



Data Protection Policy

Policy Title	Data Protection Policy		
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Author	Venus Training Ltd	Approved By	Director / Governing Body
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Oversight Responsibility	Senior Management		
Related Documents	Safeguarding Policy, IT Policy		
Applicable Legislation	UK GDPR, Data Protection Act 2018		
Document Classification	Internal Policy Document		

1. Policy Statement

Venus Training Ltd is committed to protecting the privacy, confidentiality, integrity, and security of personal data relating to students, applicants, staff, contractors, visitors, placement providers, partner organisations, and all other stakeholders associated with the institution.

The institution recognises its responsibilities under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, Freedom of Information principles where applicable, and associated legal and regulatory requirements relating to the processing of personal information.

Venus Training Ltd is committed to ensuring that all personal data is processed lawfully, fairly, transparently, securely, and in accordance with recognised good practice within the Higher Education sector.

2. Purpose

The purpose of this policy is to:

- establish clear institutional responsibilities regarding data protection;



- ensure compliance with UK data protection legislation;
- protect the rights and freedoms of individuals whose data is processed;
- support secure and lawful handling of institutional information;
- ensure appropriate governance and accountability relating to personal data.

3. Scope

This policy applies to:

- all staff and management;
- students and applicants;
- consultants and contractors;
- temporary and agency staff;
- placement and partner organisations;
- external service providers handling institutional data.

The policy applies to all personal data processed by Venus Training Ltd in both electronic and paper-based formats.

4. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Special Category Data

Sensitive personal information including:

- health information;
- ethnicity;
- religion;
- biometric data;



- safeguarding-related information.

Processing

Any operation performed on personal data including:

- collection;
- recording;
- storage;
- sharing;
- amendment;
- deletion;
- destruction.

5. Data Protection Principles

Venus Training Ltd will ensure that personal data is:

a) Processed Lawfully, Fairly and Transparently

Personal information will only be processed where there is a lawful basis and individuals are appropriately informed.

b) Collected for Specified Purposes

Data will only be collected for legitimate educational, administrative, regulatory, safeguarding, employment, or operational purposes.

c) Adequate and Relevant

Only information necessary for institutional purposes will be collected and processed.

d) Accurate and Up to Date

Reasonable steps will be taken to ensure personal data remains accurate and current.



e) Retained Appropriately

Data will only be retained for as long as necessary in accordance with legal, regulatory, and operational requirements.

f) Processed Securely

Appropriate technical and organisational measures will be implemented to prevent:

- unauthorised access;
- misuse;
- accidental loss;
- destruction;
- disclosure.

6. Categories of Data Processed

Venus Training Ltd may process:

- student admissions data;
- enrolment records;
- attendance and engagement records;
- assessment and academic records;
- safeguarding and welfare information;
- disability and reasonable adjustment information;
- financial and payment records;
- staff employment records;
- recruitment and HR records;
- CCTV and security information;
- IT system usage information.



7. Lawful Basis for Processing

Personal data may be processed under the following lawful bases:

- contractual necessity;
- legal obligation;
- legitimate institutional interests;
- consent where appropriate;
- safeguarding and vital interests.

Special category data will only be processed where additional legal conditions are satisfied.

8. Data Security and Confidentiality

Venus Training Ltd will maintain appropriate security measures including:

- password-protected systems;
- controlled user access permissions;
- secure cloud-based systems;
- encrypted digital storage where appropriate;
- secure disposal of confidential records;
- restricted physical access to sensitive information.

Staff are expected to:

- maintain confidentiality at all times;
- use institutional systems responsibly;
- report suspected breaches immediately;
- complete relevant training where required.

9. Data Sharing

The institution may share information with:



- university partners;
- awarding organisations;
- regulatory authorities;
- Student Loans Company;
- government agencies;
- safeguarding authorities;
- external auditors and professional advisers;
- placement providers where necessary.

Any sharing of personal data will be carried out lawfully and only where appropriate safeguards are in place.

Venus Training Ltd will not sell personal information to third parties.

10. International Transfers

Where personal data is transferred outside the United Kingdom, Venus Training Ltd will ensure that appropriate legal safeguards and data protection measures are in place.

11. Individual Rights

Individuals have the right to:

- access their personal data;
- request correction of inaccurate information;
- request deletion of information where appropriate;
- restrict or object to processing;
- withdraw consent where consent is relied upon;
- lodge complaints regarding data handling.

Requests relating to personal data will be handled within statutory timescales.



12. Data Retention

Personal data will be retained in accordance with institutional retention schedules, legal obligations, university partnership requirements, and regulatory expectations.

When information is no longer required, it will be securely destroyed or permanently deleted.

13. Data Breaches

Any actual, suspected, or potential data breach must be reported immediately to senior management.

The institution will:

- investigate breaches promptly;
- assess risks and impact;
- implement corrective measures;
- notify relevant authorities where legally required;
- maintain records of incidents and actions taken.

14. Training and Awareness

Venus Training Ltd is committed to promoting awareness of data protection responsibilities.

Staff involved in handling personal data may receive:

- induction guidance;
- policy awareness;
- compliance training;
- safeguarding and confidentiality guidance.

15. Roles and Responsibilities

Senior Management

Responsible for institutional oversight, compliance monitoring, and implementation of this policy.



Staff

Responsible for handling information securely and complying with institutional procedures.

Students

Expected to use institutional systems responsibly and respect confidentiality requirements.

16. Monitoring and Review

This policy will be reviewed periodically to ensure continued compliance with:

- UK GDPR;
- Data Protection Act 2018;
- university partnership expectations;
- evolving regulatory requirements;
- operational developments within the institution.

17. Related Policies

This policy should be read alongside:

- Safeguarding and Prevent Policy;
- IT Acceptable Use Policy;
- Student Privacy Notice;
- Records Retention Procedures;
- Staff Confidentiality Requirements;
- Equality, Diversity and Inclusion Policy;
- Student Attendance and Engagement Policy.