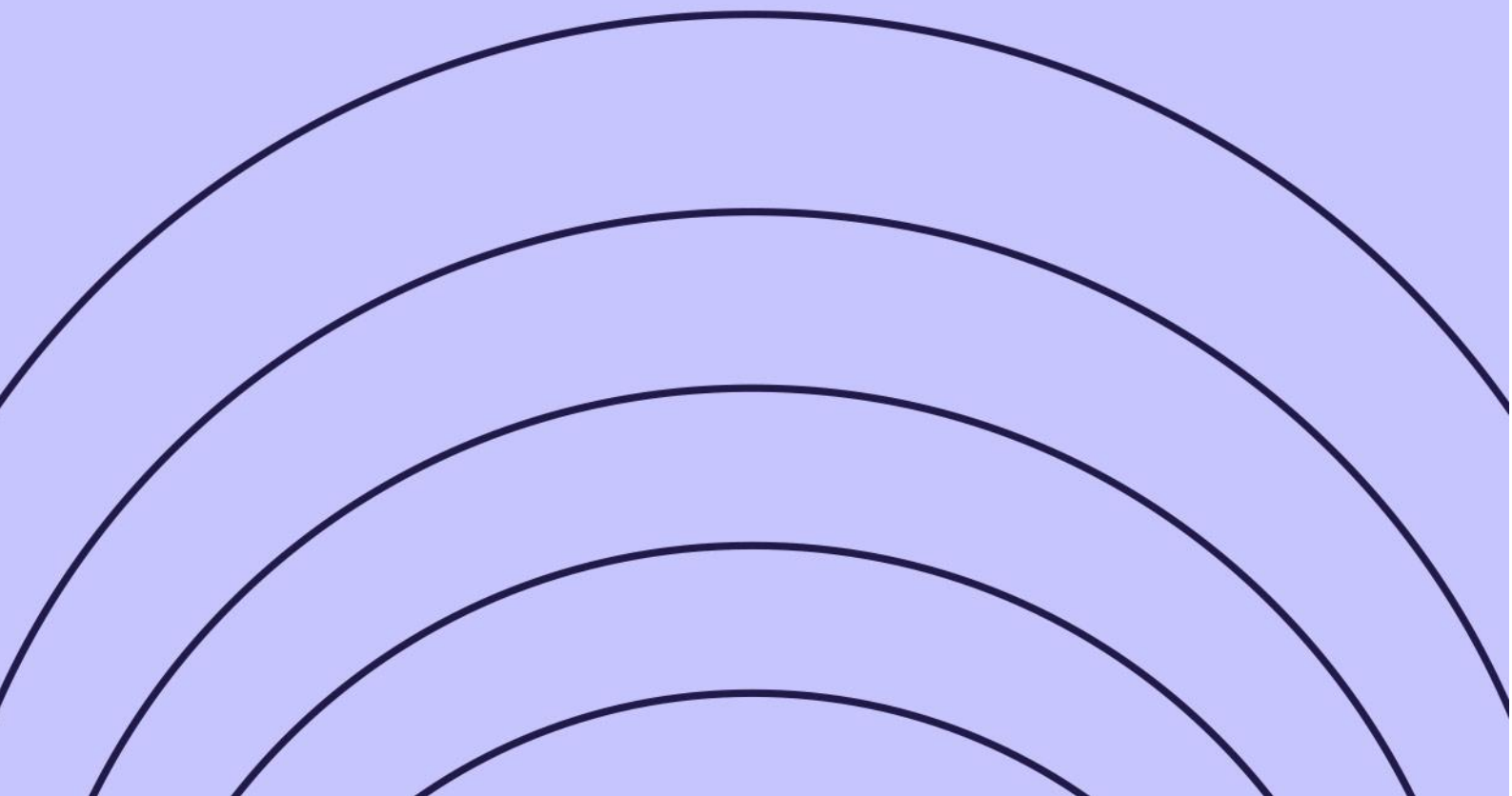




Pearson TQ Apprenticeships Data Protection Policy (GDPR)

Policy Version No 1.7 / 20th January 2026 / PTQ-012



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Background

This policy is in addition to the Pearson PLC Data Privacy Policy. Pearson TQ complies with the UK General Data Protection Regulation (GDPR). Pearson TQ may share information gathered on an individual with approved organisations such as the Department for Education (DfE) for administrative, statistical, health and safety and research purposes.

The GDPR gives individuals a number of rights regarding the information held about them. These rights are outlined in the Pearson TQ Apprenticeships Privacy Notice (Appendix A) which is distributed to all apprentice's at point of enrolment to their apprenticeship. If an individual wishes to exercise these rights they are requested to write to: Data Protection Officer, Pearson TQ, 9th Floor, 80 Strand, London, WC2 0RL.

In addition to the Privacy Notice, all apprentice's receive information on how their image is used and stored during the assessment phase of their Apprenticeship. This information is supplied in the form of a Photo/Video Waiver (Appendix B) with individuals requested to indicate as to whether they grant permission for the use of their image as outlined.

Document Retention

All documents are to be retained for the appropriate period of time. In most cases, this will be dependent upon the requirements of both internal and external stakeholders. The following table lists the 8 main categories of documents associated with the work of Pearson TQ Apprenticeships and states the period for which each category is to be retained:

Subject Matter	Retention time
Employers Liability Insurance Certificates	<i>Forty five years</i>
Learner Records	<i>Seven Years</i>
TQ Staff Management Records	<i>Three Years</i>
Assessor & Verifier Records	<i>Three Years</i>
Financial Records	<i>Three Years</i>
Self Assessment Records	<i>Three Years</i>
TQ Business and Development Plans	<i>Three Years (in secure storage)</i>
General Administration including contracts (eg SFA etc)	<i>Three Years</i>

Documents of a sensitive or confidential nature are to be stored securely.

In order to save space, some categories of records will be archived electronically. The same retention periods will apply to these records. Where a stakeholder requires original paper records to be retained this will be complied with.

Review of the Policy and Procedure

The Policy will be reviewed annually by Pearson TQ's Senior Management Team to ensure it is still valid and reflective of current best practice.

Document Version History

Version No	Date Revised	Revision Description	Revised By	Approved By
1.3	06/01/2021	Annual review – amended to reflect change to UK GDPR from 1/1/21	Neil Saunders	Martyn Leader
1.4	12/1/2022	Annual review – no updates	Neil Saunders	Martyn Leader
1.5	14/8/2023	Annual review – no updates	Neil Saunders	Martyn Leader
1.6	02/09/2024	Annual review – no updates	Neil Saunders	Martyn Leader
1.7	20/01/2026	Annual review – updated to new Pearson branding; references to ESFA replaced with DfE; URL links updated.	Neil Saunders	Martyn Leader

Appendix A – Privacy Notice

Pearson TQ (PTQ) is committed to data security and the fair and transparent processing of personal data. This privacy notice explains how we will treat the personal data which you provide to us in compliance with the UK General Data Protection Regulation (GDPR).

Pearson TQ is a wholly owned subsidiary of Pearson PLC and our registered address is 80 Strand, London, WC2R 0RL.

For the purposes of the GDPR, Pearson TQ is the ‘processor’ of the personal data you provide to us as part of your Apprenticeship.

The lawful bases PTQ use for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever we process personal data:

- **Consent:** the individual has given clear consent for PTQ to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract PTQ have with the individual, or because they have asked PTQ to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for PTQ to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone’s life.
- **Public task:** the processing is necessary for PTQ to perform a task in the public interest and the task has a clear basis in law.
- **Legitimate interests:** the processing is necessary for PTQ legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

For the purposes of your Apprenticeship we will only collect and process the minimum personal information required to fulfil our contractual responsibilities.

If you provide information to us about any person other than yourself, such as your relatives or next of kin, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for us to use it.

Your personal data will only be used to fulfil the requirements of Pearson TQ’s Apprenticeship contract. This includes:

- to meet the Education & Skills Funding Agency contractual requirements
- to provide you with the services required for you to complete your Apprenticeship. This includes the sharing of your personal data with appropriate approved Awarding Bodies and Assessment Organisations.

- to communicate with you in relation to your Apprenticeship
- to provide you with administrative support such as registration & certification, account creation, security and responding to issues

Further information on the Department for Education privacy policy and how your personal information is used by the DfE can be found at:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

We limit access to your personal data to only those who have a genuine and justified need to know it. Pearson TQ take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security responsibilities.

Your personal information will not be used by Pearson TQ for marketing purposes.

Your personal information will be retained for a period of seven years following the completion of your Apprenticeship. This is to ensure that we are able to comply with any contractual, legal, audit or other regulatory requirements.

Pearson TQ take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain aspects of your Apprenticeship programme, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Under the GDPR, you have various rights with respect to our use of your personal data:

- **Right to Access:** You have the right to request a copy of the personal data that we hold about you. We will respond within 30 days of request.
- **Right to rectification:** We aim to keep your personal data accurate and complete. Pearson TQ encourage you to inform your identified Pearson TQ point-of-contact if any of your personal data is not accurate or changes occur.
- **Right to erasure:** You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which it was collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed.

- **Right to object:** In certain circumstances, you have the right to object to the processing of your personal data where, for example, your data is being processed for direct marketing purposes.
- **Right to restrict processing:** In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where you have contested the accuracy of the personal data we hold about you and we are verifying the information or you have objected to the processing based on legitimate interests and your objection is being considered.
- **Right to data portability:** You have the right to request that some of your personal data is provided to you in a commonly used, machine-readable format.

Please note that the GDPR sets out exceptions to all of these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Contact details

If you have any queries about this notice, the way in which Pearson TQ processes personal data, or about exercising any of your rights, please speak to your Pearson TQ contact or write to Data Protection Officer, Pearson TQ, 9th Floor, 80 Strand, London, WC2 0RL

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Appendix B – Photo/Video Waiver

As part of the assessment of aspects of your Apprenticeship, Pearson TQ may wish to use either photos or video of you completing relevant tasks and activities. It is important that you understand who will have access to this evidence and where it will be stored. In addition, it is also important that you grant Pearson TQ permission to use photo/video of you within your Apprenticeship evidence.

Images will be securely stored in electronic format within either an e-portfolio or an internal Pearson online storage system.

Both systems are password protected with only authorised Pearson TQ staff allowed access.

In addition to the relevant Pearson TQ staff, images directly related to competency claims made as part of your Apprenticeship will potentially be viewed by external awarding body staff for means of quality assurance.

Pearson TQ will not use your image for any marketing or promotional activity without your express permission.

Pearson TQ reserves the right to use photos or video for internal training purposes.

The use of photo/video is not mandatory, and you have the right to refuse the use of these media within your Apprenticeship.

Upon successful completion of your Apprenticeship and the completion of the Awarding Body quality assurance process your e-portfolio containing the images will be archived and where applicable images will be deleted from the internal Pearson online system.

I understand the conditions of use of my image within photos or video as outlined above and give Pearson TQ permission to use either photos or video within my Apprenticeship.

I do not give Pearson TQ permission to use either photos or video within my Apprenticeship.

(tick as appropriate)

Name:	
Signature:	
Date:	