

1. Purpose

- 1.1. The purpose of this policy is to set out the principles to be followed to ensure a consistent and effective approach to managing the protection of data across More Training.

2. Scope

- 2.1. This policy applies to all personal data we process regardless of the location where that personal data is stored (e.g. on an employee's own device) and regardless of the data subject. All staff and others processing personal data on behalf of More Training must read it. A failure to comply with this policy may result in disciplinary action.
- 2.2. All managers are responsible for ensuring that all More Training staff within their area of responsibility comply with this policy and should implement appropriate practices, processes, controls and training to ensure that compliance.
- 2.3. More Training's Data Protection Officer (DPO) is the General Manager.

3. Policy Statement

- 3.1. More Training is responsible for, and must be able to demonstrate compliance with, the principles of the GDPR which require personal data to be:
 - 3.1.1. processed lawfully, fairly and in a transparent manner.
 - 3.1.2. collected only for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.
 - 3.1.3. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
 - 3.1.4. accurate and where necessary kept up to date.
 - 3.1.5. not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data is processed.

- 3.1.6. processed in a manner that ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- 3.2. It is More Training policy to:
 - 3.2.1. Obtain, use, store and otherwise process personal data relating to staff, learners, associates and any other individual in compliance with the requirements of Data Protection Act 2018 and the General Data Protection Regulations 2018.
 - 3.2.2. Hold personal information in a structured way so that retrieval is easy.
 - 3.2.3. Acquaint staff with their duties under the Act and set out our processes for handling personal data and safeguarding individuals' rights and freedoms.
 - 3.2.4. Protect More Training from risks of personal data breaches and other breaches of data protection law.
- 3.3. Failure to adhere to this policy will be addressed by necessary disciplinary actions in accordance with More Training's Staff Disciplinary Procedures, Student Disciplinary Procedures and relevant contractor and third-party contractual clauses.

4. Accountability

- 4.1. More Training will implement appropriate technical and organisational measures in an effective manner to ensure compliance with data protection principles and must be able to demonstrate such compliance.
- 4.2. We must therefore apply adequate resources and controls to ensure and to document GDPR compliance including:
 - 4.2.1. appointing a suitably qualified DPO;
 - 4.2.2. integrating data protection into our policies and procedures, in the way personal data is handled by us and by producing required documentation such as Privacy Notices, Records of Processing and records of Personal Data Breaches;

- 4.2.3. training staff on compliance with Data Protection Law and keeping a record accordingly; and
- 4.2.4. regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

5. Responsibilities

- 5.1. Data Controller: As the Data Controller, More Training is responsible for establishing policies and procedures in order to comply with data protection law.
- 5.2. Data Protection Officer (General Manager) is responsible for:
 - 5.2.1. advising More Training senior management team and staff of its obligations under GDPR.
 - 5.2.2. monitoring compliance with this Regulation and other relevant data protection law and monitoring training and audit activities relate to GDPR compliance.
 - 5.2.3. to provide advice where requested on data protection impact assessments.
 - 5.2.4. to cooperate with and act as the contact point for the Information Commissioner's Office.
- 5.3. Staff and Associates who process personal data about learners, staff, or any other individual must comply with the requirements of this policy. Staff members must ensure that:
 - 5.3.1. all personal data is kept securely;
 - 5.3.2. no personal data is disclosed either verbally or in writing, accidentally or otherwise, to any unauthorised third party;
 - 5.3.3. personal data is kept in accordance with More Training's retention schedule;

- 5.3.4. any queries regarding data protection, including subject access requests and complaints, are promptly directed to the DPO;
- 5.3.5. any data protection breaches are swiftly brought to the attention of the Data Protection Officer;
- 5.3.6. where there is uncertainty around a data protection matter advice is sought from the Data Protection Officer;

6. Learners are responsible for:

- 6.1. familiarising themselves with the Privacy Notice provided when they enrol with More Training;
- 6.2. ensuring that their personal data provided to More Training is accurate and up to date.

7. **Changes to this policy**

- 7.1. We reserve the right to change this policy at any time without notice to you so please check regularly to obtain the latest copy.

Unless there are any changes this policy will be reviewed annually at the end of the academic year (1st Aug – 31st Jul) by the Owner.