

First Aid Training plus (FATplus)

Data Protection Policy

First Aid Training plus

www.firstaidtrainingplus.co.uk

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Overview

The General Data Protection Regulation (GDPR) is a regulation, which requires any business that processes data belonging to UK & EU citizens to protect it and not misuse it.

First Aid Training plus (**FATplus**) is a training company delivering first aid training courses and accredited and regulated first aid qualifications to groups and individuals.

ITC First Ltd (**ITC**) is the Awarding Organisation for the regulated and accredited first aid training courses delivered by FATplus and associated trainers.

FATplus is a registered training centre with ITC.

ITC requires all centres delivering ITC qualifications to use approved ITC assessment and verification documents and allow access to data by ITC and the external qualification regulators (Ofqual, SQA Accreditation and Qualifications Wales) on request.

ITC also requires all centres delivering ITC qualifications to retain sufficient assessment and verification records to allow for the review of assessment over time.

The aim of this policy is to clearly outline the following:

- 1. Who is responsible for collecting and processing data**
- 2. Why we collect and process personal data**
- 3. What data is collected and processed**
- 4. How data is stored and processed**
- 5. How data is used**
- 6. How long data is retained and why**
- 7. What rights you have over your data**

As a responsible training company FATplus and associated trainers aim to meet the highest standards when collecting, processing and using personal information. We encourage clients, trainers or anybody else involved with our activities to bring to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We also welcome any suggestions for improving our procedures.

1) Who is responsible for collecting and processing data

- **Data Controller** = FATplus is a training company and as such responsible for determining what data is collected, processed, stored and how it is used in relation to FATplus business.

FATplus Responsible Officer for Data Protection: Andrea Bonacker, Training Manager, First Aid Training plus, 7 Tinkerfield, Preston, Lancashire PR2 9RT

- **Data Processor** = FATplus is also a training centre contracted through and registered with the Awarding Organisation ITC First Ltd (ITC) to offer clients the option of gaining accredited first aid qualifications and certificates. In this capacity FATplus and associated trainers are collecting, processing and storing data as required by ITC as the Data Controller.

ITC Responsible Officer for Data Protection: Mark Moore, Chief Executive Officer, ITC First, Victoria Building, Victoria Street, Hartlepool, TS24 0LB

2) Why does FATplus collect individuals data?

- **Contractual Basis** = FATplus collects and processes data in relation to client enquiries and the process of entering into a contract of service by booking a training course(s)
- **Legitimate Basis** = Where clients request to be issued with accredited first aid qualifications and certificates as part of their contract with FATplus, data is collected and processed as required by ITC to allow qualification credits to be awarded and certificates to be produced. Therefore in relation to the legitimate basis FATplus is acting as Data Controller for and on behalf of ITC.

3) What type of data is collected and processed?

- **Contractual data** = For the purpose of answering client enquiries and the process of entering into a contract of service by booking a training course(s) FATplus collects the following personal data: First Name, Surname, Email, Telephone, Mobile Number. Where invoices are issued to individual clients FATplus may also collect the following personal data for this purpose: Address, Town, Country, Postcode.

- **Legitimate data** = For the purpose of providing clients with accredited first aid qualifications and certificates as part of their contract with FATplus the following data is collected and processed for and on behalf of ITC: First Name, Surname, Email, Telephone, Mobile, Address, Town, County, Postcode, Country, Date of Birth. This data is collected by means of a learner registration form
- **Special category data** = ITC also collects special category (sensitive data) e.g. Gender, National Identity, Ethnic Group, Special needs, which they are required to monitor and regularly report on by their external qualification regulators (Ofqual, SQA Accreditation and Qualifications Wales). The provision of this data by learners is not mandatory.
- **Evaluation data** = On completion of a training course learners are issued with an ITC evaluation form to complete on the day of the course; this is optional and can include the learners name and email address.
- **Photographs** = Where FATplus trainers take photographs during a training course, participants will be asked for their consent for this prior and again on the day of the course.

4. How is data stored & processed?

- Personal data collected in paper format during a training course (learner registration forms) will be stored securely and out of sight of any unauthorized individuals.
- After completion of a training course, learner registration forms and other associated course paperwork will be securely stored in a lockable filing cabinet in FATplus office.
- Personal data collected through learner registration forms is then manually transferred into password protected, encrypted ITC database by FATplus staff; usually this happens either on the day of course delivery or within 1-2 days of a course having been delivered.
- Data submitted to the ITC website is only be viewable by FATplus and ITC via individual unique user log on and password.
- FATplus does not share their log on and passwords with any unauthorised individuals or companies.
- Once data has been processed, all paperwork pertaining to a training course is then posted by registered mail to ITC offices.

5. How is data used?

When individuals provide their data to FATplus, the data is used to:

- a) Contact clients in relation to their course booking (course details, pre-course information, invoicing etc.)
- b) Attribute qualification credit to learners via ITC
- c) Produce commemorative certificates via ITC
- d) Produce CPD and course attendance certificates
- e) Receive information pertinent to qualifications and training courses (notification of expiry, upcoming course dates)
- f) Enable FATplus to contact you at your request and answer queries

FATplus only uses data for the legitimate and contractual purposes as described above. Any changes to the ways in which FATplus uses individual's data will be communicated to those individuals affected. FATplus will never pass on or sell your data to any third party.

6. How long is data retained?

- **Legitimate data** = FATplus is contractually obligated to retain assessment evidence of any course delivered that is accredited and certificated through ITC (Course Register and Course Assessment Sheet). These documents are scanned and stored electronically on password protected FATplus computer system (office based) in accordance with ITC retention periods, currently 5 years from the date of awarding (certificate date). Following the 5 year period all electronic records are deleted. FATplus does not retain any other personal data collected on learner registration form.
- **Contractual data** = Once a client has entered into a contract with FATplus the following email correspondence pertaining to this contract is retained for reference, currently 5 years from the date of awarding (certificate date): confirmation of costs and details regarding the contract; confirmation of contract and pre-course information for learners; any follow up emails as deemed necessary by FATplus. Following the 5 year period all electronic records are deleted. FATplus does not retain any other personal data collected on learner registration form.

Where invoices are issued to clients, FATplus will also collect the following data for this purpose: Company Name, Address, Town, Country, Postcode. This data is retained in FATplus secure cloud based financial software and will be held indefinitely unless a specific request by clients is made to be removed as a client.

7. What rights you have over your data

Under the GDPR individuals have rights associated with their data, described below:

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Rights in relation to automated decision making and profiling

8. How can FATplus clients request access to their data?

All subject access requests in relation to individual rights above must be made in writing and sent either electronically to andrea@firstaidtrainingplus.co.uk or by post to First Aid Training plus, 7 Tinkerfield, Preston, Lancashire PR2 9RT.

FATplus will acknowledge all subject access requests within 5 working days and will process and respond to all subject access requests within 1 calendar month of receiving suitable identification, as per obligations under the GDPR.

Subject access requests will only be fulfilled when the individual has provided suitable identification (photographic e.g. passport, driving license or other suitable ID). All requests will be securely stored for 5 years unless the request for erasure is requested.

You can also view a simplified version of this document by accessing our Privacy Notice online at www.firstaidtrainingplus.co.uk, by email enquiry to andrea@firstaidtrainingplus.co.uk or request to see a paper version on the day of a course you are attending by speaking to the trainer(s).