

Upkeep Training – GDPR Policy

In order to comply with General Data Protection Regulation (GDPR) 2018 information must be:

- Fairly and lawfully processed
- Processed for specified purposes
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Not kept for longer than is necessary
- Processed in line with individuals' rights
- Secure

Upkeep Training's 'privacy by design' principle

Contact details for customers are only held on mailing lists where permission has been granted (opt in).

On each marketing mailing (email or postal) recipients are offered the opportunity to unsubscribe from lists or to update/amend personal data.

Data retention and information security

Information is stored electronically on password protected Google Drive, on encrypted (password protected) Excel files and in mailing software (for example 'Mailchimp').

Hard copies (paper based) of customer information are stored securely in Upkeep Offices.

Dates of GDPR compliant data protection awareness training

Date	Who	Title
15/3/18	Rich Powell	East Northamptonshire Council Business Hub - GDPR: Managing Risk and Data Handling

Processes to identify, report, manage, and resolve any personal data breaches

Any loss of data (paper based or electronic) should be reported to Upkeep's Managing Director and Business Development Manager.

Processing of personal data

Personal data can only be processed and stored:

- For equal opportunities monitoring
- For exam candidate identification

As required by ABBE (the Awarding Body for the Built Environment).

- To communicate information to delegates attending training courses
- To monitor course feedback
- As part of a learner record in order to evidence attendance on a course
- To record examination results

Subject Access Requests

Subject Access Requests should be made via email to info@upkeeptraining.co.uk

Stating:

- The reason for the request
- The information required

Upkeep Training reserve the right to check the validity of a request before processing a Subject Access Request.

Dispose of personal data that is no longer required

Record type	Reason for retaining	Format (s)	Disposal
Equal opportunities monitoring	Exam board requirement	Paper based	1 year
		Electronic	2 years
For exam candidate identification	Exam board requirement	Paper based	5 years
		Electronic	5 years
Learner records	To evidence attendance on a course and record exam results	Paper based	2 years
		Electronic	5 years
Course feedback	To monitor performance and customer satisfaction	Paper based	1 year
	Marketing	Electronic	2 years
	Account management		

Course Booking forms	Invoicing	Paper based	3 years
	Marketing Account management	Electronic	5 years

Additional information

Examples of types of information	Details
Exam Entry	<p>As a training provider we hold information relating to delegates that have attended our courses in order to track their progress towards full qualifications and certification.</p> <p>The information held comprises name, job title, organisation, email address and phone number.</p> <p>Our Exam board (ABBE) requires us to ask exam candidates to provide optional information for Equal Opportunities Monitoring - gender, learning/physical disabilities, ethnic origin.</p> <p>For candidate identification purposes we are required to also record date of birth.</p>
Course joining instructions	<p>Data may be used operationally to inform delegates about course details (e.g. joining instructions) via email post, or phone.</p> <p>Course delegates are asked if they wish to be contacted for future marketing purposes using an Opt-in tick box on a training course feedback form.</p> <p>This data may be used for account management purposes.</p>

The Data Protection Act 1998 already requires every data controller (inc. SMEs and sole traders) who is processing personal information to register with the ICO, unless they are exempt.

A quick self assessment is available at:

<https://ico.org.uk/for-organisations/register/self-assessment/>

SUBJECT ACCESS REQUEST FORM

You should complete this form if you want us to supply you with a copy of any personal data we hold about you.

You are currently entitled to receive this information under the Data Protection Act 1998 (DPA) and will continue to be under the EU General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018.

We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

We will endeavour to respond promptly and in any event within one month of the latest of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.

SECTION 1: Details of the person requesting information

Full name:

Address:

Contact telephone number:

Email address:

SECTION 2:

Are you the data subject? Please tick the appropriate box and read the instructions which follow it.

YES: I am the data subject. I enclose proof of my identity (see below). (please go to section 4)

NO: I am acting on behalf of the data subject. I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity (see below). (please go to section 3)

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one of both of the following:

1) Proof of Identity Passport, photo driving licence, national identity card, birth certificate.

2) Proof of Address Utility bill, bank statement, credit card statement (no more than 3 months old); current driving licence; current TV licence; local authority tax bill, HMRC tax document (no more than 1 year old).

If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

SECTION 3 Details of the data subject (if different from section 1)

Full name:

Address:

Contact telephone number:

Email address:

SECTION 4: What information are you seeking? Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.

Please note that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with section 8(2) of the DPA, not to provide you with copies of information requested if to do so would take “disproportionate effort”, or in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be “manifestly unfounded or excessive”. However we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

SECTION 5: Information about the collection and processing of data If you want information about any of the following, please tick the boxes:

- Why we are processing your personal data
- To whom your personal data are disclosed
- The source of your personal data

SECTION 7: Declaration Please note that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to UpkeepTraining is true.

I understand that it is necessary for Upkeep Training to confirm my / the data subject's identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

Signed..... Date

Documents which must accompany this application:

- Evidence of your identity (see section 2)
- Evidence of the data subject's identity (if different from above)
- Authorisation from the data subject to act on their behalf (if applicable)

Please return the completed form to:

Upkeep Training, Jubilee House, 32 Duncan Close, Moulton Park, Northampton. NN3 6WL

Email: info@upkeeptraining.co.uk

Correcting Information

- If after you have received the information you have requested you believe that:
- the information is inaccurate or out of date; or

- we should no longer be holding that information; or
- we are using your information for a purpose of which you were unaware;
- we may have passed inaccurate information about you to someone else;

then you should notify our Data Protection Officer at once.

Issued - April 2018

Review Date – March 2019