



DATA PROTECTION AND RECORDS RETENTION POLICY

Policy reference UKV-QA-29 | Version 3.0

UK Versity Online Limited | BAC Accredited College | UKPRN 10052768

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Version	3.0
Status	Consolidated
Effective date	1 October 2026
Next review	September 2027
Policy owner	Data Protection Lead
Author	Director of Education
Approved by	Principal (Ramanjeet Singh), on behalf of the Academic Board
Approval date	1 October 2026

Data Protection and Records Retention Policy

UK Versity Online Limited | ATHE 889 | Pearson 07737 | OTHM DC1506132 | Ascentis 3286 | NCFE 8465520 | IFA Direct 283334

Document control

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Version	3.0
Status	Consolidated
Effective date	1 October 2026
Next review	September 2027 (annual), or earlier if required
Owner	Data Protection Lead
Author	Director of Education
Approval authority	Academic Board, chaired by the Principal (Ramanjeet Singh)
Approval date	1 October 2026
Applies to	All personal data processed by UK Versity about learners, applicants, parents and guardians, staff, tutors, contractors and other individuals
Supersedes	Data Protection Policy (GDPR) QA-14 (August 2014, next review November 2027); Policy on the Retention of Student Data and Records (undated)
Summary	Explains how UK Versity collects, uses, shares, protects and deletes personal data, how people can exercise their rights and complain, and how long each type of record is kept.

Compliance mapping

BAC College Scheme 2023 standards	2.7; 26.2; 26.3; 26.4
UK Quality Code 2024 (voluntary)	Principle 4
OfS conditions (benchmark only; not OfS registered)	E (benchmark)
Awarding organisations	ATHE; Pearson; OTHM; Ascentis; NCFE; IFA Direct
Legislation and regulation	UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025; Privacy and Electronic Communications Regulations 2003; Limitation Act 1980; Equality Act 2010

Version history

Version	Date	Change
1.0	August 2014	First issue (Data Protection Policy QA-14)
3.0	October 2026	Full rebuild: UK GDPR and Data (Use and Access) Act 2025, data protection complaints procedure, processors and international transfers for online delivery, retention schedule consolidated, BAC mapping and version control

1. Purpose

UK Versity Online Limited (trading as UK Versity) is the data controller for the personal data it processes to run an online college. It is registered with the Information Commissioner's Office (ICO). This policy explains how UK Versity complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. It sets out what data is collected and why, who it is shared with, how it is protected, how people can use their rights or complain, and how long records are kept. It meets BAC standard 2.7 (data protection and security policies).

2. Scope

This policy covers all personal data held by UK Versity in any format: Moodle (lms.ukversity.co.uk), Zoho systems, email, Zoom recordings, WhatsApp groups run by UK Versity, spreadsheets, paper records at UK Versity House, and data held by processors on UK Versity's behalf. It applies to all staff, tutors, assessors, Internal Quality Assurers (IQAs), contractors and agents who handle personal data for UK Versity, wherever they work, including outside the UK.

3. Definitions

- **Personal data:** any information relating to an identified or identifiable living person.
- **Special category data:** data about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation.
- **Criminal offence data:** data about criminal convictions and offences, including DBS check results.
- **Processor:** an organisation that processes personal data on UK Versity's instructions.
- **Personal data breach:** a breach of security leading to the accidental or unlawful loss, destruction, alteration, disclosure of, or access to, personal data.

4. Principles

UK Versity makes sure personal data is:

1. processed lawfully, fairly and transparently;
2. collected for specified, explicit and legitimate purposes, and not used in ways incompatible with them;
3. adequate, relevant and limited to what is needed;
4. accurate and kept up to date;
5. kept no longer than necessary (section 13);
6. kept secure.

UK Versity is accountable for showing that it meets these principles. It keeps a record of processing activities, privacy notices, processor agreements, data protection impact assessments (DPIAs) and a breach log. UK Versity does not sell personal data.

5. What data UK Versity processes and why

Purpose	Examples of data	Lawful basis
Enrolment, teaching, assessment, registration and certification	Name, date of birth, contact details, photographic ID, Unique Learner Number where applicable, prior qualifications, submissions, feedback, results	Contract with the learner

Purpose	Examples of data	Lawful basis
Awarding organisation registration, quality assurance and certification	Learner details, assessed work, IQA records, plagiarism and AI screening reports	Contract, and legitimate interests in meeting awarding organisation requirements
Verifying identity and authenticity	Photographic ID, Moodle logs, authenticity declarations	Legitimate interests; contract
Fees and payments	Payment records, instalment plans	Contract; legal obligation (tax and accounting)
Safeguarding and welfare	Concerns, referrals, support records	Legal obligation or vital interests; special category data under the safeguarding condition in the Data Protection Act 2018
Reasonable adjustments, special consideration and Learning Support Plans (UKV-QA-32)	Health and disability information, medical evidence, learning support needs	Explicit consent or substantial public interest condition
Equality monitoring	Ethnicity, disability, sex, age	Legitimate interests; equality of opportunity condition in the Data Protection Act 2018
Staff recruitment and employment	CV, references, qualifications, right to work, DBS results, payroll	Contract; legal obligation; criminal offence data under the relevant Data Protection Act 2018 condition
Marketing	Name, email, course interest	Consent (Privacy and Electronic Communications Regulations 2003) or, for existing learners, the soft opt-in with an easy opt-out
Testimonials and photographs	Quotes, images	Consent

Privacy notices on www.ukversity.co.uk and in the enrolment process explain this in plain language. UK Versity collects only the data it needs. Learners aged 16 and 17 are given privacy information they can understand and can usually exercise their own rights.

6. Sharing personal data

UK Versity shares personal data only where there is a lawful basis and only the minimum needed:

- **Awarding organisations** (ATHE, Pearson, OTHM Qualifications, Ascentis, NCFE and IFA Direct through ATHE, named in full in UKV-QA-07) for registration, external quality assurance, certification and malpractice investigations.
- **British Accreditation Council (BAC)** for inspections, usually as samples of records.
- **Employers or sponsors** who fund a learner, limited to what the learner agreed at enrolment.
- **Agents** who refer applicants, limited to the application and under a written agreement (UKV-QA-02).
- **Universities** where a learner asks for help with progression and agrees to the referral.
- **Local authorities, police and other agencies** where needed for safeguarding, to prevent or detect crime, or where the law requires it (UKV-QA-25).
- **Professional advisers and regulators** where needed for legal, audit or regulatory purposes.

Staff must not disclose learner information to family members, friends or employers without the learner's consent, unless an exception above applies. Requests from the police or other authorities are passed to the Data Protection Lead.

7. Processors

UK Versity uses processors to deliver its online service. Each processor has a written data processing agreement that meets UK GDPR requirements, and the Data Protection Lead checks its security before use. Current processors include:

Processor	Purpose
Moodle hosting provider	Hosting the virtual learning environment and learner submissions
Zoho	CRM, email and file storage
Zoom	Live online sessions and recordings
GPTZero	AI and plagiarism screening of submitted work
Payment providers (including PayPal and Klarna)	Online payments and instalment plans

A DPIA is completed before UK Versity adopts any new system that processes learner data at scale, uses new technology such as AI tools, or processes special category data. No decision with legal or similarly significant effect on a learner is made solely by automated means. For example, an AI screening score is never on its own the basis for a malpractice finding (UKV-QA-19).

8. International transfers

Learners and some tutors live outside the UK, and some processors store data outside the UK. UK Versity transfers personal data outside the UK only where:

- the destination is covered by UK adequacy regulations (for example the EEA); or
- the transfer is protected by the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, or, for US organisations, certification under the UK Extension to the EU-US Data Privacy Framework; or
- another exception in UK GDPR applies.

Tutors and contractors outside the UK access learner data only through UK Versity systems and must not download it to personal devices. Their agreements include data protection terms.

9. Your rights

You have the right to:

1. be informed about how your data is used;
2. access your data (a subject access request);
3. have inaccurate data corrected;
4. have data erased in certain circumstances;
5. restrict processing in certain circumstances;
6. object to processing based on legitimate interests, and to stop direct marketing at any time;
7. data portability, where processing is based on consent or contract and carried out by automated means;
8. not be subject to solely automated decisions with significant effects;

9. withdraw consent at any time, where consent is the basis.

Make a request by email to admin@ukversity.co.uk, marked for the Data Protection Lead, or in writing to UK Versity House, 11 Woodcock Court, Waters Edge Business Park, Modwen Road, Salford M5 3EZ. Any member of staff who receives a request passes it to the Data Protection Lead the same working day.

UK Versity will verify your identity, then respond within one calendar month. This can be extended by up to two further months for complex or numerous requests; you will be told within the first month. There is normally no fee. Some information may be withheld where the law allows, for example to protect another person's data or confidential references.

10. Data protection complaints

From 19 June 2026, UK Versity must have a process for complaints about how it handles personal data. If you are unhappy about how UK Versity has used your data or responded to a request:

1. Send your complaint to the Data Protection Lead by email to admin@ukversity.co.uk or in writing to UK Versity House.
2. UK Versity will acknowledge your complaint within 30 days.
3. UK Versity will investigate, keep you informed, and respond without undue delay, telling you the outcome and any action taken.
4. If you remain unhappy, you can complain to the Information Commissioner's Office (ico.org.uk). The ICO normally expects you to complain to UK Versity first.

Data protection complaints are handled under this policy, not under UKV-QA-24 Complaints Policy and Procedure, although the Data Protection Lead may ask the Quality Manager to investigate.

11. Security

1. Access to personal data is limited to staff who need it for their role, with role-based permissions on Moodle and Zoho.
2. Multi-factor authentication is used on UK Versity email, Zoho and administrator accounts. Passwords are never shared (UKV-QA-30).
3. Learner data stays on UK Versity systems. It must not be stored on personal devices, personal email or personal cloud accounts, or pasted into public AI tools.
4. Live session links are shared only on Moodle or by UK Versity email. Session recordings are stored only on UK Versity systems.
5. Learners joining UK Versity WhatsApp groups are told that their phone number will be visible to other group members. Joining is optional, and all essential information is also given on Moodle.
6. Paper records at UK Versity House are kept to a minimum, stored in locked cabinets and shredded as confidential waste when no longer needed. Screens are locked when unattended.
7. UK Versity does not use CCTV as part of its online delivery. If CCTV is introduced at UK Versity House, a DPIA, signage and a separate procedure will be put in place first.

12. Personal data breaches

1. Anyone who discovers or suspects a breach (for example an email sent to the wrong person, a lost device or a hacked account) reports it to the Data Protection Lead immediately, and no later than the same working day.

2. The Data Protection Lead contains the breach, assesses the risk to individuals and records it in the breach log.
3. If the breach is likely to result in a risk to people's rights and freedoms, the Data Protection Lead reports it to the ICO without undue delay and within 72 hours of UK Versity becoming aware of it.
4. If the breach is likely to result in a high risk, the people affected are told without undue delay, with advice on protecting themselves.
5. Where the breach affects assessment or certification data, the Quality Manager tells the relevant awarding organisation.
6. Lessons learned are recorded and actions agreed.

13. Records retention schedule

Records are kept for the periods below, then securely deleted or destroyed. Where an awarding organisation, BAC or the law requires a longer period, the longer period applies. Records needed for an open complaint, appeal, investigation or legal claim are kept until it is closed.

Record	Minimum retention	Basis
Assessment records, learner work, feedback, IQA records, plagiarism and AI screening reports	3 years after certification	Awarding organisation requirements, including Pearson
Reasonable adjustment and special consideration records, and Learning Support Plans	4 years after results are issued	ATHE requirement; UKV-QA-18; UKV-QA-32
Superseded policy versions and governance records	6 years	UKV-QA-01
Register of Interests and declarations	Engagement plus 3 years	UKV-QA-21
Registration and certification records	3 years after certification	Awarding organisation requirements
Enrolment records, photographic ID verification	3 years after certification or withdrawal	Identity verification (BAC 26.3) and awarding organisation audit
Complaints and appeals	3 years after the case closes	UK Versity policy (UKV-QA-23, UKV-QA-24)
Data protection requests and complaints	3 years after the case closes	UK Versity policy
Malpractice and maladministration investigations	5 years after the case closes	UK Versity policy (UKV-QA-20)
Learner contract, Learner Agreement, fees and payment records	6 years after the end of the contract	Limitation Act 1980
Safeguarding records	As set out in UKV-QA-25 section 14	UKV-QA-25; Keeping Children Safe in Education 2026
Harassment and discrimination reports	3 years after the case closes	UKV-QA-26
Whistleblowing records	6 years after the case closes	UKV-QA-28

Record	Minimum retention	Basis
Live session recordings	While needed by learners on the programme; reviewed annually by the Course Coordinator	UK Versity policy
Staff personnel files, including staffing files for tutors, assessors and IQAs	6 years after the person leaves	Limitation Act 1980
Right to work check records	2 years after employment ends	Home Office requirements
DBS checks	Certificate not kept; date, certificate number, level and decision kept on the staff file	DBS Code of Practice
Payroll and financial records	6 years from the end of the financial year	HMRC requirements
Unsuccessful job applicants	6 months after the recruitment decision	UK Versity policy
Accident book and RIDDOR records	3 years from the date of the entry	UKV-QA-31
Personal data breach log	3 years after the breach	UK Versity policy
Marketing contact data	Until consent is withdrawn or the person asks to stop; a suppression record is kept so they are not contacted again	Privacy and Electronic Communications Regulations 2003

14. Secure disposal

1. Electronic records are permanently deleted from UK Versity systems, including shared folders and email, at the end of the retention period.
2. Paper records are shredded or disposed of as confidential waste through a contractor with a written agreement.
3. Devices are securely wiped or physically destroyed before disposal.
4. Processors are instructed to delete or return data at the end of their contract.
5. The Registrar and Quality Manager run an annual retention review each September and record what was destroyed in a disposal log.

15. Roles and responsibilities

Role	Responsibility
Data Protection Lead (Principal and Director of Education, Ramanjeet Singh)	Owns this policy; handles rights requests and data protection complaints; manages breaches and ICO reporting; approves processors and DPIAs; keeps the ICO registration current
Quality Manager	Applies retention to assessment, IQA, complaints, appeals and malpractice records; notifies awarding organisations of breaches affecting their data
Registrar	Keeps learner registration and certification records accurate; runs the annual retention review with the Quality Manager
Course Coordinator	Manages Moodle permissions and session recordings
Centre Coordinator	Manages system accounts, multi-factor authentication and acceptable use (UKV-QA-30)

Role	Responsibility
Financial Controller	Keeps fees and payment records for the required period
All staff, tutors and contractors	Handle data securely; report breaches and requests the same working day; complete data protection training at induction and annually
Learners	Keep their details up to date; protect their Moodle login

16. Related policies and legislation

- UKV-QA-02 Public Information, Marketing and Agents Policy
- UKV-QA-07 Registration and Certification Policy
- UKV-QA-19 Academic Integrity, Plagiarism and Use of AI Policy
- UKV-QA-20 Malpractice and Maladministration Policy and Procedure
- UKV-QA-23 Appeals Policy and Procedure
- UKV-QA-24 Complaints Policy and Procedure
- UKV-QA-25 Safeguarding and Prevent Policy
- UKV-QA-27 Staff Recruitment, Induction and Development Policy
- UKV-QA-30 Acceptable Use, E-Safety, Email and Social Media Policy
- UKV-QA-31 Health, Safety and Wellbeing Policy
- UK GDPR and Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations 2003
- Limitation Act 1980
- Equality Act 2010
- BAC College Scheme 2023, standards 2.7 and 26.2 to 26.4

17. Monitoring and review

The Data Protection Lead keeps the record of processing activities, processor list, DPIAs, rights request log, data protection complaints log and breach log. The Data Protection Lead reports to the Academic Board at least annually on requests, complaints, breaches, training completion and the outcome of the annual retention review.

This policy is reviewed at least annually, and earlier if data protection law or ICO guidance changes, an awarding organisation or BAC requirement changes, an inspection or EQA action requires it, or a significant breach occurs. Each version is recorded in the Policy Register (UKV-QA-REG v3.0). Records created under this policy are retained as set out in section 13.

Approval and review

Stage	Name and role	Date
Prepared by	Director of Education	30 September 2026
Checked by (policy owner)	Data Protection Lead	30 September 2026
Approved by	Ramanjeet Singh, Principal and Director of Education, on behalf of the Academic Board	1 October 2026

Stage	Name and role	Date
Next review due	Quality Manager (Shazia Khan) to schedule through the Policy Register UKV-QA-REG	September 2027