

DPTrainingUK Policy Document:

- **Privacy & Data Protection Policy**
- Policy Number: **DPTrainingUK-P7-PDP-V5**
- Policy Date: **15/05/2026**
- Review Date: **05/2027**

What This Policy is About: What personal data we collect, why we collect it, how we store it, and your rights in relation to your data.

Who it Applies to: All course delegates, website visitors, and DPTrainingUK staff.

Key Message: We collect only what is necessary, store it securely, and retain it for no longer than 5 years. You have the right to see, correct, or request deletion of your data at any time.

If you have Any Questions: Contact us at info@DPTrainingUK.com or via www.DPTrainingUK.com. For urgent enquiries, call +44 (0)7921 769868



1. Scope

- 1.1. This Privacy & Data Protection Policy outlines Delegate/ Client Privacy Rights and the Data Collection & Record Retention procedures for all training programmes and business activities overseen by **Different Perspective Training Ltd. (DPTrainingUK)** specifically regarding:
 - 1.1.1. **Activities:** The delivery of Training and Consultation in First Aid, Mental Health, Outdoor and Off-Site Safety, and Water Safety.
 - 1.1.2. **People:** All DPTrainingUK trainers, course delegates, and any members of the public or site staff who interact with the training group or equipment.
 - 1.1.3. **Locations:** All training sites, including bespoke client premises and public venues.

2. Introduction

- 2.1. The goal of this policy is to bring together all legal data protection aspects in one clear document, covering data collection, retention, and the use of personal data for both course delegates and website visitors. This policy can also be used as the basis for statutory data protection inspections. This ensures compliance with the UK GDPR, the Data Protection Act 2018, and the Data (Use & Access) Act 2025, and provides a clear record of that compliance.
- 2.2. The UK General Data Protection Regulation (GDPR) is a regulation, which requires any business that processes data belonging to UK citizens to protect it and not misuse it. As a responsible business, we are committed to robustly implementing the requirements of UK GDPR.
- 2.3. We are committed to the rules of data protection and to upholding the seven data protection principles. These are the principles that must be satisfied when obtaining, handling, processing, moving and the storing personal data.
- 2.4. We collect and process information from course delegates and website visitors as required for qualification delivery, business administration, and as required by our Awarding Organisations and their regulators. We are therefore considered the Data Controller; our course delegates, website visitors, and employees are the Data Subjects.
- 2.5. The Awarding Organisations that DPTrainingUK collects and processes data for are:
 - 2.5.1. ITC First, The White House, 4 Church Square, Hartlepool, TS24 7EQ.
 - 2.5.2. First Aid Awards, through NUCO Training Ltd, Barton House, Central Treviscoe, St Austell, Cornwall PL26 7QP.
 - 2.5.3. The Royal Life Saving Society UK, Redhill House, 227 London Rd, Worcester WR5 2JG.
 - 2.5.4. The Royal Geographical Society, 1 Kensington Gore, South Kensington, London SW7 2AR.
 - 2.5.5. Atlantic Crest, 28 Canon St, Barry CF62 7RH.
- 2.6. We retain sufficient assessment and quality assurance records to allow for the review of assessment over time.

3. 7 Data Protection Principles

- 3.1. Under UK GDPR (Article 5), all personal data must be processed in accordance with the following seven principles:
 - 3.1.1. **Lawfulness/ Fairness/ Transparency** - Data must be obtained and processed fairly, lawfully and with transparency.
 - 3.1.2. **Purpose Limitation** - Data must be obtained for a specified, explicit and lawful purpose.
 - 3.1.3. **Data Minimisation** - Data must be adequate, relevant and not excessive for its collection purpose.
 - 3.1.4. **Accuracy** - Data must be accurate and kept up to date.
 - 3.1.5. **Storage Limitation** - Data must not be kept for longer than is necessary for its purpose.

- 3.1.6. Integrity/ Confidentiality - Data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.
- 3.1.7. Accountability - The Data Controller is responsible for, and must be able to demonstrate compliance with, all of the above principles.

4. Data Subjects Rights

4.1. Under the UK GDPR individuals have rights associated with their data, described below:

- 4.1.1. The right to be informed
- 4.1.2. The right of access
- 4.1.3. The right to rectification
- 4.1.4. The right to erasure
- 4.1.5. The right to restrict processing
- 4.1.6. The right to data portability
- 4.1.7. The right to object
- 4.1.8. Rights in relation to automated decision making and profiling

5. Children's Personal Data

5.1. For the benefit of this policy a child is classed as a young person under the age of 16. Children must have parental (or an individual in loco-parentis) consent for DPTrainingUK and its Awarding Bodies to collect and process their data. All parties involved in the collection, processing and storage of Data, (Data Processors and Data Controllers: DPTrainingUK and its Awarding Organisations) will maintain evidence of consent using the registration process.

6. Data Collection

- 6.1. We collect and process personal data from course delegates, website visitors, and staff as required for qualification delivery and business administration, in accordance with the latest guidance from the Information Commissioner's Office (ICO). We act on behalf of our Awarding Organisations, gathering and submitting delegate data securely and in accordance with this policy.
- 6.2. DPTrainingUK has signed committal documents agreeing to the terms set by its Awarding Organisations, allowing it to deliver their qualifications, use the relevant assessment and quality assurance materials, and provide that Awarding Organisation and their regulators access to relevant data when requested.
- 6.3. Where information needs to be shared between organisations, delegates must consent to their data being disclosed to legitimate agencies in accordance with UK GDPR.
- 6.4. The personal data we collect from delegates via registration documents includes:
 - 6.4.1. Prefix.
 - 6.4.2. First Name.
 - 6.4.3. Family (Surname) Name.
 - 6.4.4. Date of Birth.
 - 6.4.5. Gender: male, female, other, prefer not to disclose.
 - 6.4.6. Nationality: English, Welsh, Scottish, Northern Irish, British, Other.
 - 6.4.7. Ethnicity: based upon 2021 census question definitions.
 - 6.4.8. Postal Address & Postcode.
 - 6.4.9. Email Address.
 - 6.4.10. Telephone & Mobile.
 - 6.4.11. Special Needs & Reasonable Adjustment Request.
 - 6.4.12. Undertaking Signature (confirming engagement in the qualification and consent to the use of collected data for registration and future communication).
- 6.5. Each delegate is also asked to complete an end of course Evaluation & Feedback Form. Responses are submitted to the Awarding Organisation, enabling analysis of our training courses. Delegates may add additional comments — each is reviewed by the DPTrainingUK Manager, and any areas of concern are investigated. Questions cover:
 - 6.5.1. The assessment component of the qualification.
 - 6.5.2. The teaching component of the qualification.
 - 6.5.3. Course materials.
 - 6.5.4. Special adjustment requirements.

7. Data Processing

- 7.1. When delegate data is submitted to us and forwarded to our Awarding Organisations, it may be processed for any or all of the following purposes:
 - 7.1.1. Attribute qualification credit to learners.
 - 7.1.2. Produce commemorative and CPD certificates.

- 7.1.3. Enable DPTrainingUK and its Awarding Organisations to contact the individual regarding their qualification
- 7.1.4. Monitor Awarding Organisation qualifications to ensure equality and inclusivity.
- 7.1.5. Monitor compliance with equalities legislation to ensure there is no discrimination in our courses, administration, marketing, or delegate recruitment.
- 7.2. Delegate data will only be used for the legitimate purposes described above. Any changes to the ways in which data is used will be communicated to those individuals affected. For all externally regulated and certificated qualifications, all assessment evidence is reviewed and evaluated by the relevant Awarding Organisation.
- 7.3. It is the policy of both DPTrainingUK and its Awarding Organisations that all information and data be shared with regulatory authorities upon request. Learner Registration and Evaluation documents are continually developed to enhance both learner consultation and data collection.

8. Data Storage, Retention & Destruction

- 8.1. We ensure all data is held securely, on password-protected and encrypted devices with appropriate virus and data protection software, and in locked physical storage. Course registration forms are removed from sight and access of other delegates immediately after completion. Login credentials are never shared with unauthorised individuals or companies. Data is not disclosed or shared verbally or in writing to any unauthorised party.
- 8.2. We upload delegate data to Awarding Organisation systems promptly and securely, in accordance with each Awarding Organisation's requirements.
- 8.3. Data is retained in accordance with Awarding Organisation retention periods, currently 5 years. Once data has been submitted and accepted by the relevant Awarding Organisation, we review whether continued retention is necessary. We do not retain data longer than is required for the purpose of the qualification.
- 8.4. Data is destroyed confidentially, paper documents are shredded, and digital records are securely deleted or anonymised.

9. Assessment & Verification Records

- 9.1. We collect assessment data from delegates in accordance with defined Awarding Organisation criteria. We retain original hard copies of all assessment documents and delegate registration forms, and send electronic copies to the Awarding Organisation detailing:
 - 9.1.1. What was assessed, when, and by whom.
 - 9.1.2. The assessment methods used.
 - 9.1.3. The assessment decision.
 - 9.1.4. Assessor and delegate original signatures.
- 9.2. All Internal Quality Assurance activity evidence and internal verification records are maintained for our assessors and candidates in accordance with agreed IQA plans. These are made available to the Awarding Organisation and their regulators upon request and stored on the Awarding Organisation's secure database.
- 9.3. We also collect data from our staff and employees for payroll, invoicing, and course administration. This data is handled in full accordance with current data protection principles and retained only for as long as required.
- 9.4. Anyone who has provided personal data to us has the right to request a copy of the information we hold about them at any time.

10. Website Cookies & Tracking Technologies

- 10.1. DPTrainingUK.com uses cookies and similar technologies in accordance with the Privacy and Electronic Communications Regulations 2003 (PECR), the UK General Data Protection Regulation (UK GDPR), and the Data (Use & Access) Act 2025.
- 10.2. A cookie is a small text file placed on a visitor's device when they access our website. Cookies enable the website to function correctly, recognise returning visitors, and, where consent has been given, support analytical and advertising activity.
- 10.3. Our website is hosted by Wix.com. Cookies are set both by Wix platform infrastructure and by third-party services integrated into our site, including Google Analytics, Meta (Facebook), and Amazon Web Services, which supports our Instagram feed integration.
- 10.4. We use the following categories of cookies on DPTrainingUK.com:
 - 10.4.1. **Strictly Necessary:** Required for the website to operate correctly. These include session management, security, load balancing, and consent preference cookies set by Wix and Amazon Web Services. No visitor consent is required for these cookies.
 - 10.4.2. **Analytics:** Set by Google Analytics to enable us to understand how visitors use our site, including page views and session data. These cookies are only set with your prior consent.
 - 10.4.3. **Performance:** Technical cookies that support the performance of third-party integrations embedded in our site. These cookies are only set with your prior consent.

- 10.4.4. **Advertisement:** Set by Meta (Facebook) to record visitor interactions with our website in connection with our Facebook advertising activity, enabling us to measure the effectiveness of our campaigns. These cookies are only set with your prior consent.
- 10.5. On your first visit to DPTrainingUK.com you will be presented with a cookie consent banner, giving you the option to Accept All, Reject All, or Manage your preferences by category. No optional cookies are set prior to your consent being given. A full list of the cookies in use on our site is available within the cookie preference manager on the banner.
- 10.6. You may change or withdraw your consent at any time by clicking the Cookie Settings option on our website. Withdrawing consent does not affect the lawfulness of any processing carried out prior to withdrawal.
- 10.7. You may also manage or delete cookies through your browser settings, though disabling all cookies may affect the functionality of this and other websites.
- 10.8. Where cookies are set by third parties — including Google, Meta, and Amazon Web Services — those organisations process data in accordance with their own privacy policies. DPTrainingUK is not responsible for the content of third-party privacy policies.
- 10.9. This section will be reviewed annually alongside the rest of this policy, or promptly if the cookies in use on DPTrainingUK.com change materially.

11. Summary

- 11.1. We collect and forward to our Awarding Organisations the registration, assessment, verification, and evaluation evidence from all courses.
- 11.2. We submit electronic copies of evidence to relevant Awarding Organisations, who archive for a minimum of 5 years.
- 11.3. We retain physical hard copies of registration documents, assessment decisions, course registers, and examination documents for 5 years, available for inspection upon request.
- 11.4. Where delegates request recognition of prior learning, exemption, or a credit transfer, we will contact the relevant Awarding Organisation to facilitate this.
- 11.5. Staff and employee data is stored securely and retained only for as long as required.
- 11.6. Website visitor data is collected via cookies and similar technologies in accordance with PECR, the UK GDPR, and the Data (Use & Access) Act 2025. Visitor consent preferences are managed through the cookie consent banner on DPTrainingUK.com, and no optional cookies are set prior to consent being given. Full details are set out in Section 10 of this policy.

Different Perspective Training Ltd.

Registered Company Office: The Old Barn,
Eddington Hill, Hungerford, Berkshire, RG17 0HA UK

Website: www.DPTrainingUK.com

Registered Company #: 10843621

Director & Lead Facilitator: Mr Matthew ILOTT

Email: matt@DPTrainingUK.com

Contact: 01488 685497 | 07921 769868

