

Data Protection and GDPR Policy

Reviewed: February 2026

PART ONE

General Statement of Policy, Duties & Responsibilities

1.1 Policy Statement

Vertex Learning Hub is committed to protecting the privacy, confidentiality, and rights of individuals whose personal data we collect, store, and process. We recognise our legal and ethical responsibility to handle personal data lawfully, fairly, and transparently in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Data Protection & GDPR Policy sets out how Vertex Learning Hub ensures compliance with data protection legislation and demonstrates accountability in the way personal data is managed, stored, shared, and protected.

This policy applies to all staff, associate trainers, contractors, learners, and any third parties who process personal data on behalf of Vertex Learning Hub.

This policy will be reviewed annually or sooner in response to legislative change, data breaches, or organisational review.

1.2 Aims of the Policy

The aims of this policy are to:

- Ensure compliance with UK GDPR and the Data Protection Act 2018;
- Protect the rights and freedoms of individuals;
- Ensure personal data is handled securely and responsibly;
- Promote good data protection practice across the organisation;
- Reduce the risk of data breaches and misuse.

PART TWO

Key Definitions

2.1 Personal Data

Personal data refers to any information relating to an identified or identifiable living individual, including names, contact details, identification numbers, and online identifiers.

2.2 Special Category Data

Special category data includes information relating to:

- Health
- Disability
- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation

Such data requires additional protection and safeguards.

PART THREE

Data Protection Principles

Vertex Learning Hub processes personal data in accordance with the UK GDPR principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

PART FOUR

Lawful Basis for Processing

Vertex Learning Hub will identify and document a lawful basis for processing personal data, which may include:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

Special category data will only be processed where an additional lawful condition applies.

PART FIVE

Roles and Responsibilities

5.1 Director / Centre Lead

The Director or Centre Lead is responsible for:

- Overall compliance with data protection legislation;
- Ensuring appropriate policies and procedures are in place;
- Managing serious data protection risks or breaches;
- Ensuring staff receive appropriate data protection training.

5.2 Data Protection Lead

Vertex Learning Hub will appoint a Data Protection Lead who will:

- Oversee day-to-day data protection compliance;
- Act as the point of contact for data protection queries;
- Maintain data processing records;
- Support data protection impact assessments (DPIAs);
- Liaise with the Information Commissioner's Office (ICO) where required.

5.3 Staff and Associates

All staff and associates must:

- Handle personal data in line with this policy;
- Maintain confidentiality at all times;
- Use secure systems and passwords;
- Report data breaches or concerns immediately;
- Complete data protection training as required.

PART SIX

Data Subject Rights

Individuals have the right to:

- Be informed about how their data is used;
- Access their personal data;
- Request rectification of inaccurate data;
- Request erasure (where applicable);
- Restrict or object to processing;
- Data portability;
- Lodge a complaint with the ICO.

Vertex Learning Hub will respond to subject access requests within statutory timescales.

PART SEVEN

Data Security and Storage

Vertex Learning Hub will:

- Store data securely, whether electronic or paper-based;
- Limit access to authorised individuals only;
- Use password protection and encryption where appropriate;
- Securely dispose of data when no longer required;
- Regularly review data retention periods.

PART EIGHT

Data Sharing

Personal data will only be shared:

- Where there is a lawful basis to do so;
- With awarding bodies, regulators, or partners where required;
- On a need-to-know basis;
- In line with data sharing agreements where appropriate.

PART NINE

Data Breaches

9.1 Reporting a Data Breach

A data breach includes any loss, unauthorised access, disclosure, or destruction of personal data.

All suspected or actual data breaches must be reported immediately to the Data Protection Lead.

9.2 Managing Data Breaches

Vertex Learning Hub will:

- Investigate all data breaches promptly;
- Take steps to minimise harm;
- Record breaches in a breach log;
- Report breaches to the ICO within 72 hours where required;
- Inform affected individuals where necessary.

PART TEN

Training, Monitoring and Compliance

Vertex Learning Hub will:

- Provide data protection training to staff;
- Monitor compliance through audits and reviews;
- Review policies and procedures regularly;
- Take action where non-compliance is identified.

PART ELEVEN

Policy Review and Communication

This policy will be:

- Communicated to all staff and learners;
- Made available on request;
- Reviewed annually;
- Updated in response to legislative or organisational change.

Approved by Vertex Learning Hub Management

Signed: _____

(Director / Centre Lead)

Date: _____