

Data Protection and Data Security Policy

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1. Policy Statement

Param Qualifications recognises that the effective protection of personal data and confidential information is fundamental to maintaining trust with learners, Delivery Centres, staff, associates and other stakeholders. The organisation is committed to ensuring that personal data is processed lawfully, fairly and transparently and that appropriate technical and organisational safeguards are in place to protect information against loss, misuse, unauthorised access or disclosure.

Param Qualifications processes personal data in connection with its operational, quality assurance and qualification-related activities. In doing so, the organisation seeks to uphold the rights of individuals and maintain the confidentiality, integrity and availability of the information it holds.

For the purposes of this policy, applicable data protection legislation includes the UK General Data Protection Regulation (UK GDPR), the **Data Protection Act 2018**, the **Privacy and Electronic Communications (EC Directive) Regulations 2003**, and any subsequent amendments or replacement legislation.

2. Purpose

The purpose of this policy is to:

- define Param Qualifications' approach to protecting personal data
- establish clear responsibilities for secure information handling
- ensure consistent and lawful processing practices
- protect information assets from accidental or deliberate compromise
- support compliance with applicable legal and regulatory requirements

This policy forms part of Param Qualifications' wider governance and risk management arrangements.

3. Scope

This policy applies to all personal data and confidential information processed by Param Qualifications, regardless of format, location or storage medium. It applies to:

- learners and prospective learners
- Delivery Centres

- staff, associates and contractors
- assessors and quality personnel
- employers and stakeholders
- third-party processors acting on behalf of Param Qualifications

The requirements of this policy apply to all systems, platforms, networks and manual records used in connection with Param Qualifications' activities.

4. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Special Category Data

Personal data requiring enhanced protection under UK GDPR, including information relating to health, disability or other sensitive characteristics.

Processing

Any operation performed on personal data, including collection, recording, organisation, storage, retrieval, use, disclosure, transfer or deletion.

Data Subject

The individual to whom the personal data relates.

Delivery Centres

Organisations approved by Param Qualifications to deliver or support its qualifications.

5. Data Protection Principles

Param Qualifications processes personal data in line with established data protection principles. Personal data will be:

- processed lawfully, fairly and transparently
- collected only for specified and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up to date where required
- retained only for as long as necessary

- protected by appropriate technical and organisational measures
- processed in a manner that demonstrates accountability

All staff and associated parties must have regard to these principles when handling personal data.

6. Responsibilities

6.1 Organisational Accountability

Param Qualifications retains overall accountability for ensuring that personal data is processed in accordance with this policy and applicable legislation. Senior management is responsible for promoting effective information governance, allocating appropriate resources and ensuring that suitable controls are implemented and maintained.

6.2 Data Protection Lead

Param Qualifications designates a Data Protection Lead responsible for:

- advising on UK GDPR obligations
- monitoring organisational compliance
- supporting the management of data incidents and breaches
- overseeing Data Protection Impact Assessments
- acting as a point of contact for data protection matters

6.3 Staff, Associates and Contractors

All individuals working on behalf of Param Qualifications are required to:

- maintain the confidentiality of personal data
- access only information necessary for their role
- follow organisational policies and procedures
- protect login credentials and system access
- ensure secure handling, transmission and storage of data
- immediately report any suspected data breach or security weakness

Any deliberate misuse of personal data or failure to follow this policy may result in disciplinary action or termination of contractual arrangements. Access permissions are

assigned based on role and location, with additional restrictions applied to non-UK remote staff handling sensitive learner data.

6.4 Delivery Centres

Delivery Centres must:

- process learner data in accordance with Param Qualifications requirements
- maintain appropriate technical and organisational safeguards
- ensure staff handling Param data understand their responsibilities
- promptly notify Param Qualifications of any suspected or actual data breach
- cooperate with monitoring, audit or investigation activities
- comply with contractual data protection obligations

7. Lawful Basis for Processing

Param Qualifications ensures that personal data is processed only where a valid lawful basis exists under UK GDPR. Depending on the nature of the activity, this may include:

- performance of a contract
- compliance with legal or regulatory obligations
- legitimate organisational interests
- consent where required

Where special category data is processed, additional lawful conditions and safeguards will be applied.

7.1 Why Param Qualifications Collects Personal Data

Param Qualifications collects personal data in order to effectively deliver its services, maintain accurate records and meet its legal and operational obligations. Personal data may be collected for purposes including the administration of qualifications, communication with learners and Delivery Centres, quality assurance activities, regulatory compliance and the maintenance of organisational records.

The organisation collects only the information that is necessary for specified and legitimate purposes and does not use personal data in ways that are incompatible with those purposes.

7.2 How Personal Data is Used

Personal data held by Param Qualifications may be used to support the development, delivery and quality assurance of qualifications and related services. This includes activities such as learner registration, assessment processing, certification, communication, monitoring of Delivery Centres and the fulfilment of legal or regulatory requirements.

Param Qualifications ensures that personal data is used in a manner that is fair, proportionate and consistent with the expectations of the individual.

8. Information Security Controls

Param Qualifications implements layered technical and organisational security measures designed to protect information assets. These include:

- role-based access controls and user authentication
- secure password and credential management
- controlled system and network access
- firewall and network protection measures
- encryption or pseudonymisation where appropriate
- secure methods for data transmission
- regular system backups and recovery arrangements
- physical security controls for paper and on-site records
- secure storage environments
- secure disposal and destruction procedures

Security controls are reviewed periodically to ensure they remain proportionate and effective.

8.1 How Param Qualifications Protects Personal Data

Param Qualifications applies a combination of technical and organisational safeguards to protect personal data against unauthorised access, loss, misuse or disclosure. Access to personal data is restricted to authorised individuals who require the information for legitimate business purposes.

Systems and networks are protected through appropriate security controls, and physical records are stored in secure environments. Param Qualifications also promotes staff awareness of information security responsibilities to support the effective protection of data.

Access to sensitive learner data is restricted based on role and location. Non-UK remote staff do not have unrestricted access to sensitive personal data. Any access provided is limited, controlled, and subject to appropriate security and monitoring arrangements in line with data protection requirements.

8.2 Removable Media and USB Device Controls

Param Qualifications recognises that removable media such as USB memory devices, portable hard drives or other external storage tools may create risks to the confidentiality, security and safeguarding of personal data if used inappropriately.

To minimise these risks, the organisation applies the following controls:

- Personal data, learner records or other sensitive information should not normally be stored on USB devices or other removable media unless there is a clear operational requirement.
- Where removable media must be used, only organisation-approved devices should be used and appropriate security protections such as encryption or password protection must be applied.
- Staff, associates and Delivery Centres must not copy learner information, assessment evidence or safeguarding-related information to personal USB devices or unapproved storage media.
- Any removable media containing organisational or learner data must be stored securely and protected against loss, theft or unauthorised access.
- Removable media must not be used in a way that could compromise the safeguarding, privacy or wellbeing of learners or other individuals.
- If a USB device or removable media containing organisational data is lost, stolen or suspected to be compromised, the incident must be reported immediately in accordance with the organisation's Personal Data Breach and Incident Reporting procedures.
- Param Qualifications may implement technical controls, monitoring or system restrictions to reduce the risk of unauthorised use of removable storage devices.

9. Data Accuracy and Quality

Param Qualifications takes reasonable steps to ensure that personal data is accurate, complete and kept up to date where necessary. Individuals and Delivery Centres are expected to notify Param Qualifications of any changes to personal information so that records can be corrected promptly.

10. Rights of Individuals

Individuals whose personal data is processed by Param Qualifications have rights under UK GDPR, including:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure (where applicable)
- the right to restrict processing
- the right to object
- the right to data portability (where applicable)

Param Qualifications maintains procedures to ensure such requests are handled within statutory timeframes.

10.1 Complaints and Concerns

Individuals who have concerns about how their personal data has been handled may raise the matter with Param Qualifications using the organisation's complaints process. Param Qualifications will investigate concerns appropriately and respond within reasonable timescales.

Where individuals remain dissatisfied, they have the right to lodge a complaint with the Information Commissioner's Office (ICO).

11. Data Sharing and Third-Party Processing

Where personal data is shared with Delivery Centres or external service providers, Param Qualifications ensures that:

- data sharing is lawful and proportionate

- appropriate contractual safeguards are in place
- processors provide sufficient security assurances
- access to shared data is limited to what is necessary
- international transfers are subject to appropriate safeguards

Third-party relationships are subject to due diligence and ongoing oversight.

11.1 Who Personal Data May Be Shared With

Where necessary and lawful, Param Qualifications may share personal data with Delivery Centres, service providers, regulators, awarding partners (where applicable), or other authorised bodies. Any sharing of personal data is carried out in a controlled and proportionate manner and is supported by appropriate contractual or legal safeguards.

Param Qualifications does not disclose personal data to third parties unless there is a legitimate basis for doing so.

12. Data Retention and Secure Disposal

Personal data is retained only for as long as necessary to fulfil its intended purpose and to meet legal, regulatory and operational requirements.

Param Qualifications maintains a Record Retention Schedule which defines retention periods and secure disposal methods. When data is no longer required, it is securely deleted, anonymised or destroyed.

12.1 How Long Personal Data is Retained

Param Qualifications retains personal data only for the period necessary to fulfil the purpose for which it was collected and to meet legal and operational obligations. Retention periods are subject to periodic review.

Once the retention period has expired and the data is no longer required, it is securely deleted or destroyed in accordance with approved disposal procedures.

13. Personal Data Breaches

Param Qualifications maintains procedures for the identification, reporting, recording and management of personal data breaches. Where a breach is suspected:

- the incident must be reported immediately
- the risk to individuals will be assessed

- the breach will be formally recorded
- the Information Commissioner’s Office (ICO) will be notified where required
- affected individuals will be informed where there is a high risk

Delivery Centres must notify Param Qualifications without undue delay of any breach involving Param data.

14. Data Protection Impact Assessments

Param Qualifications conducts Data Protection Impact Assessments where processing is likely to result in a high risk to the rights and freedoms of individuals, particularly when introducing new technologies, systems or large-scale processing activities.

15. Training, Awareness and Monitoring

Param Qualifications ensures that staff and relevant associates receive appropriate data protection and information security awareness. Compliance with this policy may be subject to monitoring, review or audit activity where appropriate.

16. Policy Review

This policy will be reviewed periodically to ensure that it remains effective, proportionate and aligned with legislative, regulatory and organisational developments.

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| Author | Approved by | Version Number | Issue Date | Review Date |
| <i>Param Qualifications Limited</i> | <i>Director – Param Qualifications Limited</i> | <i>1.0</i> | <i>30th Aug 2025</i> | <i>30th Aug 2026</i> |
| <i>Param Qualifications Limited</i> | <i>Director – Param Qualifications Limited</i> | <i>1.1</i> | <i>2nd Feb 2026</i> | <i>2nd Feb 2027</i> |