

DATA PROTECTION & RETENTION POLICY

1. Purpose

MetaGedu Apprenticeships Ltd ("MetaGedu") is committed to protecting the privacy, confidentiality, integrity, and security of personal information. This policy establishes the principles, responsibilities, and procedures for the lawful collection, use, storage, sharing, retention, and disposal of personal data in compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Department for Education (DfE) Funding Rules
- Awarding Organisation requirements
- Information Commissioner's Office (ICO) guidance

The purpose of this policy is to ensure that all personal information is processed fairly, lawfully, transparently, and securely.

2. Scope

This policy applies to:

- Employees
- Apprentices and learners
- Employers
- Contractors and consultants
- Directors and volunteers
- Third-party service providers
- Any person handling information on behalf of MetaGedu

The policy applies to all information held by MetaGedu, including:

- Electronic records
- Cloud-based systems
- Emails
- Paper records
- Photographs
- Audio recordings
- Video recordings

3. Definitions

Personal Data

Any information relating to an identified or identifiable living individual.

Examples include:

- Name
- Address
- Email address
- Telephone number
- Date of birth
- National Insurance Number
- Learner Reference Number
- Employee Number
- Special Category Data

- Information requiring additional protection, including:
- Racial or ethnic origin
- Religious or philosophical beliefs
- Political opinions
- Trade union membership
- Genetic data
- Biometric data
- Health information
- Sexual orientation
- Criminal convictions and offences

Processing

Any operation performed on personal data including collection, recording, storage, organisation, retrieval, consultation, use, disclosure, deletion, or destruction.

4. Data Protection Principles

MetaGedu will comply with the UK GDPR principles.

Personal data must be:

- Processed lawfully, fairly, and transparently.
- Collected for specified, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Processed securely and protected against unauthorised access, loss, alteration, or disclosure.

MetaGedu will also comply with the Accountability Principle by maintaining evidence of compliance and implementing appropriate governance arrangements.

5. Lawful Basis for Processing

MetaGedu will only process personal data where a lawful basis exists.

Contract

Where processing is necessary to:

- Deliver apprenticeship programmes
- Deliver training and assessment services
- Manage employment relationships

Legal Obligation

Where processing is required to comply with:

- DfE Funding Rules
- Apprenticeship funding requirements
- Employment legislation
- Safeguarding legislation
- Health and Safety legislation
- Taxation and accounting requirements

Legitimate Interests

Where processing is necessary for the effective operation and improvement of MetaGedu's services and does not override the rights and freedoms of individuals.

Consent

Where explicit consent is required, including:

- Marketing communications
- Promotional photography
- Testimonials and case studies

Vital Interests

Where processing is necessary to protect life or safety.

Special Category Data will only be processed where an appropriate Article 9 condition applies.

6. Collection and Use of Personal Data

MetaGedu may collect and process personal information for:

- Apprenticeship delivery
- Learner support
- Assessment and certification
- Recruitment and employment
- Funding compliance
- Safeguarding
- Quality assurance
- Health and safety
- Regulatory reporting
- Customer relationship management
- Business administration

Only information necessary for legitimate organisational purposes will be collected and processed.

7. Data Sharing

Personal data may be shared where lawful and necessary with:

- Department for Education (DfE)
- Awarding Organisations
- End Point Assessment Organisations (EPAOs)
- Ofsted
- External Quality Assurers
- Employers supporting apprenticeships
- Auditors
- Professional advisers
- Regulatory bodies
- Software providers acting as Data Processors

MetaGedu will not sell personal data to third parties.

Appropriate contractual arrangements and Data Processing Agreements will be maintained where required.

8. International Data Transfers

Where personal data is transferred outside the United Kingdom, MetaGedu will ensure appropriate safeguards are implemented in accordance with UK GDPR.

These safeguards may include:

- UK Adequacy Regulations
- International Data Transfer Agreements (IDTAs)
- ICO-approved transfer mechanisms

9. Information Security

MetaGedu maintains appropriate technical and organisational measures to protect information.

These include:

- Role-based access controls
- Password management controls
- Multi-factor authentication where available
- Secure cloud storage
- Encryption of devices and data where appropriate
- Anti-malware protection
- Secure backups
- Secure disposal of records
- Physical security measures
- Staff training and awareness programmes

Access to personal information will be restricted to authorised individuals with a legitimate business need.

10. Learner Evidence and Confidential Information

Confidential workplace information obtained during apprenticeship delivery must not be included within learner portfolios unless authorised.

Where evidence contains confidential information, it must be:

- Redacted
- Anonymised
- Removed

Only authorised personnel may access learner evidence and assessment materials.

11. Data Protection Impact Assessments (DPIAs)

MetaGedu will undertake Data Protection Impact Assessments where:

- New systems process personal data.
- New technologies are introduced.
- Processing activities present a high risk to individuals.
- Significant changes are made to existing processing activities.

Where high risks cannot be mitigated, the ICO will be consulted before processing begins.

12. Individual Rights

Individuals have the right to:

- Be informed about how their data is used.
- Access their personal data.
- Request correction of inaccurate data.
- Request erasure of personal data where applicable.

- Restrict processing.
- Receive their data in a portable format where applicable.
- Object to processing.
- Challenge automated decision-making and profiling.

Requests relating to these rights should be submitted to the Interim Head of Operations & Compliance.

13. Subject Access Requests

Individuals may request access to their personal information.

MetaGedu will:

- Verify identity where appropriate.
- Respond within one calendar month.
- Provide information free of charge unless permitted otherwise under legislation.
- Maintain records of requests received.

Requests should be submitted to:

- Interim Head of Operations & Compliance
Email: enquiries@metagedu.io

14. Personal Data Breaches

All actual or suspected personal data breaches must be reported immediately to the Interim Head of Operations & Compliance.

MetaGedu will:

- Record all breaches in a Breach Register.
- Investigate incidents.
- Assess risks to affected individuals.
- Implement corrective actions.
- Notify the ICO within 72 hours where required.
- Notify affected individuals where legally required.

Failure to report a known breach may result in disciplinary action.

15. Data Retention

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected, comply with legal obligations, satisfy funding requirements, and support quality assurance activities.

Where multiple retention periods apply, the longer retention period will normally be adopted.

16. Retention Schedule

Assessment and Quality Assurance

Record Type	Retention Period
Learner Portfolios	Until External Quality Assurance following completion
Assessment Records	Current Year + 6 Years
Appeals Records	Current Year + 6 Years

Record Type	Retention Period
Assessment Board Minutes	Current Year + 3 Years
Internal Quality Assurance Records	7 Years from Certification
External Quality Assurance Reports	Current Year + 3 Years
Internally Marked Exams	3 Years

Teaching and Curriculum

Record Type	Retention Period
Lesson Plans	Current Version
Schemes of Work	Current Version
Course Handbooks	Current Version
Induction Materials	Current Version

Quality Assurance

Record Type	Retention Period
Programme Validation Records	Life of Programme + 4 Years
Internal Validation Records	Current Year + 1 Year
Quality Improvement Plans	Current Year + 3 Years
Learner Feedback	Current Year + 3 Years
Team Meeting Minutes	Current Year + 3 Years

Learner Records

Record Type	Retention Period
Individual Learning Plans	Completion + 4 Years
Progress Reviews	Completion + 4 Years
Disciplinary Records	Completion + 4 Years
Tutorial Records	Completion + 4 Years

Health and Safety

Record Type	Retention Period
COSHH Records	40 Years
Risk Assessments	40 Years
Accident Reports	40 Years
Hazardous Materials Records	40 Years Following Disposal

Financial Records

Record Type	Retention Period
Invoices	7 Years
Receipts	7 Years

Record Type	Retention Period
Petty Cash Records	7 Years
Apprentice Fee Records	7 Years

Funding and Regulatory Records

Record Type	Retention Period
ESFA Funding Evidence	10 Years from Funding Date
Qualification Decisions	7 Years from Certification
Personal Data	Minimum 7 Years or as Required by Law

17. Roles and Responsibilities

Directors

Directors are responsible for:

- Ensuring organisational compliance.
- Providing adequate resources.
- Monitoring policy effectiveness.

Interim Head of Operations & Compliance

Responsible for:

- Monitoring compliance with data protection legislation.
- Managing Subject Access Requests.
- Investigating data breaches.
- Maintaining records of processing activities.
- Conducting Data Protection Impact Assessments.
- Providing advice and training.
- Acting as the primary contact for data protection matters.

Staff

All staff must:

- Comply with this policy.
- Protect personal information.
- Access only information necessary for their role.
- Report breaches immediately.
- Complete mandatory training.

Learners and Other Users

Learners and users must:

- Provide accurate information.
- Notify MetaGedu of changes.
- Report inaccuracies where identified.

18. Complaints

Individuals who are dissatisfied with how MetaGedu has handled their personal information should contact:

Interim Head of Operations & Compliance

Email: enquiries@metagedu.io

If the matter cannot be resolved internally, individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
Website: [Information Commissioner's Office \(ICO\)](https://ico.org.uk/)
ICO Registration Number: ZA072963

19. Monitoring and Review

This policy will be reviewed annually or sooner where:

- Legislation changes.
- Funding requirements change.
- Significant organisational changes occur.
- Regulatory guidance changes.

20. Publication

This policy is available to:

- Staff
- Learners
- Employers
- Awarding Organisations
- Regulatory Bodies
- Other stakeholders upon request

21. Document Control

Policy Owner: Interim Head of Operations & Compliance
ICO Registration Number: ZA072963
Contact Email: enquiries@metagedu.io
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