

1. **Introduction**

1.1 Xtreme Emergency Training Ltd holds and processes information about Learners, corporate clients, and other data subjects for administrative, approval and commercial purposes. When handling such information, Xtreme Emergency Training Ltd and all staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the Act). In summary these state that personal data shall:

- Be processed fairly and lawfully.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose.
- Be adequate, relevant and not excessive for the purpose.
- Be accurate and up-to-date.
- Not be kept for longer than necessary for the purpose.
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorised processing, accidental loss, damage or destruction.
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

1.2 Definitions

"Staff", "Learners" and "other data subjects" may include past, present and potential members of those groups including other terms such as 'Learner', 'Student', 'Delegate', 'Trainer'. 'Assessor'.

"Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees, approving, awarding and monitoring organisations and bodies etc.

"Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

"ICO" refers to the Information Commissioner's Office; the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

2. **Notification of Data Held**

2.1 Xtreme Emergency Training Ltd shall notify all Staff and Learners and other relevant data subjects of the types of data held and processed by Xtreme Emergency Training Ltd concerning them, and the reasons for which it is processed. The information which is currently held by the Xtreme Emergency Training Ltd and the purposes for which it is processed will be amended when processing for a new or different purpose.

3. **Responsibilities**

3.1 All people in which information is held.

- Ensure that all personal information which they provide to Xtreme Emergency Training Ltd is accurate and up-to-date.
- Inform Xtreme Emergency Training Ltd of any changes to information, for example, changes of address.
- Check the information which Xtreme Emergency Training Ltd shall make available from time to time, in written or automated form, and inform Xtreme Emergency Training Ltd of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. Xtreme Emergency Training Ltd shall not be held responsible for errors of which it has not been informed.

3.2 Staff, other data subjects and third parties shall ensure that

- All personal information is kept securely in accordance with the Act and ICO guidelines / recommendations.
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter and may be considered gross misconduct in some cases.

3.3 When staff supervise Learners doing work which involves the processing of personal information, they must ensure that those students are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

4 *Learner Responsibilities*

4.1 All Learners shall

- Ensure that all personal information which they provide to Xtreme Emergency Training Ltd is accurate and up-to-date.
- Inform Xtreme Emergency Training Ltd of any changes to that information, for example, changes of address.
- Check the information which Xtreme Emergency Training Ltd shall make available from time to time, in written or automated form, and inform Xtreme Emergency Training Ltd of any errors. Xtreme Emergency Training Ltd shall not be held responsible for errors of which it has not been informed.

5 *Rights to Access Information*

5.1 Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects in Xtreme Emergency Training Ltd have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to Xtreme Emergency Training Ltd

5.2 Xtreme Emergency Training Ltd will make a charge of £10 for each official Subject Access Request under the Act.

5.3 Xtreme Emergency Training Ltd aims to comply with requests for access to personal information from Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects, as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Information Security Officer to the data subject making the request.

6 *Subject Consent*

6.1 Xtreme Emergency Training Ltd will ask for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma, arthritis. Xtreme Emergency Training Ltd will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency or in carrying out physical activities.

7 *The Data Controller and the Designated Data Controllers*

7.1 Xtreme Emergency Training Ltd is the data controller under the Act and is ultimately responsible for implementation.

8 *Assessment Marks & Learner Certificates*

8.1 Learners shall be entitled to information about their marks for assessments, however this may take longer than other information to provide.

9 Storage of Data

9.1 Xtreme Emergency Training Ltd is fully compliant under the Act and the ICO for the storage of physical data at our premise, in transit and at 3rd party venues.

9.2 Xtreme Emergency Training Ltd is fully compliant under the Act and the ICO for the storage of electronic data. Data that falls under the remit of the act and requires storage on removable media (including but is no limited to USB drives, removable hard drives, CD disks and storage cards) will be kept to an absolute minimum. When removable media is used, this will be encrypted and password protected. Data subject to the Act is stored within fully secure email systems and cloud-based software.

10 Retention of Data

10.1 Xtreme Emergency Training Ltd and its awarding bodies will keep different types of information for differing lengths of time, depending on legal, awarding or approving body and operational requirements. In compliance with the act, personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes

11 Disposal of Data

11.1 Xtreme Emergency Training Ltd disposes of data in accordance with the ICO Deleting Personal Data document 20140226 Version:1.1. Data is kept no longer than is necessary.

12 Compliance

12.1 Compliance with the act is the responsibility of all Learners and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings.

12.2 Xtreme Emergency Training Ltd is registered with the ICO as an additional measure of compliance. Registration Number ZA109085. Xtreme Emergency Training Ltd uses this registration to keep up to date with the latest developments, recommendations and procedures. Xtreme Emergency Training Ltd ensures that all relevant information changes are communicated to all staff, Learners and other data subjects

12.3 Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with Xtreme Emergency Training Ltd.

Signed:



16/03/2018

Name: James Nicholson

For and on behalf of: Xtreme Emergency Training Ltd

Position: Managing Director