

General Data Protection Regulation Policy

Additional/changed information that was not on last year's policy is highlighted in yellow

Park Hill Training needs to collect and use certain types of information about its members and other individuals who encounter them. This personal information must be dealt with properly however it is collected, recorded, and used – whether on paper, in a computer, or recorded on other material.

Park Hill Training regards the lawful and correct treatment of personal information as very important and therefore ensures that personal information is treated lawfully and correctly. To this end Park Hill Training fully endorses and adheres to the Principles of Data Protection, as detailed in the General Data Protection Regulation 2018. Park Hill Training ICO registration reference Z2302502.

Scotland has its own information commissioner if applicable and required.

Specifically, the Principles require that personal information.

- 1. shall be processed fairly and lawfully and shall not be processed unless the following specific conditions are met:
 - a. We have checked that consent is the most appropriate lawful basis for processing the data.
 - b. We have informed our customers that the personal data we hold is for the purpose of training and certification only, will be kept securely, not passed onto a third party without their permission and by completing the activation online including accepting our terms our candidates are agreeing to Park Hill Training using their data for this purpose.
 - c. Consent will not be gained through pre-ticked boxes or a default consent.
 - d. We use clear plain language which is easy to understand.
 - e. We have named our organisation and any third-party controllers who will be relying on the consent.
 - f. We have informed individuals that they can withdraw their consent.
 - g. We keep a record of when and how consent was obtained from the individual.
 - h. We keep a record of exactly what they agreed to at the time of consent.
 - i. We will regularly review consents to check that the relationship, the processing, and the purposes have not changed.
 - j. We will make it easy for individuals to withdraw their consent at any time by clearly publicising how to do so.

- k. We undertake to act promptly on withdrawals of consent.
- I. We will not penalise individuals who wish to withdraw their consent.
- m. We allow individuals to access and control their own data.
- n. We do not keep any verification documents on file once these have been checked and confirmed on our system.
- 2. shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes,
- 3. shall be adequate, relevant, and not excessive in relation to the purpose or purposes of the Awarding Organisation for which they are processed,
- 4. shall be accurate and, where necessary, kept up to date or deleted,
- 5. shall not be kept for longer than is necessary for the purpose of the certificating Awarding Organisation,
- 6. shall be processed in accordance with the rights of data subjects under the General Data Protection Regulation 2018,
- 7. appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data,
- 8. shall not be transferred to any third party without the express permission of the individual or company whose data is held.

(GDPR 2018 Continued)

Park Hill Training will, through appropriate management, strict application of criteria and controls

- 1. observe fully conditions regarding the fair collection and use of information,
- 2. meet its legal obligations to specify the purposes for which information is used,
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal and Awarding Organisation requirements,
- 4. Copies of passports, driving licences and any other form of photographic ID are used to verify the identity of the candidate and then destroyed.
- 5. Centres collecting information on behalf of Park Hill Training are expected to ensure that they abide by the GDPR 2018.
- 6. ensure the quality of information used,
- 7. apply strict checks to determine the length of time information is held is not more than Awarding Organisation requirements,
- 8. ensure that the rights of people about whom information is held, can be fully exercised under the regulation.
- 9. take appropriate technical and organisational security measures to safeguard personal information,
- 10. treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for information,
- 11. set out clear procedures for responding to requests for information.

(GDPR 2018 Continued)

In addition, Park Hill Training will ensure that:

- 1. there is someone with specific responsibility for Data Protection. Park Hill Training's current Data Protection Officer is the Company Secretary Mrs Suzanne Wells.
- 2. everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice,
- 3. everyone managing and handling personal information is appropriately trained to do so,
- 4. everyone managing and handling personal information is appropriately supervised,
- 5. anybody wanting to make enquiries about handling personal information knows what to do,
- 6. queries about handling personal information are promptly and courteously dealt with,
- 7. methods of handling personal information are clearly described,
- 8. a regular review and audit is made of the way personal information is held, managed and used,
- 9. methods of handling personal information are regularly assessed and evaluated,
- 10. performance with handling personal information is regularly assessed and evaluated,
- 11. a breach of the rules and procedures identified in this policy by a member may lead to disciplinary action being taken,
- 12. a breach of the rules and procedures identified in this policy by a member is a potential breach of the Code of Conduct.

This policy will be updated as necessary to reflect best practice in data management, security, and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation 2018.

Date: 19.04.2018

Review Date: 14.5.2025