

Data Protection and GDPR Policy

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Data Protection and GDPR Policy

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Signed: 

Position: Director

1. Introduction

1.1 Policy Statement

Rapid Improvement Limited collects, stores and processes personal data relating to learners, staff, employers, corporate clients and other data subjects in order to carry out its functions as an education and training provider. The organisation is committed to ensuring that all personal data is handled lawfully, fairly and transparently, and in full compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

All staff, contractors and third parties acting on behalf of Rapid Improvement Limited are required to comply with this policy and with the organisation's data protection procedures at all times.

Under UK GDPR, personal data must be processed in accordance with the data protection principles.

These require that personal data is:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary;
- processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Rapid Improvement Limited is also accountable for demonstrating compliance with these principles.

1.2 Definitions

For the purposes of this policy:

- "Personal data" means any information relating to an identified or identifiable individual.
- "Special category data" includes sensitive data such as health information, ethnicity, religion or biometric data.
- "Processing" refers to any operation performed on personal data, including collection, storage, use, sharing or deletion.
- "Data subject" refers to the individual to whom the personal data relates.

This policy applies to all data subjects, including current, former and prospective learners, staff, employers, contractors and partners.

2. Notification of Data Held

Rapid Improvement Limited provides clear and accessible privacy information to all data subjects explaining what data is collected, how it is used, the lawful basis for processing and how long it is retained. This is typically provided through privacy notices at the point of data collection.

Where personal data is to be used for a new purpose not previously communicated, the organisation will update its privacy notice and inform the relevant data subjects before processing begins.

3. Responsibilities

3.1 Responsibilities of Data Subjects

Individuals whose data is held by Rapid Improvement Limited are expected to ensure that the information they provide is accurate and kept up to date. They should notify the organisation promptly of any changes to their personal details and check information provided to them to ensure its accuracy.

3.2 Responsibilities of Staff

All staff have a responsibility to ensure that personal data is handled appropriately and securely at all times. In particular, staff must ensure that personal data is only accessed where necessary for their role, is not disclosed to unauthorised individuals, and is stored securely in accordance with organisational procedures.

Any actual or suspected data breach must be reported immediately in line with the organisation's data breach procedures. Failure to comply with this policy may result in disciplinary action and, in serious cases, may constitute gross misconduct.

3.3 Responsibilities for Learner Activities

Where learners are involved in activities that require the processing of personal data, staff must ensure that they are appropriately supervised and understand their responsibilities under data protection law, including the importance of confidentiality and lawful processing.

4. Learner Responsibilities

Learners are required to provide accurate and up-to-date personal information and to inform the organisation of any changes. They must also respect the confidentiality of any personal data they may encounter during their learning or work placement activities.

5. Rights of Data Subjects

Under UK GDPR, individuals have a number of rights in relation to their personal data. These include the right to access, rectify, erase, restrict processing, object to processing and, where applicable, the right to data portability.

Requests to exercise these rights should be made in writing to the organisation. Rapid Improvement Limited will respond to such requests within one calendar month, unless an extension is permitted under the legislation.

No fee will normally be charged for handling a request unless it is manifestly unfounded or excessive.

6. Lawful Basis and Consent

Rapid Improvement Limited will only process personal data where there is a lawful basis to do so under UK GDPR. These lawful bases may include the performance of a contract, compliance with a legal obligation, legitimate interests or consent.

Where consent is relied upon, it will be freely given, specific, informed and unambiguous. Individuals have the right to withdraw consent at any time, and this will be clearly communicated to them.

Special category data, including health information, will only be processed where additional conditions under UK GDPR are met, such as where processing is necessary for health and safety, safeguarding or equality monitoring purposes.

7. Data Controller and Accountability

Rapid Improvement Limited acts as the Data Controller and is responsible for determining the purposes and means of processing personal data.

A designated company director has operational responsibility for data protection compliance, including oversight of policies, procedures, training and data breach management. The organisation will also maintain appropriate records of processing activities to demonstrate compliance.

8. Assessment Data and Certification

Learners are entitled to access information relating to their assessment outcomes and certification. This information will be processed and shared with awarding organisations where necessary for certification and regulatory purposes.

9. Data Retention

Personal data will only be retained for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, funding, audit and awarding organisation requirements.

Retention periods are defined within the organisation's data retention schedule and are regularly reviewed to ensure compliance with legal and regulatory expectations.

10. Data Security

Rapid Improvement Limited implements appropriate technical and organisational measures to protect personal data. This includes secure storage systems, access controls, encryption where appropriate, and staff training in data protection and information security.

Data breaches will be managed in accordance with the organisation's data breach procedure, including notification to the Information Commissioner's Office (ICO) where required.

11. Data Sharing

Personal data may be shared with third parties where necessary for the delivery of education and training, including awarding organisations, funding bodies (such as the Greater London Authority), employers and regulatory bodies.

All data sharing will be carried out in accordance with data protection legislation and supported by appropriate agreements where required.

12. International Transfers

Personal data will not normally be transferred outside the UK unless appropriate safeguards are in place, in line with UK GDPR requirements.

13. Compliance and Breaches

Compliance with this policy is mandatory for all staff and learners. Any breach of this policy may result in disciplinary action and, where appropriate, legal action.

Any individual who believes that their personal data has been handled inappropriately should raise the matter through the organisation's complaints procedure. They also have the right to lodge a complaint with the Information Commissioner's Office.

14. Review and Evaluation

This policy will be reviewed annually, or sooner where there are significant changes to legislation, regulatory requirements or organisational practices. Responsibility for review sits with the nominated senior leader responsible for data protection.

15. Relevant Legislation

This policy is written in accordance with current UK legislation and guidance, including:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Privacy and Electronic Communications Regulations (PECR)
- Freedom of Information Act 2000 (where applicable)
- Human Rights Act 1998