

# External Data Protection Policy



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## VERSION CONTROL

Version number	Summary of change	Date changed
V1	Policy creation	December 2024
V2	New policy template and policy review.	June 2025

## INTRODUCTION

CTQ is committed to protecting personal data that is collected and processed during the delivery and awarding of its qualifications. This includes data provided by centres, learners, centre staff, and third-party stakeholders. We are responsible for handling personal data in line with the Data Protection Act 2018 and UK GDPR.

This policy explains:

- What data we collect and why
- How long we keep it
- Where and how it is stored

This policy also outlines the responsibilities of centres and EQAs, including learner identity verification and data handling during assessment and external quality assurance activities.

## SCOPE

This policy applies to all personal data collected and processed by CTQ in relation to the delivery of regulated qualifications. It covers:

- Learner personal information
- Centre staff details
- Data used to verify learner identity
- Assessment and certification records

This policy applies to:

- CTQ employees and contractors
- Approved centres
- External Quality Assurers (EQAs)
- Learners registered on CTQ qualifications

- Third parties with a legitimate interest (e.g. regulators, system suppliers)

This policy does **not** cover complaints, appeals, or malpractice/maladministration, which are addressed in separate policies. All are available to download from the CTQ website – <https://ctq.org.uk/>

## ACTIVITY

This section explains how CTQ and its approved centres collect, process, and manage personal data. It outlines our requirements for data collection, learner identification, storage, retention, and security, as well as the steps taken to manage risks such as unauthorised access or data breaches. These activities are integral to maintaining the integrity of CTQ's qualifications and meeting our regulatory obligations.

## DATA COLLECTION AND USE

We collect and process personal data only where there is a lawful basis to do so. These may include consent, performance of a contract, legal obligation, or legitimate interest.

See Appendix 1 for a detailed table of data types, sources, reasons, and how the data may be shared.

Data is used to:

- Register and certificate learners
- Confirm learner identity
- Monitor assessment decisions
- Fulfil regulatory and legal obligations
- Enable centre approval and staff verification

We may share data with:

- Regulators (e.g. Ofqual, DfE, ESFA)
- External IT suppliers or hosting providers
- Governing board
- Other Awarding Organisations
- Insurers or legal authorities, as required

All parties with whom we share personal data are contractually bound by confidentiality and data protection clauses.

## LEARNER IDENTIFICATION REQUIREMENTS

Centres are responsible for confirming learner identities during registration. This may involve collecting sufficient personal data and the learner's ULN to ensure they are uniquely identified.

Before assessments, centres must check and record the type of identification provided by each learner. CTQ will review these records during External Quality Assurance (EQA) monitoring.

### Acceptable forms of ID include:

- Valid passport (any nationality)
- UK-issued Biometric Residence Permit
- Signed UK photocard driving licence
- Valid warrant card (e.g., HM Forces or Police)
- Current employee, student, or travel ID card

If a learner is assessed in their workplace and cannot provide standard ID, authentication by a third-party representative, such as a line manager or HR representative, is acceptable.

## RETENTION AND SECURITY OF PERSONAL DATA

Learner records must be retained for **a minimum of three years** by centres.

CTQ will retain learner data for **50 years from the registration date**, whether or not the qualification is completed.

This includes:

- Assessment outcomes
- Registration and certification details
- Records of reasonable adjustments
- Appeals or complaints linked to a learner

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. We limit access to personal information to those who have a genuine business need to know it. Those processing personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify the person(s) affected and any applicable regulator of a suspected data security breach, where we are legally required to do so.

If you identify a potential or actual data security breach relating to CTQ's systems, please contact CTQ by email at [quality@ctq.org.uk](mailto:quality@ctq.org.uk) immediately.

## DATA STORAGE AND INTERNATIONAL TRANSFERS

Data may be stored:

- On CTQ internal systems
- By third-party service providers (e.g. cloud-based platforms)
- By approved centres

In future, data may be transferred outside the UK/EEA if centres operate internationally. If this occurs, CTQ will implement safeguards, including:

- Transfer to countries with an adequacy decision
- Use of Standard Contractual Clauses
- Ensuring US transfers are only under valid data protection mechanisms

You have the right to:

- Access your personal data
- Request corrections to inaccurate information
- Request erasure of data in some cases ('right to be forgotten')
- Object to certain types of processing

Please contact CTQ via email to make a request. Further information will be provided on a case-by-case basis.

## ROLES AND RESPONSIBILITIES

The following RACI matrix outlines the roles and responsibilities for key activities within this policy, ensuring clarity on who is Responsible, Accountable, Consulted, and Informed.

Activity	Responsible	Accountable	Consulted	Informed
Ensure compliance with UK GDPR	All CTQ staff	Head of Quality and Operations	Responsible Officer	SLT
Verify learner ID	Centre staff	Centre	Learners, EQA	CTQ

during registration		manager		
Review ID verification during EQA monitoring	EQA	Head of Quality and Operations	Centre staff	CTQ
Retain and store learner data securely	Centres and CTQ	Head of Quality and Operations	IT Provider	Responsible Officer
Manage and report data breaches	Head of Quality and Operations	Responsible Officer	Legal / IT as required	Affected individuals, ICO
Respond to data access or erasure requests	Head of Quality and Operations	Responsible Officer	IT Provider	Data subject

## ESCALATION AND REPORTING

If you have concerns about how CTQ has handled your personal data, these should first be raised through CTQ's Complaints Policy, which sets out how we will investigate and respond.

If you remain dissatisfied with our response, you have the right to raise your concerns with the Information Commissioner's Office (ICO), the UK regulator for data protection. The ICO can investigate whether your data has been handled in line with the Data Protection Act 2018 and UK GDPR.

### ICO contact details:

Website: [ico.org.uk/concerns](https://ico.org.uk/concerns)

Telephone: 0303 123 1113

CTQ is committed to cooperating fully with the ICO in the event of any investigation or regulatory action. Where an ICO investigation highlights areas for improvement, we will implement appropriate corrective and preventative measures to strengthen our data protection practices.

## REVIEW AND REPORTING

All reported data protection concerns or breaches are logged and reviewed regularly to identify patterns, risks, and areas for improvement. Insights are shared with senior leadership as part of CTQ's governance arrangements, and where necessary, actions are

taken to strengthen processes, policies, and staff training to reduce the likelihood of recurrence.

## POLICY REVIEW

This policy is subject to a three-year review cycle, or earlier if feedback or concerns are raised with CTQ, to ensure it remains fit for purpose and its processes and outcomes are deliverable.

It will also be reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.

## REGULATORY CONDITIONS AND REQUIREMENTS

CTQ is committed to meeting the requirements set out by Ofqual's Conditions of Recognition.

CTQ will ensure:

- Policies and procedures align with regulatory conditions.
- All staff understand their obligations in relation to compliance.
- A robust system is in place to identify, manage, and mitigate risks to regulatory compliance.

The table below lists the conditions to which this policy applies.

Condition reference							
A1.2	A5.2	A8.7					



## APPENDIX 1 – ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Learner name, date of birth, gender, ethnic origin, nationality, CTQ learner number, unique learner number if in receipt of public funding in England (ULN), contact details (i.e. address, home and mobile phone numbers, email address).</p> <p>Learner registration and completion dates; Details of assessments, qualifications, components and standards achieved.</p> <p>Copy of a learner's photographic ID i.e. passport or driving licence</p>	<p>From CTQ approved Centres.</p> <p>In some circumstances learners may contact CTQ directly and provide this information</p> <p>From a learner during the video recording of remote proctoring sessions</p>	<p>For the purpose of performing our functions as an Awarding Organisation.</p> <p>The identification of a learner.</p> <p>There is a legitimate interest - to maintain learner and customer records and to comply with legal, regulatory and corporate governance obligations and good practice.</p> <p>The identification of a learner prior to sitting an exam</p>	<p>For the purpose of performing our functions.</p> <p>Data may be shared with our regulators, other educational bodies where appropriate and our external contractors / professional advisers/IT suppliers.</p>

Details of approved Centre staff, to include name, contact details i.e. home and mobile phone numbers, email address.	From CTQ approved Centres.	For the purpose of performing our function as an Awarding Organisation.	For the purpose of performing our functions.
All supporting documentation required to confirm Centre staff competency to deliver CTQ qualifications (i.e. CV, copy of qualification certificates)	In some circumstances Centre staff may contact CTQ directly and provide this information.	There is a legitimate interest -to maintain customer records and to comply with legal, regulatory and corporate governance obligations.	Data may be shared with our regulators, other educational bodies where appropriate and our external contractors/professional advisers.

You are required (by law, regulatory requirements or under the terms of your agreement with us, or in order to enter into an agreement with us) to provide the categories of information specified above to us where applicable, to enable us to provide you with the ability to deliver CTQ qualifications and to administer our learner and customer records. If you are unable to provide this information, we will not be able to:

- Approve you as an CTQ Centre to deliver our qualifications
- agree for you to deliver CTQ qualifications (this relates to the competency of Centre staff)
- register a learner for an CTQ qualification or component
- certificate a learner for an CTQ qualification or component