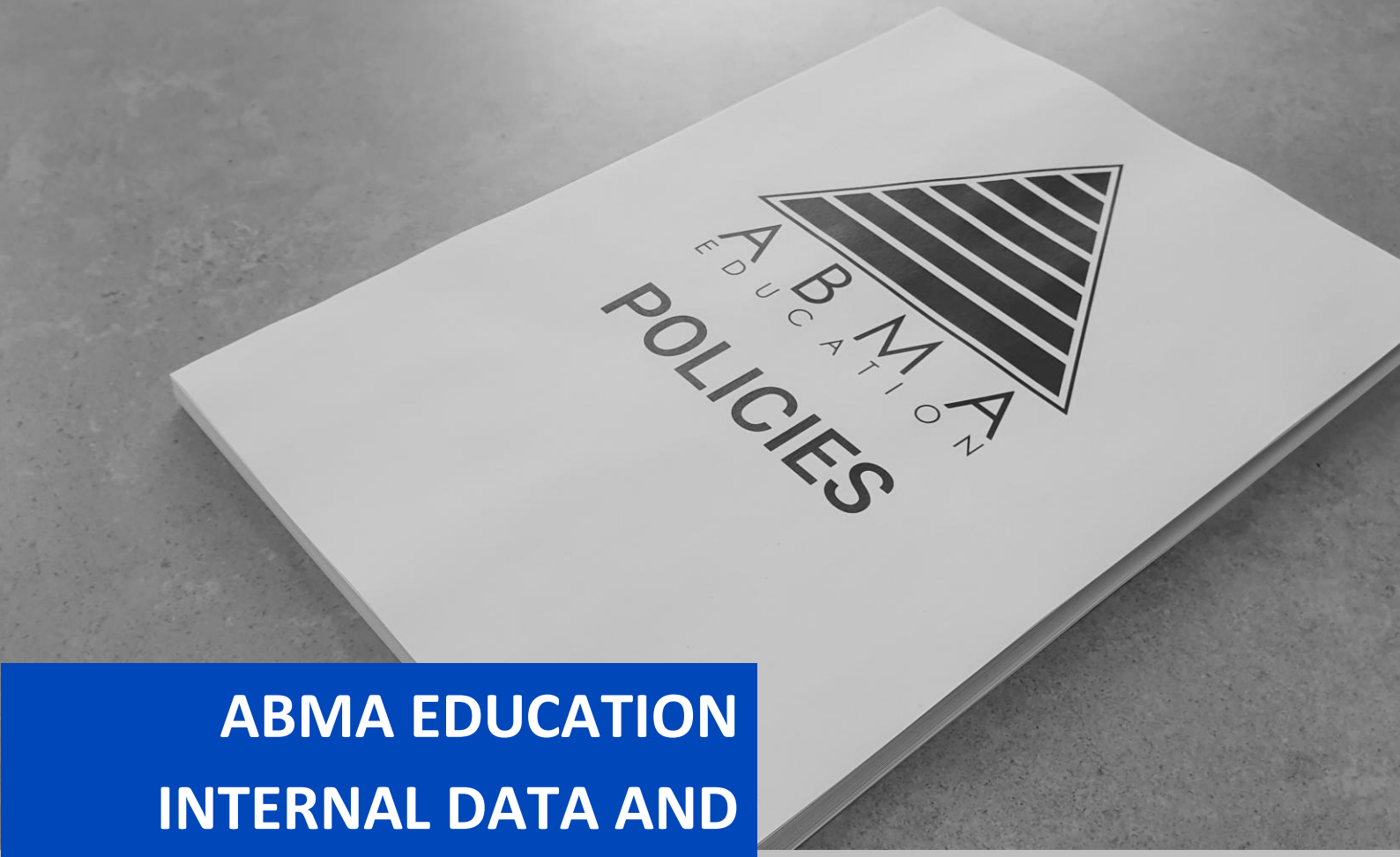

ABMA EDUCATION INTERNAL DATA AND PRIVACY POLICY IPP/POL/010

ABMA
EDUCATION

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ABMA Education Internal Data and Privacy Policy

Introduction

This internal policy outlines how ABMA Education ('ABMA', 'we') collects, stores, and protects personal data, including where automated or AI systems may be used. It applies to all staff, contractors, and authorised third parties.

Review arrangements

We will review this policy annually as part of our self-evaluation arrangements and revise it as and when necessary, whenever new AI or automated systems are introduced or modified, or in response staff feedback or changes in regulation and/or legislation.

1. Purpose and scope

This policy sets out ABMA Education's approach to collecting, processing, storing, sharing, and protecting personal data. It ensures compliance with UK GDPR, the Data Protection Act 2018, and related legislation.

2. Roles and responsibilities

All staff, contractors, and partners are responsible for compliance. The Data Protection Lead oversees implementation and monitoring.

3. Principles of data protection

Personal data is collected directly or indirectly for legitimate purposes such as qualification administration, assessment, payments, and regulatory compliance. AI-assisted tools may support these processes but never make legally significant decisions without human oversight.

4. Collection and use of personal information

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5. Special categories of data

Sensitive information, such as health or ethnicity data, is processed only when necessary and lawful, with strict safeguards.

6. Data storage and security

All data is securely stored using encryption and access controls. AI systems processing personal data must undergo security and bias assessments.

7. Data sharing and third-party processing

Information may be shared with centres, regulators, IT or AI service providers, and advisers under binding confidentiality and data protection agreements.

8. Data retention

Personal data is retained for at least six years or as required by law, then securely deleted or anonymised.

9. Data subject rights

Individuals may request access, rectification, erasure, restriction, or objection. Staff must forward such requests to the Data Protection Lead immediately.

10. Automated decision-making and AI governance

ABMA Education may use artificial intelligence (AI) or machine learning systems to assist in administrative, analytical, or research processes. These systems are designed to support, not replace, human decision-making.

Any AI system used to process personal data must:

- be approved by the Data Protection Lead before deployment;
- undergo a Data Protection Impact Assessment (DPIA) and security review;
- include a mechanism for human review before any decision that may have legal or significant effects on an individual.

AI systems are prohibited from independently determining assessment outcomes, qualification results, or eligibility decisions without human validation.

11. Use of AI tools and data sharing

Staff may occasionally use AI-assisted tools (e.g. writing, summarisation, or analytical software) to support their work. However, strict data handling rules apply:

What staff may share with AI tools:

- anonymised text or generic content that does not contain personal, confidential, or commercially sensitive information;
- training materials, policies, or learning resources that are already public;
- non-identifiable metadata or aggregated statistics, if explicitly authorised.

What staff must NOT share with AI tools:

- personal data about learners, centres, staff, or examiners (including names, emails, phone numbers, IDs, or addresses);
- examination materials, questions, or unpublished content;
- regulatory correspondence or compliance documentation;
- confidential business information, such as centre performance data or commercial agreements;
- any internal investigation or complaint records;
- drafts or content marked 'confidential', 'restricted', or 'internal use only'.

Staff must assume that information entered into any public AI tool could be stored, reproduced, or shared outside ABMA's control. Only AI systems approved by the Data Protection Lead or IT Manager may process ABMA data.

12. Training and compliance

All staff complete annual data protection training, with additional training for AI system users. All staff must complete training on the responsible use of AI systems, including guidance on what information can or cannot be shared. Breaches of this policy will be treated as data protection violations and may lead to disciplinary action.

13. Breach reporting

Any suspected breach must be reported immediately to the Data Protection Lead. ABMA will investigate and notify authorities if required.

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