

## Data Protection Privacy Notice

*For the purposes of this document:*

*Haswell Training Ltd herein referred to as "the Company."*

*Employees – refers to all workforce; employees, sub-contractors, apprentices.*

*Clients – refers to all customers making use of services provided by Haswell Training Ltd.*

### 1. Purpose

This document sets out the type of information we will collect about employees and clients, why we collect it and what each employee's and client's rights are in relation to this data. This notice should be read in conjunction with the Company's Data Protection Policy.

### 2. Personal data we will collect and why

The table below sets out the type of data we collect from employees and clients and the reason why we do so. The data in bold includes that which is collected routinely from all employees and clients. The remaining data is collected on a personalised basis depending on the nature of the employment and/or training contract.

#### Employees

Data	Reason
<b>Contact information</b> , e.g. address telephone number, email address	In order that we can contact you for reasons relating to your employment, e.g. organisation of work, providing information about your employment and pay.
<b>Bank account and details</b>	In order that we can pay you your salary/invoice.
<b>National insurance number and UTR number</b>	In order that we can process PAYE deductions and report to HMRC, as applicable.
<b>Emergency contact details</b>	In order that we can contact a family member or friend in the event of an emergency relating to the employee/sub-contractor.
<b>Short term health information</b> e.g. fitness for work notes, absence records, accident Reports <sup>(1)</sup>	In order that we can effectively manage absences, process statutory sick pay and ensure employees are fit to return to work. To comply with our statutory accident reporting duties.
<b>Criminal record and DBS disclosures</b> <sup>(2)</sup>	In order to assess an individual's suitability for employment and, where it is a legal requirement to carry out DBS disclosures, comply without our obligation to do so.
<b>Performance and conduct information</b> , e.g. training records and certifications, appraisal and disciplinary records and letters	In order to effectively manage an employee's performance and conduct at work and in order to defend legal proceedings.

<b>Insurance</b> policy number, type/amount of cover and expiry date	In order to ensure that all staff working for the company on a sub-contractual basis have adequate insurance cover.
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<sup>1</sup> This type of data is classified as a special category of data. This means that you must expressly consent to the Company using this data and therefore we will explain the precise reason for collecting it at the time.

<sup>2</sup> Where we carry out a criminal records or DBS disclosure we will use the information received to make our recruitment/employment decision and then destroy the information. We will not keep Criminal Records Information for more than 6 months

## Clients

Data	Reason
<b>Name, address, date of birth, contact address and details</b>	In order that we can contact you for reasons relating to your training and assessment and adequately process your training records for confirmation of achievement.
<b>National insurance number</b>	In order that we can contact you for reasons relating to your training and assessment and adequately process your training records for confirmation of achievement.
<b>Emergency contact details</b>	In order that we can contact a family member or friend in the event of an emergency.
<b>Reasonable adjustments</b>	In order to ensure reasonable adjustments are implemented to support facilitation of learning.
<b>Training course/s undertaken, training log and assessment scores (as applicable)</b>	In order that we can contact you for reasons relating to your training and assessment and adequately process your training records for confirmation of achievement.
<b>Details of organisational training lead</b>	In order to effectively manage organisational training needs, as applicable.

## 3. Storage of information

Employee and client information will be stored:

- In electronic format; and/or
- In hard copy format

Personal data stored in electronic format will be stored within computer or cloud based systems which are password protected. Access to information will be limited to those members of the Company who require access to it in accordance with the reasons set out in section 2 above.

Personal data stored in hard copy will be stored in locked filing cabinet within a locked office with access limited to those members of the Company who require access to it in accordance with the reasons set out in section 2 above.

## 4. Third parties

It may be necessary for the Company to share some employee and client personal data with third parties. Where it does share personal data with a third party the Company will take measures to ensure that:

- the security of the personal data is maintained; and
- that it is not used unlawfully.

Circumstances where personal data may be shared include:

- With training accreditors and/or regulators in order to comply with awarding standards and ensure timely validation of training qualifications.

With a third party payroll or pension provider in order to process wage payments and pension contributions

- With HMRC for PAYE purposes
- With employment law and HR advisors in order to obtain advice in relation to any contractual or legal employee relations issue
- In order to obtain a criminal records or DBS disclosure
- In order to provide employment references
- In order to comply with our statutory reporting duties to HMRC, the Health and Safety Executive etc.

If you consider that any third party has unlawfully used your personal data then you should notify the Company as soon as possible in order that we can investigate the matter and take steps to protect your personal data.

## 5. Updating your personal data

We are required to update personal data to ensure it is accurate and up to date. Therefore if any of your details change then you must notify us promptly of the change.

## 6. Accessing your personal data

You have the right of access to the personal data we have possession of, subject to certain legal limitations (e.g. in order to protect the rights and freedoms of other individuals).

If you wish to access your personal data then you should submit a written subject access request which:

1. Identifies who you are (we may seek confirmation of identity); and
2. States what personal data you wish to access

We will normally comply with subject access requests within one month of receiving the request unless it is a complex request. There is no charge for this.

Subject access requests should be made using the contact details below.

## 7. Deletion of personal data

We will delete personal data once we no longer have a lawful reason to hold and use it, unless you ask us not to delete it.

You have the right to have personal data deleted in certain circumstances. If you wish for personal data to be deleted then you should contact us in writing setting out what data you wish to be deleted. Requests should be submitted using the contact details below.

## 8. Complaints

Any complaints in relation to the Company's use of your personal data should be addressed to the contact below or through the Company's grievance procedure. You may also report data protection concerns to the Information Commission on 0303 123 1113 or by using this link:

<https://www.ico.org.uk/concerns>.

## 9. Contact Information

If you wish to make a subject access request, ask for data to be deleted or make a complaint about data protection then please do so in writing to:

<b>Name and position or department</b>	Darren Critchlow – Company Director Haswell Training Ltd
<b>Email address</b>	<a href="mailto:Darren@haswelltraining.co.uk">Darren@haswelltraining.co.uk</a>
<b>Postal address</b>	Unit D10, Pinetrees Business Estate, Salhouse Road, Norwich, NR7 9BB



**Darren Critchlow**  
**Director**  
**Haswell Training Ltd**  
**22 November 23**

# DATA PROTECTION

