

Data Protection Policy (UK GDPR)

Organisation: GLAS Business Solutions

Policy Owner: Director

Applies to: All staff, associates and contractors

Version: 1.0

1. Introduction

GLAS Business Solutions (GLAS) collects, processes, and stores personal data relating to employees, learners, apprentices, candidates, contractors, employers, customers, and other stakeholders in order to deliver education and training services, meet contractual and legal obligations, and fulfil its duties of care.

GLAS is committed to protecting personal data and to complying with the requirements of:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**

This policy sets out how GLAS meets its data protection responsibilities and safeguards the rights of individuals whose personal data it processes.

2. Purpose

The purpose of this policy is to ensure that all personal data is processed lawfully, fairly, and transparently, and in accordance with the data protection principles set out in UK GDPR.

This policy provides a framework for governance, accountability, and good practice in relation to personal data handling across GLAS.

3. Data Protection Principles

GLAS will ensure that personal data is:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary (data minimisation)
4. Accurate and kept up to date
5. Retained only for as long as necessary
6. Processed securely to protect against unauthorised or unlawful processing, loss, or damage
7. Processed in a manner that ensures appropriate accountability

4. Lawful Basis for Processing

GLAS will only process personal data where there is a lawful basis under UK GDPR. These include:

- Performance of a contract
- Compliance with a legal obligation



- Legitimate interests of GLAS (where not overridden by individual rights)
- Consent (where required and appropriate)
- Protection of vital interests
- Performance of a task carried out in the public interest

Where consent is relied upon, it will be freely given, specific, informed, and capable of being withdrawn.

5. Data Subject Rights

GLAS recognises and upholds the rights of individuals under UK GDPR, including the right to:

- Be informed about how their data is used
- Access their personal data (Subject Access Requests)
- Rectification of inaccurate data
- Erasure (where applicable)
- Restriction of processing
- Data portability (where applicable)
- Object to processing, including direct marketing
- Not be subject to automated decision-making

Subject Access Requests will be responded to **within one calendar month**, unless an extension is permitted under law.

6. Privacy Notices

GLAS provides clear and accessible Privacy Notices to learners, staff, employers, and other stakeholders explaining:

- What personal data is collected
- Why it is collected
- How it is used and stored
- How long it is retained
- Who it may be shared with
- How individuals can exercise their rights

Privacy Notices are reviewed regularly to ensure accuracy and compliance.

7. Data Security

GLAS takes appropriate technical and organisational measures to protect personal data, including:

- Role-based access controls
- Secure storage of paper and electronic records
- Use of encryption and secure systems where appropriate
- Staff training in data protection and information security



- Secure disposal of data when no longer required

All staff and contractors are required to complete basic data protection training and to comply with this policy.

8. Data Breaches

All actual or suspected personal data breaches must be reported immediately to the **Data Protection Lead**.

GLAS will:

- Investigate breaches promptly
- Take steps to mitigate harm
- Report notifiable breaches to the Information Commissioner's Office (ICO) within **72 hours**, where required
- Notify affected individuals where there is a high risk to their rights and freedoms

9. Data Retention and Disposal

Personal data will be retained only for as long as necessary and in line with GLAS retention schedules and contractual or regulatory requirements.

When no longer required, data will be securely destroyed or anonymised.

10. Roles and Responsibilities

Data Protection Lead

GLAS has appointed a **Data Protection Lead** with responsibility for overseeing compliance with this policy and UK GDPR.

Current Data Protection Lead:

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Staff Responsibilities

All staff, contractors, and associates are responsible for:

- Handling personal data securely
- Reporting data protection concerns or breaches
- Completing required training
- Following GLAS policies and procedures

11. Scope

This policy applies to all personal data processed by GLAS in any format, including paper, electronic, and verbal communications, and applies to all locations, including home and remote working.

12. Monitoring and Review

This document is reviewed:

- **Annually**, or



- Earlier if technology, guidance or organisational activity changes

Formal approval, version control and review dates are managed through the organisation's policy register.