



Data Protection Policy

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Responsibility: Envisage Business Partners

Version 3

Data Protection Policy

Aim

To ensure that Envisage business operations meet the requirements of the Data Protection Act 1998.

This policy covers all records (manual or electronic) held by Envisage including any personnel data as long as those records are structured either by reference to an individual or to criteria relating to the individual, so it is readily accessible.

Procedure

To comply with the act, Envisage operates to the 8 key principles set out with the legislation. Namely that the data that we collect on our students and team members will be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose
- Accurate
- Not kept longer than necessary for the purpose
- Processed in line with the data subject's rights
- Be kept secure from unauthorised access, accidental loss or destruction
- Not transferred to people or organisations situated in countries without adequate protection

Fair and lawful processing

We will inform all our learners and team members that we are the sole controller of their data and all data is to be processed by us. We will inform learners and team members about the identities of anyone to whom the data may be disclosed or transferred and where necessary seek the data subject's consent prior to this process.

Processing for limited purposes

Personal data will only be processed for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by the Act and data subjects will be informed of any new purpose before processing occurs.

Adequate, relevant and non-excessive processing

Personal data will only be collected to the extent that it is required for the specific purpose notified to the data subject.

Accurate data

Personal data must be accurate and kept up to date and steps will be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data will be destroyed.

Timely processing

Personal data will not be kept longer than is necessary for the purpose for which it is intended.

Processing in line with data subject's rights

Data subjects have a right to:

- Request access to any data held about them by Envisage
- Prevent the processing of their data for direct-marketing purposes
- Ask to have inaccurate data amended
- Prevent processing that is likely to cause damage or distress to themselves or anyone else

Data security

Envisage will ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. To ensure data security:

- Access to our databases is restricted through password protection. Only team members nominated by the Envisage partners have access to the system
- Envisage computers and other data storage devices are secured to protect against theft of machinery and thus loss of data. Files that hold confidential information of any kind are kept secure (personal information is always considered confidential)
- Paper documents that are not required for archiving are shredded. Any portable storage devices that contain personal information are physically destroyed when they are no longer required.
- Envisage team members will ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.
- All Envisage computers will be protected by up to date virus protection
- Envisage will ensure that all of its team members are made aware of their specific responsibilities in respect of the Data Protection and Computer Misuse Acts and will abide by all legislation and current good practice

Dealing with requests for information

Any request for personal information received by an Envisage team member will be forwarded to either of the Envisage partners for further action.

The Envisage partners will only consider requests for information when received formally in writing.

Decisions upon specific requests will be considered following consultation with our partners and will comply fully with our statutory obligations.

Data collected by Envisage is only used for the purpose of the training service we provide. We do not disclose any information to anyone for any other purpose.

Archiving of records and documents

Records and documentation retained by Envisage will only be stored for the legally required length of time.

Records shall be made available, to our partners and other stakeholders where formally agreed or when there is a legal obligation to do so.

When the required storage period has expired and all other reasons for retention exhausted, records shall be destroyed upon the authorisation of the Envisage partners.

The documents and records retained by Envisage will be managed as shown in the tables below:

Personnel / Payroll	Recommended minimum Retention Period
Appraisal records	Employment/agreement duration + 6 years
Maternity pay records	6 years + current year
New starter forms	Employment duration + 6 years
P60 forms	6 years + current year
P45 forms	6 years + current year
Pay slips - copy	7 years
Payroll cheque listings	6 years + current year
Payroll control account reconciliation records	6 years + current year
Payroll tabulations	6 years + current year
Payroll tabulations – year end	6 years + current year
Personnel files	6 years after employment has ceased
Redundancy Documentation	6 years + current year
Sickness records	6 years + current year
Tax and NI details	6 years + current year
Taxable benefit details	6 years + current year

Finance	Recommended minimum Retention Period
Bank paying-in books	7 years
Collection and Deposit books	6 years
Paying-in books	6 years

Health and Safety	Minimum Retention Period
Administration	2 years (electronic)
Risk assessments	1 year
Written operating procedures	3 years
Completed accident forms & f2508 [RIDDOR] forms	indefinitely

Learner information	Minimum Retention Period
Learner personal details	1 year unless additional permission for marketing is agreed
Registrations	1 year
Assessment results	1 year by Envisage, 6 years by the awarding body
Qualification or unit achievements	1 year by Envisage, 6 years by the awarding body

The above information will not be shared with other parties than Envisage and the awarding body

Other	
Learner images and testimonials	Will not be used unless learner permission is obtained