

GDPR and Privacy Policy

How we handle your information

CoreEd Limited

Version 2.0 | Review Date: 31/07/2027

1. About This Policy

This policy explains what personal information CoreEd Limited holds about you, why we hold it, what we do with it, how long we keep it, how we keep it secure, and what rights you have.

It is written for learners, applicants, employers, staff and anyone else whose information we hold. The internal rules our staff follow when handling personal data are set out in the General Data Protection Policy and Procedure (P-012). Data shared with employers, awarding organisations and support providers is covered by the Learner Data Sharing Agreement (P-019).

CoreEd Limited, company number 12213706, is the data controller for the personal information described in this policy.

2. The Law We Follow

- UK General Data Protection Regulation
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations 2003, which govern marketing by email and text

3. What We Collect and Why

What we hold	Why we hold it	Lawful basis
Name, date of birth, address, contact details, National Insurance number	To register you, verify eligibility and contact you about your programme	Contract, and legal obligation for funding returns
Programme and assessment records, including progress reviews, portfolio evidence, off the job hours and results	To deliver, assess and certificate your qualification	Contract, and legal obligation
Attendance and engagement records	To monitor progress and provide support	Contract
Learning support and disability information,	To put reasonable adjustments and support in place	Legal obligation under the Equality Act 2010, with explicit

What we hold	Why we hold it	Lawful basis
including any Education, Health and Care Plan		consent where required for special category data
Safeguarding, welfare and pastoral records	To protect learners from harm	Legal obligation, and the safeguarding condition in the Data Protection Act 2018
Employer and workplace details	To manage the apprenticeship and liaise with your employer	Contract
Funding and eligibility information	To claim and account for public funding	Legal obligation
Enquiry and marketing contact details	To respond to enquiries and, where you have agreed, to send you information about our courses	Legitimate interests for enquiries, consent for marketing

We do not use your personal information to make decisions about you by automated means alone, and we do not sell your information to anyone.

4. Who We Share It With

We share your information only where we have a lawful basis to do so. Depending on your programme, that may include:

- your employer, where you are an apprentice
- awarding organisations and End-Point Assessment Organisations, for registration, assessment and certification
- the Department for Education, for funding, the Individualised Learner Record and audit
- Ofsted, for inspection
- third-party support providers acting on our instructions under a data processing agreement
- the police, local authority children's or adult social care, or another statutory body, where there is a safeguarding or legal duty to do so

Full detail is set out in the Learner Data Sharing Agreement (P-019). We do not transfer personal data outside the United Kingdom without appropriate safeguards.

5. Marketing

We send marketing about our courses only where you have agreed to receive it, or where you are an existing business contact and the law permits it. Every marketing message includes a way to opt out.

Unsubscribing

You can stop receiving marketing from CoreEd at any time by emailing enquiries@CoreEd.co.uk. Withdrawing consent to marketing does not affect information we send you about a programme you are enrolled on, which we are required to send.

6. How Long We Keep It

We keep your information only for as long as we need it. As a general guide:

- learner programme and assessment records are retained for at least three years following the end of the funding year in which the activity is recorded, to meet audit requirements
- safeguarding records are retained in line with the Safeguarding Policy (P-013)
- records relating to a learner who was under 18 at enrolment are retained until they reach the age of 25
- enquiry and marketing records are retained until you unsubscribe or after a period of inactivity

Full retention periods are set out in the Document Retention and Secure Storage Policy (P-020).

7. How We Keep It Secure

- personal data is encrypted in transit and held on access-controlled systems
- access is granted on a need to know basis, and safeguarding records are restricted to named roles
- multi-factor authentication is applied to CoreEd systems
- staff receive data protection training at induction and annually
- audit trails are maintained for significant data sharing activity

If a data breach occurs that is likely to result in a risk to your rights and freedoms, we report it to the Information Commissioner's Office within 72 hours and tell you without undue delay where the risk to you is high.

8. Your Rights

Access	You can ask for a copy of the personal information we hold about you, and for details of how and why we use it.
Rectification	You can ask us to correct personal information that is inaccurate or incomplete.
Erase	You can ask us to delete information we hold about you where the law and our retention obligations no longer require us to keep it.
Restriction	You can ask us to stop processing your information temporarily while a challenge is resolved.
Objection	You can object to processing based on our legitimate interests, and you can object to direct marketing at any time.
Data portability	You can ask for a copy of the information you gave us, in a structured and commonly used format, so you can move or transfer it.
Withdraw consent	Where we rely on your consent, you can withdraw it at any time. This does not affect processing carried out before you withdrew it.
Automated decisions	You have the right not to be subject to a decision based solely on automated processing, including profiling, that has a legal or similarly significant effect on you.

We respond to a valid request within one calendar month. There is no charge, unless a request is manifestly unfounded or excessive.

9. Contact Us

To exercise a right, ask a question, or complain about how we have handled your information, contact us. We would like the chance to put things right.

Airam Neesa, Director and CEO

CoreEd Limited, The Media Centre, 7 Northumberland Street, Huddersfield HD1 1RL

Airam@CoreEd.co.uk | enquiries@CoreEd.co.uk | 0203 822 0001

You can also complain to the regulator

You have the right to complain to the Information Commissioner's Office about how we handle your personal information. You do not have to contact us first, although we would prefer the opportunity to resolve it.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

0303 123 1113 | www.ico.org.uk

10. Changes to This Policy

This policy is reviewed annually, or earlier where there is a change in the law or in how we handle personal information. The current version is published on the CoreEd website and is available to all staff via SharePoint.

11. Associated Documentation

- Complaints Procedure (P-004)
- General Data Protection Policy and Procedure (P-012)
- Safeguarding Policy (P-013)
- Learner Data Sharing Agreement (P-019)
- Document Retention and Secure Storage Policy (P-020)
- Online Safety and Remote Learning Policy (P-036)
- Learner Privacy Notice, issued at enrolment
- Data Breach Register and Record of Processing Activities

CoreEd Limited is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Policy owner: Director and CEO

Date of review: 31/07/2026 **Next review:** 31/07/2027