

Data Protection Policy – UK-GDPR

Contents:

- 1 General Statement of the Academy's Duties and Scope
- 2 Definitions
- 3 Accessibility of this document.
- 4 Data Protection Controller and Data Protection Officer
- 5 The Principles
- 6 Personal Data
- 7 Data Security and Storage
- 8 Rights of the Data Subject
- 9 Lawful Basis and Processing of Personal Data
- 10 Special Category Data
- 11 Criminal Convictions and Offences
- 12 Rights of Access to Information (Subject Access Request or 'SAR')
- 13 Exemptions
- 14 Accuracy
- 15 Enforcement
- 16 External Processors and Controllers
- 17 Secure Destruction
- 18 Retention of Data
- 19 Data Loss Events (Personal data Breaches)
- 20 Data Protection by Design and Default (DPIAs)
- 21 International Data Transfers

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1. General Statement of Reflections Duties and Scope

Reflections Training Academies processes personal data relating to staff, learners, applicants, emergency contacts, volunteers, clients, tenants and employer partners.

The organisation is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, ensuring that personal data is processed lawfully, fairly and transparently.

Reflections does not sell personal data and only obtains data for legitimate and lawful business purposes.

2. Definitions

- Reflections Training Academies" includes all training divisions and subcontractors.
- "Learners" – all persons studying or training with Reflections.
- "Staff" – all employees, temporary workers and volunteers.
- "Employers" – partner organisations involved in training delivery.
- "Clients" – individuals receiving salon or training services.
- "Tenants" – individuals or organisations renting company property.
- "Data Subject" – an identified or identifiable living individual.

https://reflectionstrainingacademy-my.sharepoint.com/personal/lucy_reflectionstraining_co_uk/Documents/Lucy/Polocies and Procedures 2026/GDPR/Data Protection Policy - GDPR - Version 6 January 2024.docx

10. "Personal Data" – information relating to an identifiable person.
11. "Special Category Data" – sensitive data such as health, ethnicity, religion.

3 Accessibility of this document.

This policy is written in clear and accessible language and is available via company systems, websites and upon request.

4 Data Protection Controller and Data Protection Officer

- **Data Protection Controller (DPC):** Director of Next Level Training
- **Data Protection Officer (DPO):** Quality of Divisional Data Development and Finance

The DPO operates independently and is responsible for monitoring compliance, advising on obligations and acting as a contact point.

5 The Principles

Reflections complies with the following principles:

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

6 Personal Data

Personal data includes employment, training and service-related information.

Further detail is provided in Privacy Notices.

7 Data Security and storage

Reflections applies appropriate security measures, including:

- Access controls
- Encryption where appropriate
- Secure IT systems

- Staff training
- Cyber security protections

Data must only be stored on approved systems.

The organisation will take appropriate technical and organisational steps to ensure the security of personal data. All staff will be made aware of this policy and their duties under the legislation. Reflections and therefore all staff, learners, employers and any other stakeholder are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are followed to ensure the unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to all personal data. Violations of this policy by staff may be treated as misconduct or gross misconduct in line with the Reflections company disciplinary procedure. An appropriate level of data security must be deployed for the type of data and the data processing being performed and necessary and appropriate data security systems are in place inclusive of Cyber Essentials the Government backed scheme that protects against a whole range of the most common cyber attacks. Personal data must be stored in appropriate company approved systems and should be encrypted when transported offsite. Some personal data however may be appropriate for publication or limited publication within the company, therefore having a lower requirement for data security, for example learner successes and awards, learner work, salon news articles.

8 Rights of the Data Subject

Individuals have the right to:

- Be informed
- Access their data
- Rectify inaccurate data
- Erase data
- Restrict processing
- Data portability
- Object to processing
- Protection from automated decision-making

Requests should be sent to: gdpr@reflectionstraining.co.uk

9 Lawful Basis and Processing of Personal Data

Processing is carried out under lawful bases including:

- Contract

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

Consent may be withdrawn at any time.

10 Special Category Data

Special category data is processed only where necessary and lawful, with additional safeguards applied.

11 Criminal Convictions and Offences.

The Reflections does not maintain registers of or process data on Criminal Convictions and offences, other than is required for the safeguarding purposes within its training divisions. Specifically, Enhanced DBS checks are required for all regulated activity staff within the training division. Where convictions or adverse findings are present that data is used as part of a staff recruitment risk assessment and recorded with in central register system Sentry.

Processing is limited to safeguarding and regulatory requirements such as DBS checks.

12 Rights of Access to Information (SARs)

Data subjects have the right of access and removal of their Personal data held by Reflections, subject to the provisions of current Data Protection legislation. Any data subject wishing to access their personal data should put their request in writing to the DPC or DPO via gdp@reflectionstraining.co.uk. Reflections will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, no longer than one month for access to personal data. The information will be made available to the data subject as soon as is reasonably possible after it has come to the Academy's attention and in compliance with the relevant legislation. Proof of identity is required before any information will be made available. Only the DPC or DPO can authorise a Subject Access Request. Any other staff receiving such a request MUST immediately pass it to the DPC / DPO for processing or refer the person making the request to the DPC / DPO

Where Reflections receives a Data Subject Request (or purported Data Subject Request) in relation to processing their data (submission of learner data): receives a request to rectify, block or erase any Personal Data processed through the submission of learner data; receives any other request, complaint or communication relating to their DfE data processing obligations under the Data Protection Legislation or receives any communication from the Information Commissioner or any other Regulatory Body in connection with Personal Data processed under the DfE Contract; receives a request from any third Party for disclosure of Personal Data where compliance with such

request is required or purported to be required by Law then notification in such cases should be given via the DfE Contract Manager;

13 Exemptions

Certain personal data or obligations are exempted from the some of the provisions of the Data Protection legislation which includes matters such as processing for National Security and Public Security, the prevention or detection and prosecution of criminal offences. The above are examples only of some of the some of the exemptions under the legislation. Any further information on exemptions should be sought from the DPC or DPO or via the Information Officers website <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

14 Accuracy

The Reflections will endeavour to ensure as far as reasonably practical that all personal data held in relation to all data subjects is accurate. Data subjects must notify the relevant salon or academy of any changes to information held about them.

15 Enforcement

If an individual believes that the Reflections has not complied with this policy or acted otherwise than in accordance with data protection legislation notify the DPC or DPO via gdpr@reflectionstraining.co.uk.

16 External Processors and Controllers

The Reflections will ensure that data processed by external processors, for example, service providers and Cloud services including storage, web sites are compliant with this policy and the relevant legislation. All external processors and controllers must be listed in the data processing register.

17 Secure Destruction

When data held in accordance with this policy is destroyed, it will be destroyed securely in accordance with best practice at the time of destruction.

18 Retention of Data

The Reflections may retain data for differing periods of time for different purposes as required by statute or best practice. Statutory obligations, legal processes and enquiries may also direct the retention of certain data. The Reflections Training Academies may store some data for predetermined periods as set out by contractual government requirements such as registers, photographs, exam results, achievements indefinitely in its archives

19 Data Loss Events (Personal Data Breaches)

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Reflections has in place Protective Measures, which are appropriate to protect against Data Loss Events.

In incidents of Data Loss leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data then an assessment as to whether this poses a risk to people. Consideration to the likelihood and severity of the risk to people's rights and freedoms, following the breach. When this assessment has been made, if it's likely there will be a risk then the ICO must be notified via 0303 123 1113 within 72 hours; Where a significant cyber incident occurs this may also need to be reported to the National Cyber Security Centre. Either of these scenarios would also need to be reported to the DfE contract Manager

Contacts and Representatives.

The DPC and DPO can be contacted in writing via the published main Academy address. The DPO can be contact via email at gdpr@reflectionstraining.co.uk

20 Data Protection by Design and Default (DPIAs)

DPIAs are conducted where high-risk processing occurs.

21 International Data Transfers

Data transfers outside the UK are only made with appropriate safeguards.