



Data Protection policy

Policy Statement

At YMCA Awards, we are committed to protecting the personal data of learners, centres, staff, contractors, and other individuals whose information we process. We recognise the importance of handling personal data lawfully, fairly, and transparently, and of maintaining appropriate safeguards to protect personal data from unauthorised or unlawful processing, accidental loss, destruction, or damage.

This policy sets out our commitment to complying with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It explains the principles that govern how we collect, use, store, share, and protect personal data in the course of our activities as an awarding organisation.

We act as a data controller in respect of the personal data we process for the purposes of qualification development, assessment, quality assurance, certification, regulatory compliance, and associated operational activities. Responsibility for complying with this policy and with data protection legislation applies to all employees, associates, contractors, and other parties who process personal data on our behalf.

Scope

This policy applies to all personal data that we process in the course of our activities as an awarding organisation. This includes personal data relating to learners, centre staff, employees, associates, contractors, external quality assurers, and other individuals whose information we process.

The policy applies to all personal data processed by us in connection with qualification development, assessment, quality assurance, certification, regulatory compliance, and related operational activities.

It applies regardless of the format in which personal data is held, including electronic systems, paper records, audio, visual, or other recorded formats, and includes personal data processed on our behalf by third parties such as approved centres, service providers, and contractors.

Related legislation and guidance

We process personal data in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are responsible for ensuring that our processing of personal data complies with the requirements of this legislation and with guidance issued by the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

As an awarding organisation, we also operate within a regulated qualifications environment. While data protection is not regulated by qualifications regulators, we recognise that compliance with data protection legislation supports our wider regulatory responsibilities, including learner protection, assessment integrity, and the secure handling of assessment and certification records.

Responsibilities

We are responsible for ensuring that personal data is processed in accordance with applicable data protection legislation and this policy.

Accountability for data protection compliance sits with YMCA Awards' senior leadership, who provide oversight and ensure that appropriate governance arrangements are in place.

We maintain appropriate records of our personal data processing activities in accordance with data protection legislation, as part of our overall governance and accountability arrangements.

All employees, associates, contractors, and other individuals who process personal data on our behalf are responsible for complying with this policy and for handling personal data lawfully, securely, and only as necessary for their role.

Where required by law, we will appoint a Data Protection Officer. Where a Data Protection Officer is not required, data protection compliance is overseen through our existing governance and management arrangements.

Fair and lawful processing

YMCA Awards is committed to processing personal data fairly, lawfully and transparently, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We ensure that personal data is:

- processed for specified, explicit, and legitimate purposes
- adequate, relevant, and limited to what is necessary for those purposes
- accurate and, where necessary, kept up to date
- retained only for as long as necessary
- protected by appropriate technical and organisational measures to ensure its security.

We only process personal data where we have a clear and appropriate lawful basis under data protection legislation. The lawful basis relied upon depends on the nature and purpose of the processing and is communicated to individuals through appropriate privacy information.

Personal data is collected and used only for purposes that are relevant to our role as an awarding organisation. We do not process personal data in ways that are incompatible with those purposes, unless permitted by law.

YMCA Awards does not sell or trade personal data and only shares personal data where there is a clear lawful basis, for defined purposes, and in accordance with our published [Privacy and Cookies Policy](#).

All personal data is treated as confidential and access to personal data is restricted to authorised individuals or third parties who require access for legitimate operational, regulatory, or contractual purposes and who are subject to appropriate safeguards.

Where we process special category personal data or criminal offence data, we do so only where permitted by law and with appropriate conditions and safeguards in place.

We provide clear and accessible information to individuals about how their personal data is used, shared, and protected, including information about their rights under data protection legislation. Further detail about specific processing activities and data sharing arrangements is set out in our [Privacy and Cookies Policy](#).

Data subject rights

Individuals whose personal data we process have rights under data protection legislation in relation to how their personal data is used.

These rights may include the right to:

- be informed about how their personal data is processed
- access personal data we hold about them
- request the rectification of inaccurate or incomplete personal data
- request the erasure of personal data, where permitted by law
- restrict or object to the processing of personal data in certain circumstances
- request the transfer of personal data, where applicable
- not be subject to decisions based solely on automated processing, where applicable.

We respect and uphold the rights of data subjects and will respond to requests to exercise those rights in accordance with data protection legislation.

Where personal data is processed jointly with, or shared between, other independent data controllers (including approved centres), we work cooperatively to ensure that data subject rights can be exercised effectively and lawfully.

We provide clear information to individuals about their rights and how to exercise them through our published [Privacy and Cookies Policy](#).

Individuals also have the right to raise concerns about how their personal data is processed and to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

Records, accountability and impact assessments

We maintain appropriate records and documentation to demonstrate compliance with data protection legislation and to support accountability for how personal data is processed.

This includes maintaining records of our personal data processing activities in accordance with Article 30 of the UK GDPR, covering the types of personal data we process, the purposes for which it is used, and the categories of individuals and organisations involved.

Where required by law, or where processing is likely to result in a high risk to the rights and freedoms of individuals, we carry out Data Protection Impact Assessments (DPIAs). DPIAs are used to identify and assess data protection risks and to determine appropriate measures to mitigate those risks before processing takes place.

Records of processing activities, DPIAs, and other data protection documentation are kept under review and are used to support governance, assurance, and continuous improvement in how personal data is managed.

Further detail about specific processing activities and associated safeguards is provided through relevant privacy information, contractual arrangements, and supporting [policies and procedures](#).

Data retention

We retain personal data only for as long as it is necessary for the purposes for which it is processed, in accordance with the storage limitation principle set out in data protection legislation.

Retention periods for different categories of personal data are defined and managed through our [Data Retention Policy](#), which takes account of legal, regulatory, contractual, and operational requirements.

Personal data is securely deleted, anonymised, or otherwise disposed of when it is no longer required in accordance with that policy.

Data breaches and incidents

We take data protection incidents seriously and have arrangements in place to identify, manage, and respond to personal data breaches in accordance with data protection legislation.

A personal data breach may include the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Where a personal data breach occurs, we assess the nature and impact of the incident, including the risk to the rights and freedoms of individuals. Where required by law, we notify the Information Commissioner's Office (ICO) and affected individuals.

All employees, associates, contractors, and other individuals who process personal data on our behalf are expected to report actual or suspected data protection incidents promptly through our internal reporting arrangements.

Personal data breaches and incidents are recorded, reviewed, and used to support learning and continuous improvement in how personal data is protected.

Complaints and concerns

Individuals who have concerns about how their personal data is processed by YMCA Awards are encouraged to raise those concerns with us in the first instance.

Approved centres may raise data protection concerns with us either by using the relevant Contact YMCA Awards form available through Y-Connect, or by contacting us at awards.support@ymca.co.uk.

Other individuals, including learners and members of the public, may raise initial data protection concerns by contacting us at awards.support@ymca.co.uk.

We take data protection complaints and concerns seriously and will consider them fairly and in accordance with applicable data protection legislation and our internal arrangements.

Where concerns relate to the processing of personal data by approved centres or other independent data controllers, we work cooperatively with those organisations, where appropriate, to support the effective and lawful handling of the concern.

Individuals also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection, if they are dissatisfied with how their personal data has been processed or how a concern has been handled.

Review and monitoring

This Data Protection Policy is kept under review to ensure it remains aligned with data protection legislation, guidance issued by the Information Commissioner's Office (ICO), and YMCA Awards' data processing activities.

Compliance with this policy is monitored through our governance and assurance arrangements, including oversight of records of processing activities, data protection impact assessments, reported incidents, and complaints or concerns relating to personal data.

The policy will be reviewed and updated where there are material changes to legal requirements, regulatory guidance, organisational structure, or the nature of the personal data we process.