

## **DATA PROTECTION POLICY (GDPR COMPLIANT)**

### **Policy Statement**

This policy applies to the processing of personal data in manual and electronic records kept by Beverley Bell Training Ltd., in connection with its learner and human resources (HR) function, as described below. It also covers the company's response to any data breach and other rights under the General Data Protection Regulation. The policy applies to the personal data of any person about whom Beverley Bell Training Ltd. holds or processes data - including, but not limited to: job applicants, existing and former employees, learners, volunteers, placement students, workers and self-employed contractors. People about whom personal data is generated, or processed, are referred to in this policy as 'relevant individuals'.

'Personal data' is information that relates to an identifiable person who can be directly, or indirectly, identified from that information. For example, a person's name, identification number, location, online identifier. It can also include pseudonymised data.

'Special categories of personal data' is that which relates to an individual's health, private sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

'Criminal offence data' is that which relates to an individual's criminal convictions and offences.

'Data processing' is any operation, or set of operations, which is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Beverley Bell Training Ltd. makes a commitment to ensuring that personal data, including special categories of personal data and criminal offence data (where appropriate) is processed in line with GDPR and domestic laws and all its employees conduct themselves in line with this, and other related, policies. Where third parties process data on behalf of the company, Beverley Bell Training Ltd. will ensure that the third party also has robust procedures, in line with those of Beverley Bell Training Ltd., in place. In line with GDPR, Beverley Bell Training Ltd. understands that it will be accountable for the processing, management and regulation, and storage and retention of all personal data held in the form of manual records and on computers and electronic device such as electronic tablets.

### **Types of Data Held**

Personal data is kept in HR files or within our systems. The following types of data may be held by the company, as appropriate, on relevant individuals:

- Full name, home address, phone numbers, email address – (for individual and next of kin).
- CVs and other information gathered during recruitment.
- References from former employers.
- National Insurance numbers.
- Job title, job descriptions and pay grades.
- Conduct issues such as letters of concern or records of disciplinary proceedings.
- Holiday records.
- Internal performance information.
- Medical or health information.
- Sickness absence records.

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- Tax codes.
- Terms and conditions of employment.
- Learner registrations & assessment/examination detail.
- Training details.
- Employer (training requirement).
- Bank/payment details (training requirement).

### Data Protection Principles

All personal data obtained and held by Beverley Bell Training Ltd. will be:

- Processed fairly, lawfully and in a transparent manner.
- Collected for specific, explicit, and legitimate purposes.
- Relevant and limited to what is necessary for the purposes of processing.
- As far as possible, kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay. It is the responsibility of the 'relevant individual' to notify the company of changes to key information such as: change of address; change of name etc.
- Not be kept for longer than 60 months if necessary for its given purpose.
- Processed in a manner that ensures appropriate security of personal data including; protection against unauthorised and/or unlawful processing, accidental loss, destruction and/or; damage by using appropriate technical and/or organisation measures.
- Comply with the relevant GDPR procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- The right to be informed.
- The right of access.
- The right for any inaccuracies to be corrected (rectification).
- The right to have information deleted (erasure).
- The right to restrict the processing of the data.
- The right to portability.
- The right to object to the inclusion of any information.
- The right to regulate any automated decision-making and profiling of personal data.

### Access to Data

Relevant individuals have a right to be informed whether Beverley Bell Training Ltd. processes personal data relating to them and to access that data. Relevant individuals should put any requests in writing and submit them to the senior management either by first class post or by email.

Relevant individuals must inform Beverley Bell Training Ltd. immediately if they believe that data is inaccurate - either as a result of a subject access request, or otherwise. Beverley Bell Training Ltd. will take all appropriate steps to correct the information.

### Data Disclosures

Beverley Bell Training Ltd. may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- Any employee benefits operated by third parties.
- Disabled individuals - whether any reasonable adjustments and/or special arrangements are required to assist them at work.

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- Individuals' health data - to comply with health and safety or occupational health obligations for the benefit of the employee.
- For the purposes of Statutory Sick Pay.
- HR management and administration.
- The operation of any employee insurance policies or pension plans.
- Learner assessment/examination details.
- Compliance with any regulatory regime to which Beverley Bell Consulting Ltd. is subject.

These types of disclosures will only be made when strictly necessary.

### **Breach Notification**

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner within 72 hours of Beverley Bell Training Ltd. becoming aware of it.

Individuals will be informed directly, in the event that the breach is likely to result in a high risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, Beverley Bell Training Ltd. will do so without undue delay.

### **Training**

All (including new) employees and consultant associates (including new) must read and understand the policies on data protection as part of their induction.

***Beverley Bell Training Ltd. reserves the right to amend and update this Policy at any time. If a change is made, it will be communicated, in writing, to all relevant parties and staff.***