A2A Qualifications
Turning Aspiration to Achievement

Data Protection and Privacy Policy

A2A Qualifications Limited

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Approver	Director
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Supersedes	A2A Training Data Protection Policy V4 (6 October 2024) and all earlier versions.
Applies to	All A2A personnel, assessors, internal quality assurers, associates and staff who handle personal data; and all individuals whose personal data A2A processes, including apprentices and learners, staff, and contacts at centres, training providers and employers.

1. Purpose and scope

This policy sets out how A2A Qualifications Limited ("A2A") collects, uses, shares, stores and protects personal data, and how it meets its obligations under the UK GDPR and the Data Protection Act 2018. It applies to all A2A personnel, assessors, internal quality assurers, associates and staff who handle personal data, and explains to individuals — apprentices and learners, staff, and contacts at centres, training providers and employers — how their personal data is handled.

2. Who we are

A2A Qualifications Limited is the data controller for the personal data described in this policy. A2A is registered with the Information Commissioner's Office (ICO), registration number ZB263774. Questions about this policy or about personal data can be sent to A2A's data protection lead, Louise Warren (Director), at info@a2aqualifications.co.uk.

3. Regulatory and policy context

A2A processes personal data under the UK GDPR and the Data Protection Act 2018, and is regulated by the ICO for data protection. As an Ofqual-recognised awarding organisation, A2A's assessment activity is also governed by the applicable **assessment plan** for each standard and by **Ofqual's recognition requirements**. Where any A2A internal policy or procedure differs from the applicable assessment plan or Ofqual's requirements, the assessment plan and Ofqual's requirements take precedence.

For context, the occupational standards and assessment plans are owned by Skills England; A2A is listed on the Apprenticeship Provider and Assessment Register (APAR); and responsibility for apprenticeships policy moved to the Department for Work and Pensions in September 2025. Some retention periods are set by funding and regulatory requirements.

Our data protection principles

A2A applies the principles set out in the UK GDPR. Personal data is:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes, and not used in incompatible ways;
- adequate, relevant and limited to what is necessary (data minimisation);
- accurate and, where necessary, kept up to date;
- kept no longer than necessary (storage limitation);
- kept secure, including against loss, damage or unauthorised access (integrity and confidentiality);
- handled in a way A2A can demonstrate and account for (accountability).

4. The personal data we process

Depending on a person's relationship with A2A, the personal data processed may include:

- **Apprentices and learners** – forename and surname, date of birth, sex, email and telephone, unique learner number (from the DfE), apprenticeship standard, start date, gateway date, expected end date and funding type; assessment activity including scheduled dates, assessment materials submitted, recordings of assessments, recorded feedback and results, and internal quality assurance activity.
- **Special-category and statistical data** – information such as age, sex, ethnic origin, and disability or health information relating to reasonable adjustments and special considerations.
- **Centre, training provider and employer contacts** – training provider name and coach or tutor contact details; employer name and address and line manager name, role and contact details.
- **Staff and associates** – personnel and contract records held for employment and audit purposes.
- **Marketing contacts** – names and contact details held where there is a lawful basis to do so.

5. Our lawful bases

A2A processes personal data where it has a lawful basis under UK GDPR Article 6. For administering and managing apprenticeship and end-point assessment, A2A relies on its legitimate interests and on contractual obligation. For marketing, A2A relies on consent and legitimate interests. Some processing may also be necessary to comply with a legal or regulatory obligation.

6. Special-category data

Some of the data A2A processes is special-category data — in particular ethnic origin, and health or disability information where an apprentice or centre chooses to declare it in relation to a reasonable adjustment, and for monitoring assessment outcomes. A2A processes special-category data only where, in addition to an Article 6 basis, a condition under UK GDPR Article 9 applies. A2A collects only what is necessary, and refers such processing for data protection sign-off.

7. How we use personal data

A2A uses personal data to administer and quality-assure assessment and any training it delivers; to register apprentices, conduct gateway and end-point assessment, record results and issue certificates; to meet regulatory and funding requirements; to manage relationships with centres, providers and employers; to support equality monitoring; and, where there is a lawful basis, for limited marketing.

8. Sharing personal data

A2A shares personal data only where necessary and lawful — for example with Ofqual and other regulators, the Department for Education, Skills England and the relevant funding body, and with centres, training providers and employers in connection with an apprentice's assessment. A2A discloses information beyond these routes only with appropriate authority and in line with the Conditions of Recognition. A2A uses third-party systems and processors to store and handle data under appropriate terms; where personal data is transferred outside the UK, it is protected by appropriate safeguards.

9. Systems we use

A2A uses secure, access-controlled systems to store and process personal data. These include Microsoft SharePoint, Microsoft Teams and Zoom, together with the end-point assessment platforms used to manage assessments (such as ACE360 and EPAPro). Paper-based records are scanned, uploaded securely and then securely destroyed. A2A asks apprentices and centres to take care over what they upload, to anonymise information where appropriate, and to remove confidential material that is not required for assessment.

10. Keeping data secure

A2A takes appropriate technical and organisational measures to protect personal data against loss, misuse or unauthorised access. Data is held on password-protected systems and is not shared externally without authority. A2A applies data protection by design and by default, and completes a data protection impact assessment before introducing high-risk new processing. Assessors, internal quality assurers and associates agree to maintain confidentiality as part of their induction and terms of engagement, and a breach of confidentiality is treated as a serious disciplinary matter. All staff who handle personal data undertake data protection training, and A2A retains evidence of this.

11. How long we keep data

A2A keeps personal data only for as long as necessary. Learner and assessment records are normally retained for six years after the apprentice completes, or longer where a funding or regulatory requirement applies. Other records are kept for as long as needed for the purpose for which they were collected, and are then securely destroyed.

12. Your rights

Individuals have rights over their personal data under the UK GDPR, including the right to be informed; to access their data (a subject access request); to rectification; to erasure; to restrict or object to processing; and to data portability, where these apply. There is no charge for exercising these rights,

and A2A will respond within one month, as required by law. Where A2A relies on consent, it can be withdrawn at any time by contacting info@a2aqualifications.co.uk.

Some information cannot be released where doing so would undermine the validity and integrity of assessment or A2A's duties as an awarding organisation under Ofqual's Conditions of Recognition — this includes, but is not limited to, assessment recordings and internal documents about an apprentice's assessment.

13. Personal data breaches

A2A takes all reasonable steps to prevent personal data breaches and to detect, report and investigate any that occur. Where a breach is likely to result in a risk to people's rights and freedoms, A2A will notify the ICO without undue delay and, where required, within 72 hours of becoming aware of it, and will inform affected individuals where the risk is high. Breaches are handled alongside A2A's complaints and malpractice arrangements as appropriate.

14. Marketing

A2A holds names and contact details for marketing only where it has a lawful basis, and asks people to opt in where required. A2A displays the logos or testimonials of organisations it works with only with their permission.

15. Complaints

Anyone with a concern about how A2A handles their personal data can raise it with A2A at info@a2aqualifications.co.uk. Individuals also have the right to complain to the Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; helpline 0303 123 1113; ico.org.uk.

16. Roles and responsibilities

- **Director / policy owner** – owns this policy, makes it available, and ensures it forms part of staff training.
- **Data protection lead** – advises on lawful bases and special-category processing, handles rights requests and breaches, and confirms processor terms.
- **Staff, assessors, IQAs and associates** – follow this policy, complete data protection training, and maintain confidentiality.

17. Related documents

- Reasonable Adjustments and Special Considerations Policy (A2A-RAS-POL-004)
- Malpractice, Maladministration and Sanctions Policy (A2A-MMS-POL-002)
- Conflict of Interest and Whistleblowing Policy (A2A-CIW-POL-003)
- Enquiries, Appeals and Complaints Policy (A2A-EAC-POL-001)
- Artificial Intelligence (AI) in Assessment Policy (A2A-AI-POL-005)

18. Version history

Version	Date	Owner	Summary of change
1.0	10 June 2026	Director	Rebuilt from A2A Training Data Protection Policy V4 (6 October 2024) into A2A Qualifications house style. Modernised to UK GDPR / Data Protection Act 2018: added data controller and ICO detail, lawful bases, special-category (Article 9) handling, data subject rights, breach notification, data sharing and complaints to the ICO. Retains V4 retention, security and confidentiality content; removed the blanket disclaimer of responsibility for data loss; updated identity, contacts and systems.