



**ESTAR**

ELITE SKILLS, TRAINING  
& RECRUITMENT

**CP-005**

**Data Protection Policy  
and Privacy Notice**

**REV: 00**



# Data Protection Policy and Privacy Notice

Form: CP-005

Revision: 00

**Policy owner:** Data Protection Officer (DPO) / Head of Quality & Compliance

**Applies to:** All staff, learners, apprentices, employers, partners, subcontractors and visitors

**Provision:** Funded and non-funded delivery (including apprenticeships and adult skills)

**Review cycle:** Annual, or following changes to legislation or processing activity

**Version:** 00

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## PART A – DATA PROTECTION POLICY

### 1. Purpose

ESTAR Education is committed to protecting personal data and handling it lawfully, fairly and transparently. This policy sets out how ESTAR complies with UK data protection legislation and ensures that personal data is processed securely and responsibly.

This policy applies to all personal data processed by ESTAR, whether held electronically, on paper, or in other formats.

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### 2. Legal framework

ESTAR processes personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR), where applicable

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### 3. Definitions

- **Personal data:** Information relating to an identified or identifiable living individual.
- **Special category data:** Data requiring higher protection (e.g. health, safeguarding, ethnicity).
- **Processing:** Any operation performed on personal data (collection, storage, use, sharing, deletion).
- **Data subject:** The individual to whom the personal data relates.

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### 4. Data protection principles

ESTAR adheres to the seven data protection principles. Personal data shall be:

1. Processed lawfully, fairly and transparently
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and kept up to date



5. Kept no longer than necessary
  6. Processed securely
  7. Accountable (ESTAR can demonstrate compliance)
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## **5. Roles and responsibilities**

### **Data Protection Officer (DPO)**

- Oversees compliance with data protection legislation
- Acts as the point of contact for data subjects and the ICO
- Advises on data protection impact assessments (DPIAs)

### **All staff and associates**

- Handle personal data in accordance with this policy
- Complete mandatory data protection training
- Report data breaches immediately

### **Senior Leadership Team**

- Ensures appropriate resources and governance for data protection compliance
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## **6. Lawful bases for processing**

ESTAR processes personal data under one or more lawful bases, including:

- Legal obligation (e.g. ESFA funding, ILR reporting)
- Contract (e.g. learner or employment agreements)
- Public task (where applicable)
- Legitimate interests (balanced against individual rights)
- Consent (used sparingly and clearly recorded)

Special category data is processed under additional lawful conditions, such as:

- employment, social security and social protection law
  - safeguarding of children and individuals at risk
  - explicit consent where required
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## **7. Data collection and use**



ESTAR collects and processes data for purposes including:

- learner recruitment, enrolment and progression
- delivery of education, training and assessment
- safeguarding and learner support
- funding, audit and compliance reporting
- employer engagement (apprenticeships)
- staff employment and HR management

Data will not be used for incompatible purposes.

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## 8. Data sharing

Personal data may be shared with:

- funding bodies and regulators;
- awarding organisations and EPAOs;
- employers (apprenticeship context);
- subcontractors and partners under formal agreements;
- statutory agencies where legally required.

All data sharing is:

- lawful and proportionate;
  - subject to appropriate data sharing or processing agreements; and
  - recorded where required.
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## 9. Data security

ESTAR implements appropriate technical and organisational measures to protect personal data, including:

- access controls and role-based permissions;
  - password protection and multi-factor authentication where available;
  - encrypted devices and secure systems;
  - secure storage of paper records;
  - staff training and awareness.
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## **10. Data retention and disposal**

Personal data is retained only for as long as necessary and in line with:

- statutory and funding body requirements;
- business and audit needs.

Data is securely disposed of when no longer required (e.g. secure deletion, shredding).

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## **11. Data breaches**

All suspected or actual data breaches must be reported immediately to the DPO.

ESTAR will:

- investigate breaches promptly;
  - take steps to mitigate risk;
  - notify the Information Commissioner's Office (ICO) within 72 hours where required; and
  - inform affected individuals where there is a high risk to their rights and freedoms.
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## **12. Data subject rights**

Individuals have the right to:

- be informed about data processing;
- access their personal data;
- rectification of inaccurate data;
- erasure (where applicable);
- restrict or object to processing;
- data portability;
- withdraw consent (where consent is relied upon).

Requests are handled in line with statutory timescales.

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## **13. Monitoring and review**

Compliance with this policy is monitored through:

- internal audits and quality reviews;
- training completion monitoring;



- incident and breach reporting.

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## **PART B – PRIVACY NOTICE**

### **14. Who we are**

ESTAR Education is the data controller for the personal data it processes.

#### **Contact details:**

ESTAR Education

[Insert registered address]

Email: [Insert data protection email]

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### **15. What data we collect**

We may collect:

- personal details (name, address, contact details, date of birth);
- education and employment history;
- assessment and progress records;
- attendance and engagement data;
- health, SEND or safeguarding information (where required);
- employer details (apprenticeships);
- financial or funding-related data where required.

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### **16. How we use your data**

Your data is used to:

- deliver and manage education and training;
- assess learning and support progression;
- meet safeguarding obligations;
- comply with funding and regulatory requirements;
- communicate with you and relevant partners.

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### **17. Lawful basis**

We process your data because:



- it is necessary for a contract;
- we have a legal obligation;
- it is necessary for legitimate interests;
- you have provided consent (where applicable).

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### **18. Who we share your data with**

Your data may be shared with:

- funding bodies and regulators;
- awarding organisations and EPAOs;
- employers or placement providers;
- subcontractors delivering provision on our behalf;
- statutory authorities where required by law.

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### **19. How long we keep your data**

We retain data only for as long as necessary and in line with statutory, funding and audit requirements.

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### **20. Your rights**

You have the right to:

- access your data;
- request correction or deletion (where applicable);
- object to or restrict processing;
- make a complaint to the ICO.

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### **21. How to contact us or complain**

If you have concerns about how your data is handled, contact the DPO in the first instance.

If you remain dissatisfied, you may complain to the **Information Commissioner's Office (ICO)**.

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### **22. Changes to this notice**

This Privacy Notice may be updated periodically. The latest version will always be available on the ESTAR website.



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Date of last Review	Print Name	Position
02/02/2026	Keiran Casey	Chief Executive Officer
	Darren Beach	Quality Manager