



Data Protection Policy

Introduction

Ash Training holds and processes information about trainees, corporate clients, and other data subjects for administrative, approval and commercial purposes. When handling such information, Ash Training, and all staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 2018 (the Act). In summary these state that personal data shall:

- be processed fairly and lawfully,
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject's rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

Definitions

• "Staff", "trainees" and "other data subjects" may include past, present and potential members of those groups including other terms including

- Student
- Delegate
- Trainer
- Assessor
- Highfield, etc.

• "Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees, approving, awarding and monitoring organisations and bodies etc.

• "Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

Notification of Data Held

Ash Training shall notify all staff and trainees and other relevant data subjects of the types of data held and processed by Ash Training concerning them, and the reasons for which it is processed. The information which is currently held by Ash Training and the purposes for which it is processed are set out in the Appendix 1 to this Policy. When processing for a new or different purpose the **Appendix A** will be amended.



Responsibilities

All people on which information is held.

- ensure that all personal information which they provide to Ash Training is accurate and up-to-date
 - inform Ash Training of any changes to information, for example, changes of address;
 - check the information which Ash Training shall make available from time to time, in written or automated form,
 - inform Ash Training of any errors or, where appropriate, follow procedures for up-dating entries on computer forms.

Ash Training shall not be held responsible for errors of which it has not been informed.

Staff shall ensure that:

- all personal information is kept securely;
- personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

When staff supervise trainees doing work which involves the processing of personal information, they must ensure that those students are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

Delegate / Client Responsibilities

All delegates / clients shall:

- ensure that all personal information which they provide to Ash Training is accurate and up-to-date;
- inform Ash Training of any changes to that information, for example, changes of address;
- check the information which Ash Training shall make available from time to time, in written or automated form, and inform Ash Training of any errors.

Ash Training shall not be held responsible for errors of which it has not been informed.

Rights to Access Information

Staff, Trainees, Corporate Clients, Approving or Awarding Bodies and other data subjects in Ash Training have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to Ash Training

Ash Training will make a charge of £10 for each official Subject Access Request under the Act.

Ash Training aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Information Security Officer to the data subject making the request.



Subject Consent

Ash Training may ask for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma, arthritis. Ash Training will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency or in carrying out physical activities.

The Data Controller and the Designated Data Controllers

Ash Training is the data controller under the Act, and is ultimately responsible for implementation.

Assessment Marks & Delegate Certificates

Delegates shall be entitled to information about their marks for assessments, however this may take longer than other information to provide. Ash Training may withhold enrolment, awards, certificates, accreditation or references in the event that monies are owing to Ash Training

Retention of Data

Ash Training and Highfield will keep different types of information for differing lengths of time, depending on legal, awarding or approving body and operational requirements.

Compliance

Compliance with the Act is the responsibility of all trainees and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings.

Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with Ash Training

Appendix A

Information Processing

Personal information may need to be processed for the following purposes:

- Staff, Agent and Contractor Administration
- General Advice Services
- Accounts & Records
- Education Training
- Trainee and Staff Support Services
- Research
- Use by Health & Safety Executive for monitoring and approvals
- To meet statutory duties
- Qualification Awarding Bodies for monitoring and approvals
- Approval and monitoring bodies and organisations for monitoring and approvals
- Trainees Employer or Engager for statutory duties or training provision
- Training & Qualification verification.
- Quality Assurance.



Notes:

- Information relating to Trainee Qualification may be assessed by the public to check the validity of a Certification or Qualification. Highfield membership may also be made available to the public, however address information can be withheld on request.

Date of last review 2nd February 2015