



# **Data Protection Policy**

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**Last Reviewed – May 2019**

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**Responsibility: Envisage Partners**

**Version 4**

## **Statement**

### **Why do we collect personal data?**

We collect details and information from our learners in order to ensure eligibility for their chosen training programme, register them for the qualifications they are working towards, maintain contact with them throughout their learner journey and ensure the best possible experience and outcome for them by screening for any special requirements they may have.

### **What personal data do we collect?**

- Personal details as required by the awarding organisation.
- Evidence of eligibility for the training programme
- Screening for health and learning support
- Contact details.
- Records of progress and achievement

### **How long do we keep personal data for?**

For self-funding learners, we destroy/delete all data after 3 years.

For funded learners we keep everything required by the funding agency for the required length of time; this may vary according to the funding agency and the type of funding involved.

### **When do we use personal data to contact our customers?**

Once learners have successfully completed their qualification and they have received their certificate we would normally not contact them again unless they have indicated that they would like to join our mailing list. We ask all learners about this at the end of their course on our course evaluation form. For learners that indicate that they do want to be contacted, we only use the email provided on this form, all other personal data would be destroyed/deleted as normal after 3 years and they are able to unsubscribe from our mailing list at any time.

Occasionally, the statutory organisations that we deal with, may require us to contact previous learners as part of their validation or quality assurance processes; this would normally be within 12 months of attending a course.

### **Which statutory organisations do we share data with?**

- YMCA Awards <http://www.ymcaawards.co.uk>
- Learner Records Service <https://www.gov.uk/education/learning-records-service-lrs>

# **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**

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 stated or legally required length of time.

Records shall only be made available to the statutory organisations we deal with or other organisations when there is a legal obligation to do so.

When the required storage period has expired and all other reasons for retention exhausted, records will be deleted/destroyed.

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

| <b>Accounts</b>  | <b>Retention Period</b> |
|------------------|-------------------------|
| All records      | 5 years                 |
| Summary accounts | Indefinitely            |

| <b>Health and Safety</b>                         | <b>Retention Period</b> |
|--|-------------------------|
| Completed accident forms & f2508 [RIDDOR ] forms | indefinitely            |

| <b>Learner information – self funding</b> | <b>Retention Period</b>  |
|---|--|
| Personal details                          | Max 3 years unless additional permission for marketing is agreed |
| Registrations                             | Max 3 years  |
| Assessment results                        | Max 3 years  |
| Qualification or unit achievements        | Max 3 years  |

| <b>Learner information – funded</b>                 | <b>Minimum Retention Period</b>  |
|---|--|
| Personal details                                    | As required by funding body unless additional permission for marketing is agreed |
| Any additional information required by funding body | As required by funding body  |
| All reports relating to learner journey             | As required by funding body  |
| Registrations                                       | As required by funding body  |
| Assessment results                                  | As required by funding body  |
| Qualification or unit achievements                  | As required by funding body  |

The above information will not be shared with other parties than Envisage, the awarding organisation, ESFA and student loans company as appropriate.

| <b>Other</b>                    |  |
|---------------------------------|--|
| Learner images and testimonials | Will not be used unless learner permission is obtained |