 | Ellen Mould | Policy revised |
| 3 | 05/03/2018 | Ellen Mould | First revision pre-GDPR |
| 4 | 21/03/2018 | Ellen Mould | Full revision to include GDPR duties |
| 5 | 05/04/2018 | Ellen Mould | Policy revised |
| 6 | 29/10/2018 | Ellen Mould | Policy revised |
| 7 | 28/01/2019 | Ellen Mould | Policy reviewed |
| 8 | 15/04/2020 | Ellen Mould | Policy reviewed |
| 9 | 24/06/2021 | Ellen Mould | Cyber Essentials included |
| 10 | 08/08/2022 | Ellen Mould | Policy updated including contact details |
| 11 | 07/03/2023 | Ellen Mould | Revision for clarity |
| 12 | 19/04/2023 | Ellen Mould | Policy reviewed |
| 13 | 23/05/2024 | Ellen Roberts | Policy reviewed |
| 14 | 27/08/2025 | Ellen Roberts | Policy reviewed |
| 15 | 24/09/2026 | Ellen Roberts | Full review and rewrite. Updated UK data protection framework, DfE ILR wording, retention, complaints, |

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