

Data Protection and Privacy Policy

1. Policy Statement

Clear Light Academy is committed to safeguarding personal data and respecting the privacy of all individuals with whom it works. This policy explains how personal data is collected, used, stored, and protected in relation to counselling training and education delivered by Clear Light Academy.

This policy applies to all students, tutors, assessors, internal quality assurers, staff, associates, and anyone whose personal data is processed by Clear Light Academy.

2. Legal Framework

Clear Light Academy complies with the following legislation and guidance:

- Data Protection (Bailiwick of Guernsey) Law, 2017
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (where applicable)
- CPCAB Data Protection and Privacy requirements

For the purposes of data protection law, Clear Light Academy acts as an independent Data Controller in relation to candidate and tutor data.

3. Data Controller and Contact Details

The designated lead for data protection at Clear Light Academy is:

Robert Winter, Risk and Compliance Lead
Email: robertjwinter@gmail.com

Any questions, concerns, or requests relating to personal data should be directed to the above contact in the first instance.

4. What Personal Data We Collect

Clear Light Academy may collect and process personal data including, but not limited to:

- Name, address, email address, contact details, in case of emergency contact details.

- Date of birth and identification details (where required)
- Course enrolment, attendance, and assessment records
- Learning reviews, assignments, and assessment outcomes
- Reasonable adjustment or special consideration information
- Correspondence relating to training, assessment, appeals, or complaints

Some data may constitute special category data, such as information relating to health, disability, or learning differences. This data is processed only where necessary and in accordance with the law.

5. Lawful Basis for Processing

Personal data is processed on one or more of the following lawful bases:

- Performance of a contract (delivery and assessment of training)
 - Compliance with legal and regulatory obligations
 - Legitimate interests relating to education delivery and quality assurance
 - Explicit consent, where required (particularly for special category data)
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6. Sharing of Data

Clear Light Academy may share relevant personal data with:

- CPCAB, for candidate registration, assessment, certification, quality assurance, and regulatory purposes
- The Learning Records Service (LRS), where applicable, for the issuing or verification of Unique Learner Numbers (ULNs) and Personal Learning Records
- Regulatory or legal bodies where required by law

Data is never shared for marketing purposes and is only shared where there is a clear and lawful requirement.

7. Data Security and Storage

Appropriate technical and organisational measures are in place to protect personal data against unauthorised access, loss, misuse, or disclosure. These include

password protection, restricted access, and secure electronic storage. Access to personal data is limited to those who require it for legitimate purposes.

This includes the secure storage and handling of learner portfolios, assessment records, and reflective learning materials, with access restricted to authorised assessment and quality assurance personnel.

8. Data Retention

Personal data is retained only for as long as necessary to meet educational, legal, regulatory, and quality assurance requirements. Retention periods are informed by CPCAB guidance and data protection legislation.

Candidates should be aware that certain assessment and certification data may need to be retained long-term in order to verify qualifications and prevent fraud.

9. Individual Rights

Individuals have rights in relation to their personal data, including the right to:

- Be informed about how their data is used
- Access the personal data held about them
- Request rectification of inaccurate data
- Request erasure of data, where applicable
- Restrict or object to processing in certain circumstances
- Request data portability

Requests should be made in writing to the Data Protection contact listed above. Requests will be responded to within statutory timescales.

10. Data Breaches

Any suspected data breach will be investigated promptly and managed in accordance with legal requirements. Where required, breaches will be reported to the relevant authority and affected individuals will be informed.

11. Complaints

If an individual has concerns about how their personal data is handled, they are encouraged to raise this initially with Clear Light Academy using the contact details above.

If concerns cannot be resolved, individuals may raise a complaint with:

Office of the Data Protection Authority (Guernsey)
Block A, Lefebvre Court
Lefebvre Street
St Peter Port, GY1 2JP
Email: info@odpa.gg

12. Review

This policy is reviewed regularly to ensure ongoing compliance with legislation, CPCAB requirements, and good practice.

Date of policy: January 2026

Review date: January 2027