

Wallace School of Transport

DATA PROTECTION POLICY

Version	Date Last Update	Updated By	Amendments Made
1	January 2000	Hylon Smith	Creation
2	October 2009	Hylon Smith	Rewording whole policy
3	January 2015	Hylon Smith	Update of earlier version
4	October 2019	Ruth Wallace	Rewording Document to template

WST expect all staff, instructors, learners and visitors gain an understanding of and to adhere to this policy when involved in WST activities. This policy can be accessed through our website at all times. It is updated annually or as and when required by changes in the law or updates from our accrediting body.

Any queries or questions regarding this policy should be addressed to our Quality Advisor whose contact details are on our website.

Introduction

WST is fully committed to compliance with the requirements of the Data Protection Act 1998 and DGPR legislation.

This Policy sets out what data will be retained and how this data will be managed and we confirm that we fully ensure principles of the act which states that personal data is:

- processed fairly and lawfully;
- processed only for specific purposes;
- adequate, relevant and not excessive;
- accurate and kept up to date;
- kept for no longer than is necessary;
- kept in accordance with your rights; and
- kept securely and not transferred outside the European Economic Area unless an adequate level of protection for your rights is in place.

To operate effectively WST has to collect personal or sensitive personal data relating to recruitment and employment of staff, instructors as well as some supplier and learner information to facilitate delivery of training. These are the reasons why we keep and process data:

- considering suitability for recruitment;
- administration of all relevant paperwork;
- information relevant to the qualification;

- compliance with legal requirements;
- performance monitoring;
- absence management;
- establishing training and/or development requirements;
- establishing a contact point in an emergency.

WST data is stored in controlled servers with limited access. Data is stored and processed in the UK. We do not transfer data outside the UK. WST website does not target, or intend to attract children under the age of 14. WST does not knowingly solicit personal information from children under the age of 14 or send them requests for personal information.

WST commits that:

Personal data will only be processed in line with established regulations and will be stored safely and securely and not disclosed to any third party unlawfully.

Maintain personal data for only the time period as set out in the Privacy Documentation Policy available on our website.

Only releasing personal data to authorised individuals / parties and will not do so unless permission is given.

Collecting relevant and accurate data only for specified lawful purposes

Adherence to regulations and related procedures to ensure all staff and instructors who have access to personal data held by WST are fully aware and abide by their duties under the Data Protection Act 1998 and GDPR legislation.

Only share learner information with outside authorities to support booking and arranging tests and exams (and will only provide the information they need to facilitate those arrangements as they are prohibited from using that information for any other purpose).

WST will disclose learners personal information if required to do so by law in urgent circumstances to protect personal safety, the public or our website.

WST full Privacy Policy is detailed on our website.

Right to information

Staff, instructors and learners can request access to information that WST holds whether that be on paper or in computer records. Upon receipt of request WST will have up to 10 working days to respond to this request.

Should any a member of staff, a learner or instructor feel they have been denied access to personal information they are entitled to view, or feel information has not

been handled according to the eight principles detailed earlier, then they may contact the Information Commissioners Office at <https://ico.org.uk/>

Data breaches

General Date Projection Regulations (GDPR) rules dictate that any Data breach encountered by any company must be reported to the National Supervisory Authority with 72 hours of occurrence and in some cases communication to individuals whose personal data have been affected by the breach. WST would comply with this rule if we had a Data Breach.

Enforcement of this Policy

Breach of this policy and our Privacy Policy will be treated very seriously and, where appropriate, disciplinary action will be taken against the relevant staff or instructors and managed proportionately to the breach. It should be noted that, in certain circumstances, someone making an unauthorised disclosure of personal data, could be committing a criminal offence.

As agreed by Directors:

Neil R Wallace 

Ruth I Wallace 

1st September 2019