



# Information Management And Privacy Policy

Jill Webb Training (JWT) is committed to the principles of Information Governance and Compliance with the General Data Protection Regulations (2018).

The principles of information governance are concerned with the management of information in an organisation. Information governance balances the use and security of information. It helps with legal compliance and operational transparency. An organisation can establish a framework for those working on behalf of the company to handle information through their information governance policies and procedures.

Information governance incorporates: records management, information security and protection, risk management, privacy, data storage and archiving and knowledge management.

For JWT, this means that we make every effort to rigorously adhere with the requirements of the General Data Protection Regulations (GDPR) and UK Data Protection Law.

Any associates working on behalf of JWT are required to comply with the terms of this policy.

## 1. What is GDPR?

The General Data Protection Regulation (GDPR) is the European data protection framework.

## 2. How does it affect Jill Webb Training?

The GDPR is based on the core principles of data protection. In adhering to these principles JWT is committed to:

- collect no more data than is necessary from an individual for the purpose for which it will be used
- obtain personal data fairly from the individual by giving them notice of the collection and its specific purpose
- retain the data for no longer than is necessary for that specified purpose
- keep data safe and secure; and
- provide an individual with a copy of his or her personal data if they request it



## Information Management And Privacy Policy - Continued

### 3. What does this mean in practice for clients who work with Jill Webb Training?

- We will only ask you for the relevant data required to run a course
- This data will then be processed in accordance with the law
- This data will be kept safe
- This data will be destroyed when it is no longer needed. Details of the data retention schedule are shown in Appendix A
- At any time, you can request that we destroy any data held on you. We would make you aware if destroying this data could have a detrimental effect on you, for example the inability to send out a certificate following a course
- If we hold your details, we will contact you three or four times a year with information on forthcoming training opportunities. You can opt out at any time. Any marketing campaign follows the good practice guidance issued by the Information Commissioners Office.
- Emails containing factual information needed to access a course are, in law, 'service messages' and are exempt from this policy and GDPR legislation. We also retain the right to contact you if you owe JWT money
- Very occasionally, we may need to pass your information onto someone else for your own welfare. For example, if you are taken ill on a course, or disclose something which makes us concerned that you are at risk or pose a risk to others. When we can, we will advise you that we need to do this

### 4. Privacy Statement

The principles of this policy are embedded in the following Privacy Statement:

*Jill Webb Training is committed to protecting your personal data and privacy. We recognise that ensuring the accuracy and security of your personal data is essential to retaining your confidence and trust. The information you provide to us will only be used for the purposes that you provide it and will never be used for third party marketing. Full details of how we manage any information we hold about you can be found in the Jill Webb Training Information Management and Privacy Policy.*

When we collect your personal data we will normally tell you:

- what your information will be used for
- who it may be shared with
- where you have a choice about your data we will ask for your consent to use it



## Information Management And Privacy Policy - Continued

### 5. Your rights under the GDPR

Under the provisions of the GDPR, you have the right to:

- Request details about the information we hold on you
- Request that we rectify any mistakes
- 'To be forgotten' – to have your data completely deleted from our systems
- Prevent your personal data being processed

### 6. How do we store your information?

- Information is stored electronically on a passworded computer. The backup system is by use of an external hard drive which is stored securely
- All computer systems are virus checked on an on-going basis
- Some information pertaining to accredited courses is kept on the shared Google Drive for JWT. This data is subject to the same rigorous controls as all other data held by JWT. Access to the Google Drive is by password and is limited to personnel who have a reason to need to use the drive. Please be aware that Google may hold this information outside the EU
- Occasionally we have to hold data in hard copy, eg if you have completed a registration form, this is held until it is transferred to electronic storage. Care is taken at all times to keep this as securely as possible. Hard copy records are destroyed by shredding, once they have been transferred to electronic storage in line with the permissions given by you
- If you visit our website we only collect your information with your specific consent, our company policy is to not take any action with IP addresses
- The secure service Mailchimp is used to manage our termly mailings. All protocols linked to this software are followed, and in line with best practice, individuals may unsubscribe at any time

### 7. What do we do if there is a data breach?

Jill Webb Training is registered with the Information Commissioners Office, and full details of this can be found at [www.jillwebbtraining.co.uk](http://www.jillwebbtraining.co.uk).

If security is breached, we will report this to the Information Commissioners Office within 48 hours. We will inform clients as soon as possible about what has happened and what steps we have taken to rectify the situation.



## Information Management And Privacy Policy – Continued

### 8. How do we respond to subject access requests?

We respond to subject access requests by following the most up to date guidance published by the Information Commissioners Office. Should any requests for data be considered vexatious, we will notify the Information Commissioners Office. ([www.ico.org.uk](http://www.ico.org.uk)). Jill Webb Training is registered with the ICO.

*This policy will be reviewed every year or earlier if a change in legislation, working practices or feedback from clients or partners necessitates.*

*This policy was reviewed and updated in August 2023 and no formal issues had been received.*



## Appendix A

### Record Retention Schedule

Data Collected	How Long Kept For	Rationale
Candidate details for accredited courses (ITC, Qualsafe and NUCO)	JWT retains this data for the minimum time needed until it is uploaded on the awarding body website – usually a maximum of a month	This minimises the risk of a data breach while information is held locally
Candidate details for certified courses (CPD)	5 years	This covers the duration of any certificate with a renewal date and allows for queries after this date
Information to raise invoices and invoice details	7 years	In line with the requirement to hold all accounting paperwork for 7 years (HMRC)
Data collected for marketing purposes – this is in response to a specific question asking if we can retain data for this purpose	Indefinitely	Every mailing gives the individual or company the option to opt out
Recognisable data held in the Zoom software – namely the downloaded Zoom ‘chat’	One month	The chat in Zoom is autosaved after each course or meeting. Any reasonable query which needed the chat would arise within this time span
Ad hoc data collection	Decided on a case by cases basis	For example, if you gave your name and contact details in order for a certificate to be sent to you, this information will be kept until you have received the certificate unless you gave permission for us to keep it longer