



DATA PROTECTION POLICY

Policy Statement

Tailored Highway Support Ltd is required to maintain certain personal data about its learners and related companies for the purposes of satisfying operational and legal obligations. The company recognises the importance of the correct and lawful treatment of personal data; it maintains confidence in the organisation and provides for successful operations.

The types of personal data that Tailored Highway Support Ltd may require include information about: current, past and prospective learners, suppliers and others whom it communicates. The personal data, whether it be held on paper, on a computer or other media, will be subject to the appropriate legal safeguards as specified in GDPR

Tailored Highway Support Ltd fully endorses and adheres to GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Learners and any others who obtain, handle, process, transport and store personal data for the company must adhere to these principles.

Principles

The principles require that personal data shall:

- Be processed fairly and lawfully and shall not be processed unless its recorded as to where it's been processed too and shared with, whom has access to it and what information is being held.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for that purpose
- Be accurate and, where necessary, kept up to date.
- Not to be kept longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures;
- Be presented to the provider on request within 1 month.
- Be that the provider gives written authorisation for its correct use and storage.

Subject access

All individuals who are the subject of personal data held by the company are entitled to:

- Ask what information the company holds about them and why and have this produced to them within 1 month of the request.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what the company is doing to comply with its obligations under GDPR.

Learners responsibilities

Learners are responsible for:

- Checking that any personal data that they provide to the company is accurate and up to date.
- Informing the company of any changes to information which they have provided, e.g. changes of address.
- Checking any information that the company may send out from time to time, giving details of information that is being kept and processed.
- Ensure that they give the Company authorisation to hold personal data.

If as part of their responsibilities, Learners collect information about other people (e.g. about personal circumstances, or about employees in the company), they must comply with this policy.

Data Controller

Any questions or queries regarding this policy document or how data should be stored on Tailored Highway Support Ltd equipment, should be directed to the data controller.

Gavin Kershaw the company Data Controller.

Contact Email: gavin@thstraining.co.uk

Tel: 0750 606 4430

Tailored Highway Support Ltd only process personal information that is required for the businesses to meet their legal requirements. Therefore, a dedicated Data protection Officer (DPO) is not necessary.

Data handling

Tailored Highway Support Ltd only process third party personal information through the training department.

All information held is recorded by the Training Manager/Coordinator. All information held is recorded to where it has been processed too and shared with, whom has access to it and what information is being held. All personnel data is stored safely and securely and any emailed information is deleted once stored.

Tailored Highway Support Ltd do not share any information with third parties unless it is necessary for Training, its client's requirements, certification and/or candidate registration.

Tailored Highway Support Ltd training centre share learner's information with Highways England for HE Passport scheme, Lantra Awards and the SQA for traffic management and training/assessments for certification and card production. Without sharing this information, employees are not permitted to work on HE and LA sites and it would not allow the operatives and learners to gain competency cards to prove their competence where required.

The information may be sent to clients for clarification of qualification, courses attended or emergency contacts.

Data security and sharing

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely and kept on a record as to whom has access to it and whom it has been shared with.
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised party.
- Data is not shared through automated decision making profiling or third parties for marketing.
- All scanned and emailed personnel data is filed securely then original emails are deleted from files both from the source and destination.

Rights to access the information

Learners and other subjects of personal data held by the company have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems. Any person who wishes to exercise

the right should make the request in writing to the Data Controller and it will be responded to within 1 month.

The learner has the following rights:

1. to be informed;
2. of access;
3. to rectification;
4. to erasure;
5. to restrict processing;
6. to data portability;
7. to object; and
8. Not to be subject to automated decision-making including profiling.

This means that an employee/learner can request, what personal information Tailored Highway Support Ltd holds about you.

Any requests should be directed to the Data Controller.

The only addition to the policy is the "Data Portability"

Data portability means that an learner can request the personal information Tailored Highway Support Ltd holds about them can be given on a memory stick (or other media) to take away. If requested by the individual, it will be provided free of charge.

Any excessive requests can be refused and/or charged for, but the Data Controller must tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. You must do this without undue delay and at the latest, within one month.

Subject consent

The learner/third party must:

- Give their consent for Tailored Highway Support Ltd to hold the information given.
- Complete the relevant form agreeing to the terms and conditions within.
- If an learner/third party does not agree to the terms and conditions then they must report to the Data Controller.

The need to process data for normal purposes has been communicated to all data subjects via this policy. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained. Processing may be necessary to operate company policies, such as health and safety, equal opportunities and/or to gain qualifications such as through Lantra awards and the SQA.

All consent shall be recorded and retained in a secure location within the personnel/training/finance files and department.

International

As a rule Tailored Highway Support Ltd do not share personal data or hold personal data with business outside the UK, so this is not applicable.

If Tailored Highway Support Ltd need to transmit personal data to companies outside the UK, Tailored Highway Support Ltd will only do so if the transfer is made with the individual's informed consent.

Children

Tailored Highway Support Ltd do not process or hold information about children.

Data Breaches

Any breaches shall be reported and investigated by the Data Controller and shall be reported to the holder of that information immediately.

The breach/investigation shall consider and list the following:

- What data has been compromised?
- What information has been taken?
- Has the breach resulted in third party access to data?
- What the implications are?
- Does the data contain personal information?
- Does the incident require the data controller to report the breach to the ICO?
- What necessary actions may need to be taken?
- Data Controller to report breach to ICO if there has been a data breach. (0303 123 1113)

Data Protection by Design and Data Protection Impact Assessments

GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'. It also makes Privacy Impact Assessments (PIAs) – referred to as 'Data Protection Impact Assessments' or DPIAs – mandatory in certain circumstances.

"Whilst a PIA is not a legal requirement the ICO may often ask an organisation whether they have carried out a PIA. It is often the most effective way to demonstrate to the ICO how personal data processing complies with the DPA."

Tailored Highway Support Ltd will ensure that they cover the 'data protection by design' element.

If Tailored Highway Support Ltd was to undertake a project that requires the processing of sensitive information, it will fully take into consideration if it is necessary to perform a PIA.

Examples of this might be:

The wearing of body worn cameras to record assessment criteria.

The database for the software may hold personal information about an employee in addition to their vehicle registration, is the software secure etc.?

Risks to Consider

- Risk to Individuals
- Corporate Risk
- Compliance Risk

Detailed information on when and how a PIA is required can be found in the ICO – PIA code of Practice, which can be found on the ICO website. www.ico.org.uk

Retention of data

The company will keep some forms of information for longer than others. Under the normal circumstances, Personal details should not be retained any longer than 5yrs, however, with Lantra and NHSS skills registration cards, we hold onto Learner data for a minimum of 7yrs. The reason being, in this period of time, it gives the Learner a cycle of training, carded, refresher training before their details are deleted. All staff are responsible for ensuring that information is not kept for longer than necessary.

Signed on behalf of the Company
Gavin Kershaw



Gavin Kershaw

Date: 2nd Feb 2019
Review due: 02/02/2020

Authority Form

Registration Form for Training	
Course Title:	
Surname:	
Forename:	
Address: <small>*Please Note this is the address that any certificates and/or Cards will be sent to if not your employer's address at their request.</small>	
Postcode:	
Telephone Number:	
Company Name:	
Date Of Birth:	
Do you hold the Correct Qualifications for this course and do you feel suitable to undertake it	
Yes	No
Do you require any reasonable adjustments	
Yes	No

I,(name) hereby give my consent that THS Ltd and the Centres its associated with, may collect and store information about me for certification, qualification, candidate registration and candidate qualification confirmation through Lantra Awards and the SQA. The Data Protection Policy for the Training Centre and Qualification body is available on request. No information is shared through a third party other than Lantra Awards and the SQA.

Signature:		Date:	
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If classroom-based courses or assessments are cancelled within 72 working hours of the start time, then a 50% charge will be levied for the course/assessment. If courses/assessments are cancelled within 24 working hours of the start time, then the full cost of the course will be levied.

If assessments are cancelled by our assessors due to unsafe working practices or Training suspended and you are requested to leave the class room due to breeches of the Centre or Qualification Bodies Policies then 100% of the cost will be levied.



Data Location and Access Form

FOR COLLECTION AND RETENTION OF INFORMATION TO BE HELD UNDER THE GENERAL DATA PROTECTION REGULATION

Project Name/Contract No/Customer name/ Supplier Name:

.....

I,(Name) am authorized to declare

We,.....(Company Name) information received

from

Tailored Highway Support Ltd, will processed and stored in in strict compliance with GDPR legislation.

Signed

Position Date

Data Location and Access Form

Name of Holder	Information Stored	Other (specify)	Location of Storage	Date Stored	Access initials
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	
	Choose an item.		Choose an item.	Click here to enter a date.	