



**A14 Training Services Ltd
in association with A14 East Anglia Ltd**

GDPR Privacy Policy

1. Introduction

- 1.1 A14 Training Services Ltd in association with A14 East Anglia Ltd (“A14”) has created this document to demonstrate its commitment to data privacy and its alignment to the requirements of the Data Protection Act 1998 and, in substitution from 25 May 2018, the General Data Protection Regulation 2018 (“GDPR”) in respect of handling and processing personal data.
- 1.2 A14 is registered with the UK Information Commissioner’s Office as a Data Controller and Data Processor.

2. Data received

- 2.1 We (or our third party sub-contractors acting on our behalf of A14) will collect and process data that is provided to us by clients/customers. Personal data may be included in the data you provide about students, learners, tutors, assessors and the supply of goods contacts (“customers”). It is important that contractual arrangements with those individuals clearly set out how we will use their data and with whom it could potentially be shared. We require all our customers to comply with the GDPR and our Fair Processing Policy that is used for specific and individual training services supplied by A14.
- 2.2 By adding individuals’ personal data to A14’s systems, or by sending personal data via email or by other methods to A14, you give consent to us processing the data and you confirm that you have obtained the appropriate consent from the relevant individuals for the personal data to be processed by A14.
- 2.3 A14 will retain this data for the legitimate processing of the contract while you remain an A14 customer and thereafter where the Law/contract reasons require it.
- 2.4 We will use client/customer contact personal data for the purpose of services provided, once the contract has been successful this data will be held securely on our systems for the duration of the contract or for a longer period as determined by our agreement with a third party (see our Fair Processing Notice) or as legislation requires.
- 2.5 We will review client/customer data annually and delete those over 12 months old unless third party or legislation require a longer period. For some training services this is 6 years.

3. Individual Data

- 3.1 You as a commercial company may provide us with personal data about students/learners when you add student/learners’ details to courses, work-based learning awards or exams. The personal data is usually limited to the details required for us to undertake the basic functions of a training provider and the certification process.

- 3.2 These details may but not limited to include a learner’s name, date of birth, gender and qualification awarded. For certain qualifications, such as those within the Road Haulage Industry, data held will include photo images and signatures, driving licences in line with the Awarding Bodies which include but not limited to JAUPT, OCR, DVLA, DSA, Highfield, Driver CPC 4U etc.
- 3.3 In line with our regulatory requirements and requirements to deliver future services such as certificate reprints and the confirmation of awards, this basic customer student/learner-level data will be held by A14 as required by Third Party contracts and legal requirements.
- 3.4 Information processed as part of a learner’s qualification, such as physical exam papers, will be held for a maximum of 1 year. Any personal data captured as part of a training/assessment visit (such as video or photo evidence) will be used for the purpose and outcomes of the visit, and then destroyed after 1 year or retained longer if a requirement by an awarding body.
- 3.5 Individual students/learners may also contact A14 to request certificate replacements. In these circumstances, a record of a learner’s address is taken so that the certificate can be sent. This is held on file for a maximum of 6 months before it is destroyed or deleted unless it is required by an awarding body to be kept longer as in Para 2.5.
- 3.6 As an individual you may provide us with information about a third party contacts who will administer the activities associated with A14 on behalf of the centre. These details may include:
- names, email addresses, telephone numbers, billing information.
 - information about other personnel and contacts for A14 provision of services or goods supply.

For example, organisational charts, IT passwords, health and safety and other policies that may include personal data.

It is important that you seek permission from the individual/customer contacts if you provide their personal data to us. We may use the contact’s personal data for the functions described in the A14 Centre Agreement, IT maintenance agreements which include but not limited to:

- communicating activities between the centre and the Awarding Body. For example, to inform the centre of course or exam results and to send certificates.
- identifying relevant people with whom we should communicate in order to organise and undertake external quality visits.
- communicating regulatory changes and updates, and, if permitted, marketing A14’s products or services.
- Purchasing and the delivery of goods and products, IT servicing maintenance and remote links for repairs.

4. Tutors/Instructors, assessors and internal quality assurance (IQA) staff

- 4.1 Tutors/Instructors, assessors and quality assurance staff provide A14 with information about their experience and qualifications that confirm their ability to teach A14 qualifications and training programmes. As such, A14 may hold a substantial set of personal details about a tutor/instructor, assessor or other staff. These may include:

- names, email addresses, telephone numbers and other contact information
- teaching and training qualification certificates
- proof of professional qualifications
- employment history and training experience
- references

This data is required for regulatory purposes to ensure that we meet the necessary conditions of the Awarding Bodies as described in Para 3.2 and 3.3.

This data remains on A14's systems for as long as the individuals continue to be a tutor/instructor, assessor or IQA for A14. If a tutor/instructor, assessor or IQA requires their personal data to be removed from A14's systems because they are no longer fulfilling the role, they need to inform A14 so that relevant data can be removed from the systems.

5. Data sharing

Other than as set out in the next paragraph, we will never distribute or share personal data that is held on our system with any third parties other than A14's employees, consultants and sub-contractors.

- 5.1 We may share personal data with regulatory bodies (see Para 3.2) in respect of qualifications:
- student/learners' details, including photo ID and signatures
 - investigations or audits carried out by regulatory bodies
- 5.2 A14 has a number of suppliers of services where personal data is shared including but not limited to:
- on-screen assessment provider used for Functional Skills assessments and Etesting
 - pension provider for the administration of the corporate pension scheme
 - database hosting supplier for the hosting of our databases
- 5.3 We have carried out a comprehensive review of their activities in relation to the GDPR and retain a copy of their privacy policy.
- 5.4 Further information regarding specific companies can be provided on request.
- 5.5 A14 provides a certificate verification service that allows members of the public to check that a certificate presented to them is valid and has been produced by A14. The contact address for this service is 2-10 Carver Way Harleston Industrial Estate, Harleston Norfolk IP20 9LT or Telephone 01379 854486

6. Marketing

- 6.1 A14 maintains a marketing database that contains the basic details of individuals who have consented to A14 sending information about products, qualifications, events or services, as well as general news about the A14 companies to them via email.
- 6.2 Each marketing email that is sent provides you with the ability to unsubscribe from receiving marketing emails at any time. Alternatively, you can opt out by sending a request specifying your new choice to info@a14ts.co.uk.
- 6.3 We will at times contact you by email with important communications which we believe will be of legitimate interest to you regarding new products and qualifications, training programmes and dates which you will be able to unsubscribe to should you wish.
- 6.4 Our website uses cookie information to distinguish you from other users of our website. A cookie is typically a piece of information or code that transfers to and from the website. A14 use cookies to record information about your visit including pages visited and documents downloaded, no personal information is obtained.
- 6.5 Most web browsers will accept cookies and you have the option to prevent that, but in doing so you may not be able to take full advantage of the website. If you choose to do this, you may not be able to use certain features on our site, in which case please do call us on 01379 854486 or e-mail us at info@a14ea.co.uk and we will deal with your enquiry personally.

7. External Consultants, Sub-contract tutors/instructors, Exam Markers, Suppliers

- 7.1 A14 engages the services of external freelance consultants sub-contractors and suppliers for various purposes within the company. It is necessary to obtain and retain personal data for the fulfilment of contracts. Data including but not limited to: names, addresses, contact details, professional qualifications, identification documents, bank details – will be held on A14 Systems and Finance Software.
- 7.2 Contracts are reviewed annually, and inactive partnerships deleted from systems. It is necessary to share bank details with our bankers to make payments for services, A14 will always make sure that the details are only processed using secure banking systems. A14 will never share this information elsewhere, outside of the company unless required to do so by a regulatory or legal authority.

8. Employees

- 8.1 A14 will only process and hold staff data for the legitimate purpose of employment. Personal data including name, address, contact details, NI number, date of birth, bank details, employment history, medical history, next of kin contact details is stored and processed on the A14 secure Management drive and 12Pay payroll system and will be held for the duration of the employment.
- 8.2 On leaving the company all data will be removed from systems and personnel files and be archived for a period of 6 years before being securely destroyed. PAYE information will be held on payroll for 6 years after as required by HMRC.
- 8.3 CVs and interview notes will be held for 1 year after the recruitment of a role before being securely destroyed or deleted. Data for successful candidates will be stored with employment data.
- 8.4 Prospective CVs will be considered on receipt, shared with internal departments and destroyed should no suitable vacancies be available. A14 does not store prospective CVs. References will be requested from former employers as part of employment terms. Factual references for former staff will only be provided on request from future employers, A14 will only state dates of employment and final role. On receipt of financial reference requests, Management staff will seek consent before providing information.
- 8.5 Personal data will be shared with relevant agencies for the appropriate performance of their work role, pensions schemes, tax affairs, benefit schemes, insurances, fleet management, illness cover. Staff participation in such services will indicate consent to share required data for the performance of the service. All staff are aware of A14 TQMS system with Staff Handbook which has a detailed section relevant to personal data relating to the GDPR 2018.

9. Security

- 9.1 A14 has security measures in place to help protect against the loss or misuse of data under our control, whether this be physical or electronic. Offices are only accessible by designated key holders which are on the register of key holders. When unoccupied, the offices are locked and alarmed and all physical data is secure in cupboards or filing cabinets.
- 9.2 All personal data can only be accessed by unique log on to the accounts system and access is limited to authorised personnel related to the company. Passwords are changed when staff leave the company to ensure secure access.

10. Where we store data

- 10.1 All data in A14 is stored within A14's own systems and property and is not out sourced to any external hosting provider
- 10.2 Data is backed up regularly on to encrypted portable media as a method of disaster recovery
- 10.3 A14's email data is stored with Microsoft located in EU data centres and protected by Microsoft's standard security and backup processes.

11. Destruction of physical data

- 11.1 A14 employees are trained to destroy all personal data securely. A14 has contracts in place to have all paperwork containing personal data securely shredded. Certificates are provided to confirm secure shredding.

12. Data breach incidents

- 12.1 In line with our regulatory requirements, A14 has a set of processes for issue and incident management, including data breaches. These processes include the required notifications to be sent to the Information Commissioners Office and to customers. This is reviewed annually and may be subject to change.

Any incidents are recorded in the Complaints/Incidents book which is part of the TQMS process and these are reviewed as part of A14 procedures.

13. The General Data Protection Regulation 2018

- 13.1 A14 has adapted its policies and procedures to ensure it is compliant with the GDPR. A document has been produced and is displayed in prominent areas to represent our current status and will be reviewed annually and updated as processes are developed. Under the GDPR, individuals have certain rights when it comes to the control of personal data. The Policy document may be requested from the Data Controller and there is a full print out available in the main office area.

14. The right to be informed.

- 14.1 Each individual has the right to be given information about how their data is being processed and why. A14 has provided this policy and where required for certain specific training courses a Fair Processing Policy which is explained on each course to show how we handle your data.

15. The right of access.

15.1 A14 has a legal duty to comply with the requirements of Subject Access Requests (SAR)

16. The right to rectification.

16.1 The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete.

17. The right to be forgotten.

17.1 You have the right to ask A14 to remove your data under GDPR.

18. The right to restrict processing.

18.1 You may restrict processing of your data for a legitimate reason. We would still retain the right to hold that information as described in previous paragraphs relating to legal requirements

19. The right to data portability.

19.1 You have right in certain circumstances to be able to obtain the information we hold about you and use it for your own purposes. Conditions apply.

19.2 Should you wish to exercise any of your rights above, please email data.controller@al4ea.co.uk stating the following information:

Name
Contact details
Relationship to Subject
Full details of information relating to your request
Reason for request and the right being exercised

You will be asked to verify your identity if you are the subject, alternatively you will be asked to provide consent from the subject if you are a representative. Should we require further information we will contact you. Your request will be dealt with within 1 month of receipt of your request.

19.3 A14 does not at present use automated profiling. Should any automated processes be implemented, the policy will be reviewed and updated.