Data Protection Policy, Data Protection Impact Assessment and Privacy Notices

v5.7

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Cycle North

This policy sets out how the Cycle North deals with personal information correctly and securely and in accordance with the General Data Protection Regulation, and other related legislation.

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Aims

Cycle North aims to ensure that all data collected about staff, pupils, students, clients and suppliers is collected, stored and processed in accordance with General Data Protection Regulation (EU) 2016/679 (GDPR).

This policy applies to all data, regardless of whether it is in paper or electronic format.

Definitions

Personal data

Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified

Sensitive personal data

Data such as:

- Racial or ethnic origin
- Political opinions
- Religious beliefs, or beliefs of a similar nature
- Where a person is a member of a trade union
- Physical and mental health
- Sexual orientation
- Whether a person has committed, or is alleged to have committed, an offence
- Criminal convictions

Processing

Obtaining, recording or holding data

Data subject

The person whose personal data is held or processed

Data controller

A person or organisation that determines the purposes for which, and the manner in which, personal data is processed

Data processor

A person, other than an employee of the data controller, who processes the data on behalf of the data controller

The company

Cycle North is a trading name of Cycle Leeds Ltd. Any reference to ‘we’, ‘the company’, or ‘Cycle North’, refers to Cycle Leeds Ltd.

The data controller

Cycle North collects, processes and uses personal information relating to staff, pupils, clients and suppliers, and, therefore, is a data controller. Cycle North delegates the responsibility of data controller to the manager with responsibility for Data Protection.

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Cycle North is registered as a data controller with the Information Commissioner's Office, (Registration reference ZA113053), and renews this registration annually.

Cycle North is collecting this data and will process it for the purpose of conducting, administrating, monitoring and evaluating the cycling activities which form the core business activities. Cycle North may also use this data to enable the communication of details of cycle training opportunities and other cycling activities. In addition, the Cycle North may be required by law to collect, use and share certain information.

Data protection principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

- Personal data shall be processed lawfully, fairly and in a transparent manner
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)
- Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;
- Personal data shall be accurate and where necessary, kept up to date;
- Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- Personal data shall be processed in a manner that ensures appropriate security of the personal
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless the country or territory ensures an adequate level of protection for the rights and freedoms of data in relation to the processing of personal data
- Roles and responsibilities The governing board has overall responsibility for ensuring that Cycle North complies with its obligations under the Data Protection Act 1998 and GDPR 2018. Day-to-day responsibilities rest with the manager with responsibility for Data Protection at Cycle North. They will ensure that all staff are aware of their data protection obligations, and oversee any queries related to the storing or processing of personal data.
- Staff are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform Cycle North of any changes to their personal data, such as a change of address.

Cycle North's Commitment

Cycle North is committed to maintaining the principles and duties in the GDPR at all times. Therefore Cycle North will:

- Inform individuals of the identity and contact details of the data controller.
- Inform individuals of the contact details of the Data Protection Officer.
- Inform individuals of the purposes that personal information is being collected and the basis for this.
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.
- If the Cycle North plans to transfer personal data outside the company, Cycle North will inform individuals and provide them with details of where they can obtain details of the safeguards for that information.
- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the Cycle North will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept.
- Should the Cycle North decide to use an individual's personal data for a different reason to that for which it was originally collected the Cycle North shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests.)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Privacy notices

(Copies of privacy notices are available on the Cycle North website)

Pupils

We hold personal data about pupils to support teaching and learning. We also use medical data to provide appropriate care, but this is not retained beyond the respective training dates. We receive data about pupils from parents, schools and local authorities.

This data includes, but is not restricted to:

- Names, year group, class and school details.
- Data on pupil characteristics, such as social and behaviour issues, or special educational needs

- Exclusion information
- Details of any medical conditions

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about pupils with anyone without consent, unless the law and our policies allow us to do so. Individuals have the right to receive a copy of the information that we hold about them or their child. Such information will be provided promptly by the manager with responsibility for Data Protection.

We are required, by law, to pass certain information about pupils to specified external bodies, such as our local authority and the Department for Education, so that they can meet their statutory obligations.

Staff

We process data relating to those we employ to work at, or otherwise engage to work at, Cycle North. The purpose of processing this data is to assist in the running of the Cycle North, including to:

- Enable individuals to be paid
- Facilitate safe recruitment
- Support the effective performance management of staff
- Improve the management of workforce data across the sector
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring

Staff personal data includes, but is not limited to, information such as:

- Contact details
- National Insurance numbers
- Salary information
- Qualifications
- Absence data
- Personal characteristics, including ethnic groups
- Medical information
- Outcomes of any disciplinary procedures

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about staff with third parties without consent unless the law allows us to.

We are required, by law, to pass certain information about staff to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

Any staff member wishing to see a copy of information about them that the Cycle North holds should contact the manager with responsibility for data protection.

Students (Course participants)

We process data relating to participants in, and candidates for, the courses we run, including Cycle Training Instructor courses, First Aid courses etc. The purpose of processing this data is to facilitate the running and administration of these courses, including to:

- Enable individuals to be identified and their progress tracked and recorded
- Report their attendance, engagement, progression and achievement with the awarding bodies of the qualification.
- Facilitate safe recruitment
- Facilitate effective quality monitoring and reporting of the course
- Support the effective performance management of students
- Improve the management of student data across the company
- Inform our recruitment policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring

Student personal data includes, but is not limited to, information such as:

- Contact details
- Progression details
- Qualifications
- Attendance and Absence data
- Personal characteristics, including ethnic groups
- Medical information
- Details and Outcomes of any appeals and/or complaints

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information about students with third parties, other than the awarding bodies of the qualifications, without consent unless the law allows us to.

We are required, by law, to pass certain information about staff to specified external bodies, such as our local authority and the Department for Education, so that they are able to meet their statutory obligations.

Any staff member wishing to see a copy of information about them that the Cycle North holds should contact the manager with responsibility for data protection.

Subject access requests

Individuals have a right to request access to information the Cycle North holds about them. This is known as a subject access request.

Subject access requests must be submitted in writing, either by letter, email or fax. Requests should include:

- The individuals name
- A correspondence address

- A contact number and email address
- Details about the information requested

Subject access requests will be processed within 15 working days.

Storage of records

Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept secure when not in use

Papers containing confidential personal information should not be left on office desks, on staffroom tables or pinned to noticeboards where there is general access

Where personal information needs to be taken off site (in paper or electronic form), this will be done as securely as possible and kept on the person of an appropriate staff member..

Passwords that are at least 8 characters long containing letters and numbers are used to access Cycle North computers, laptops and other electronic devices. Staff are reminded to change their passwords at regular intervals

Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices

Both employed staff and external contractors who store personal information on their personal devices are expected to follow the same security procedures for Cycle North-owned equipment

Disposal of records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely. For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.

Training

Our staff are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation or to Cycle North's processes make it necessary.

Monitoring arrangements

The manager with responsibility for Data Protection is responsible for monitoring and reviewing this policy.

This document will be reviewed when any new regulation comes into force, and then every 2 years.

At every review, the policy will made available to staff and stakeholders.

Complaints

Complaints will be dealt with in accordance with the Cycle North's complaints policies. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

Contacts

If you have any enquires in relation to this policy, please contact the manager with responsibility for Data Protection, as identified on page 2 of this document.