



Data Protection Policy

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1 Mission Vision Values and Behaviours

1.1 Mission

Aspire Procurement Training exists to provide UK businesses with the next generation of aspiring supply chain professionals

1.2 Vision

To be the supply chain training provider of choice for apprenticeships and commercial courses, by putting the apprentice and the learner at the heart of everything we do

1.3 Core Values

- The passion and commitment to provide quality supply chain training
- The freedom from discrimination for all apprentices, learners, skills teachers, skills coaches and employees
- Continuous improvement through compliance to standards, adoption of best practice principles, and measurement against all performance targets

1.4 Behaviours

1.4.1 Be inspirational

- Our apprentices and learners perform best when they are inspired. Our whole team is passionate about the learning experience and committed to provide the best supply chain training

1.4.2 Add value

- We are focused on the value to the apprentice and the learner
- Both our study material and our teaching will bring to life the core academic content provided by our qualifying institutions
- Our skills trainers will be respected supply chain practitioners from a variety of industries and organisations and all will be MCIPS qualified
- Our teaching methods will be interactive and promote ethical best practice

1.4.3 Be inclusive

- We are advocates of inclusivity across all apprentices, learners, skills trainers, skills coaches and employees

1.4.4 Be a learner yourself

- Feedback and shared experiences will make us better. We are passionate about improvement
- We understand that learners have different learning styles. We will deliver our teaching in different formats and at a pace to suit the individual apprentice and learner

2 Policy Statement

Aspire Procurement Training's ("Aspire") vision is to be compliant with all data protection legislation. This includes the Data Protection Act and GDPR.

3 Purpose

This policy provides a framework for ensuring that Aspire meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18). It applies to all the processing of personal data carried out by Aspire including processing carried out by joint controllers, contractors, and processors.

4 Scope

Any Personal Sensitive Data (as defined by the Data Protection act) or Confidential Information (as defined in any legally binding contract containing this definition) exchange will always be subject to a separate, legally binding agreement.

5 Roles and Responsibilities

Aspire has appointed a data protection officer (DPO), who is responsible for overseeing questions in relation to this Policy. If you have any questions, including any requests to exercise your legal rights, please contact the DPO using the details below:

richard@cips-training.com

The **directors** are responsible for ensuring:

- that Aspire implements and follows all legislation relating to the safe collection, storage and disposal of Personal Data
- that Aspire remains certificated and registered with the ICO
- that all employees and associates of Aspire are adequately trained in the collection, storage and disposal of Personal Data
- that this policy is reviewed on an annual basis, or at any point that Aspire is required to abide by new legislation

All **employees** and **associates** are responsible for:

- adequately, collecting storing and disposing of Personal Data in accordance with this policy

6 Policy Implementation

6.1 Accreditation

Aspire will be registered with the ICO and accredited with Cyber Essentials certification at all times.

6.2 Personal Data Information

The type of Personal Data that may be collected are:

- Name
- Gender
- Title
- Address
- Date of Birth
- Email address
- Telephone number
- Emergency contact details
- CIPS membership number
- Unique Learner Number
- Academic results to prove prior learning
- Progress review notes, including exam and test results
- Special Education Needs
- Learning style preference
- Copy of proof of identity

6.3 Storage of Personal Data

Aspire takes the security of your Personal Data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers and partners, to protect your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have also put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Aspire can only keep your Personal Data for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The precise length of time we hold your Personal Data for varies depending on the individual circumstances, but in determining the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

6.4 Use of Systems

Aspire views systems as preferable to paper as a means of storing Personal Data.

We may hold your Personal Data on one or a number of our systems, but only for intended use. All systems will be access protected and have multi-factor authentication, where this feature can be enabled, in accordance with Cyber Essentials certification.

6.5 Sharing information with 3rd parties

Aspire will not share your Personal Data with 3rd parties.

6.6 Rights to access and erase your Personal Data

Under legislation, you may have the right to request access, transfer, rectification and/or erasure of the Personal Data that Aspire processes about you. You may also have the right to object to and/or restrict our processing of your Personal Data.

Should you wish to apply your rights, please contact our DPO as per the contact details above.

7 Monitoring and Review

This policy will be reviewed annually to ensure that it is up to date and compliant with the latest legislation.

The policy was last updated in September 2023 and is due for renewal in September 2024.

This policy may also be updated before the renewal date if legislation changes or if monitoring and review of performance suggests that practices should be altered.

8 Signature

A handwritten signature in black ink, appearing to read 'R. Slater', with a stylized flourish at the end.

Richard Slater
Director