



Vocational and Work Based Training Specialists

www.ttcompany.co.uk

Confidentiality Policy and Data Security Plan/Privacy Notice

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TT Training and Consultancy Company Ltd recognises it’s duties under the General Data Protection Regulations 2018 and Data Protection Act 2018. A Privacy Notice is attached in the appendices of this policy.

TT Training and Consultancy Company Ltd has registered as a Data Controller with ICO and this is renewed annually. The registered Data Processor is: Tracey Twist

We make the following pledge with regard to handling data and adhering to the Data Protection Act 2018:

- All data that is held (paper or electronic) will be stored securely. All computers and laptops are password protected to ensure limited access
- The directors of the company and centre administrator can access information about all learners, staff, volunteers and partner agencies to ensure the smooth running of the organisation
- IQAs, Trainers and Assessors can access limited information about learners enrolled on courses and this is limited to: name, email, portfolio evidence and course enrolled on.
- IQAs, Trainers and Assessors can access information about their own learners including: name, address, email address, portfolio evidence, date of birth, telephone number and specific learner needs declared on the registration form.
- The office doors are kept locked, to ensure security of data
- Personal details of learners and staff are kept on a database, held on a server. This data base is password protected and the server is electronically and physically secured. The database is encrypted for added

security. Personal data of learners will be kept for 3 years following the completion of a course, for quality assurance purposes. Personal details of staff will be kept for 3 years after they leave the company.

- All IT equipment will be regularly monitored and will have the correct levels of security software installed
- If we need to share information with a partner agency, e.g. an awarding body, we will ensure that you are informed of this
- Staff and learners can access any data held about them personally by requesting this via email or in writing and we will respond within 7 days
- A data audit has been completed which shows what data we hold, the rationale, how it is stored and how long it is kept for
- Exam papers will be shredded and then burnt on site. A destruction log will be kept and will be available to awarding bodies, as required.
- A privacy policy is available on the Moodle system

Learners

We discuss confidentiality and its importance at the start of every training course. Learners are expected to keep information shared with them throughout the course, that could be of a sensitive nature, confidential.

Learners must have permission from parents/carers for any work products used that contain information about children. We suggest written permission, so that learners have a written record of the agreement. Templates are available at the end of this policy.

Registration forms have been adapted to include 'opt in' permissions, rather than 'opt out'.

Safeguarding

Where we consider that there is a potential safeguarding situation or we are concerned about a child's or adult's welfare we WILL share information with appropriate authorities or agencies, in accordance with our safeguarding policy. Where appropriate, individuals concerned with this matter will be informed that the information is being shared responsibly. Our Designated Safeguarding Lead is: Tracey Twist 07976560014

The ICO

ICO stands for the *Information Commissioners Office*. Their office upholds any information rights in the interest of the public.

Data Breaches

A data breach is when data is release of secure and private information has been transferred into an unsecured and an untrustworthy environment. For example, a document with learner information on has been left on public transport or the IT system is breached and learner details have been harvested.

Near miss data breach

A near miss is where a set of circumstances could have led to a data breach but the situation was rectified or resolved without a data breach occurring. This could include uploading a document to moodle with personal information on. It may be deleted before anyone else has viewed it, so the data was not breached but there was a near miss.

Responding to a Data Breach or Near Miss from TT Training and Consultancy:

We will take the following action:

- Confirm that there was a data breach no matter whether your data was exposed or not
- If data is stolen or mislaid we will attempt to find the data that was stolen or mislaid
- We will contact those who have had their data breached to inform them of the situation and any actions they need to take, which may include: changing passwords
- Conduct an investigation in to the situation and produce a plan with control measures identified, to prevent it happening again

Responding to a Data Breach or Near Miss from a Learner:

We will take the following action:

- Ensure the learner is aware of the data breach or near data breach
- Ensure the learner is aware of their duty to report any breaches or near misses to their employer/placement

Subject Access Requests

Individuals have the right to know what data we store about them. Any requests for this information should be sent to the contact details below and we will respond within 1 calendar month.

Contact details

Our Registered Office

TT Training and Consultancy Company Ltd
56 – 58 Isaacs Road
Torquay
Devon. TQ2 5NH

01803 897897

info@ttcompany.co.uk

Appendix 1

Privacy Notice for TT Training and Consultancy Company Ltd

As a training service we have a requirement to collect, process and store personal data, to meet the requirements set by awarding organisations or to enable us to ensure the service you receive is appropriate and of high quality. TT Training and Consultancy has registered with the Information Commissioner's Office (ICO) as a Data Controller and we renew this annually. The Data Processor for TT Training and Consultancy is Tracey Twist.

Collecting and Processing

We will collect data using our registration forms. Your name (forename and surname) will be used to generate certificates, either through us or with an awarding body. If you are doing on line learning it will be entered on our Moodle server. Your address will be used to post any certificates or other information. If you are doing on line learning it will be entered on our Moodle server. Your postcode will be used to post any certificates or other information. If you are registering with an awarding body it will be passed to the awarding body. Date of birth will be used to identify you and if you are registering with an awarding body it will be passed to the awarding body. Telephone/mobile will be used for queries or communication regarding training, such as making appointments. Email address will be used for marketing (if you have agreed to this), queries and communication regarding training, such as making appointments. If you are doing on line learning it will be entered on our Moodle server. Ethnicity will be used for legitimate interest to ensure we provide appropriate and inclusive practice. Disability or learning need will be used for legitimate interest to ensure we provide appropriate and inclusive practice.

Storing

We take my responsibilities under General Data Protection Regulation (GDPR) seriously and we will ensure that your data is kept safe and secure. Written records will be stored in a locked filing cabinet and all digital information will be stored on password protected systems. You have a right to access any of the information that I hold on you at any time. I will need to keep finance information for 7 years and information on accidents will need to be kept for 3 years or until you are aged 21 years and 3 months. All information that I do not need to keep will be shredded if it is a paper document or deleted if it is a digital document, including digital photographs. Training information will be kept for 3 years. This includes registration forms, evidence, copies of planning and feedback, copies of certificates and evaluation forms. Information of training completed is kept on a database which is stored on a password protected server. Sharing If I need to share information that I have not got permission to share, I will seek permission for you. The exception to this would be if I was concerned about the welfare of someone and I will only share this information with a relevant professional. If you are registering with an awarding body, through us I will share your name, postcode, date of birth and the course you are doing. If you are training with us your data will be accessible to anyone who is involved in your training, employed by TT Training and Consultancy Company. This includes administrators, assessors, trainers and IQAs. Further information If you have any concerns about the way I collect, process and store information please talk to me or put your concerns in writing. If you want to make a complaint, please follow our complaints procedure. You have the right to complain to the Information Commissioners Officer (ICO) if you feel there has been a data breach or if you feel that I have not resolved the complaint satisfactorily. The contact telephone number for the ICO is 0303 123 1113 and more information can be gained from their website: www.ico.org.uk

Date: 2nd January 2013, 18th June 2015, May 2018, October 2018. July 2019. February 2021. 10th January 2023

Example Permission to Use a Child's Information Form

Settings Address

Date:

Dear xxxxxxxxxxxxxxx

I am writing to you as I am currently studying (Please insert full qualification title) with TT Training and Consultancy company Ltd. As part of my studies, I am encouraged to reflect on my practice, prepare activity plans and complete observations of children. In order for me to use information from your child I need to obtain your permission.

I will ensure that:

- Any photos of children submitted in my portfolio will be anonymised by colouring over any faces
- Children's full names will not be used, and I will use either initials or child A, B etc
- Full dates of birth will not be used but I may need to say the age range your child is in e.g. birth to 1 year 11 months, 2 to 2 years and 11 months or 3 to 5 years
- Other personal data will not be shared such as your child's address or date of birth

You can request to see any information about your child that I have shared as part of my studies, at any time and you can withdraw your consent at any time.

My portfolio of evidence will be assessed by an assessor and Quality Assured by an IQA at TT Training and Consultancy Company Ltd. The company is registered with the Information Commissioners Office and the Data Handler is Tracey Twist. My portfolio may also be seen by an external quality assurer who works for the awarding body.

If you are happy for me to use your child's information, please can you sign the declaration here and return it to me.

Many thanks for your support.

Kind regards,

Your name
Your position

Parent/Carer Declaration

I have read the information regarding the qualification that you are undertaking and the evidence that may be needed for your portfolio.

I consent/do not consent (please delete as appropriate) to my child's information being used.

Child's name:

Parent/s/ or Carer/s name/s:

Signed:

Date:

Example Longitudinal Study Consent Form

Settings Address

Date

Dear xxxxxxxxxxxxxxxx

I am writing to you as I am currently studying (Please insert full qualification title) with TT Training and Consultancy company Ltd. As part of my studies, I am required to complete a Longitudinal Study, which is a 6 week study on a child's development. The aim of the study is for me to be able to observe a child, assess their development and plan appropriate activities. Once the 6 weeks of observing and planning have been completed a then have to reflect on my practice and complete a critical evaluation of the study. I would very much like to share my findings with you at the end of the study and for you to contribute to the evaluation.

In order for me to use information from your child I need to obtain your permission.

I will ensure that:

- Any photos of children submitted in my portfolio will be anonymised by colouring over any faces
- Children's full names will not be used, and I will use either initials or child A, B etc
- Full dates of birth will not be used but I may need to say the age range your child is in e.g. birth to 1 year 11 months, 2 to 2 years and 11 months or 3 to 5 years
- Other personal data will not be shared such as your child's address or date of birth

You can request to see any information about your child that I have shared as part of my studies, at any time and you can withdraw your consent at any time.

My portfolio of evidence with be assessed by as assessor and Quality Assured by an IQA at TT Training and Consultancy Company Ltd. The company is registered with the Information Commissioners Office and the Data Handler is Tracey Twist. My portfolio may also be seen by an external quality assurer who works for the awarding body.

If you are happy for me to use your child's information, please can you sign the declaration here and return it to me.

Many thanks for your support.

Kind regards,

Your name

Your position

Parent/Carer Declaration

I have read the information regarding the qualification that you are undertaking and the evidence that may be needed for your longitudinal study.

I consent/do not consent (please delete as appropriate) to my child's information being used.

I would like to/not like to (please delete as appropriate) participate in the final evaluation.

Child's name:

Parent/s/ or Carer/s name/s:

Signed:

Date:

Reviewed 10th March 2024