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| *'Creating Brighter Futures' is the underpinning mission and purpose of FNTC. (Inspiring learning to achieve success)* | **Policy Number: PP-OM- 12**<br>**Version: 2**<br>**Issue Date: April 2016, April 2018**<br>**Review Date:  April 2020** |
| **Policy title: Management of Data and Information Policy** | |
| **Policy author:** | Melanie Davies |
| **Policy Owner:** | Office Manager |
| **Impact assessment status:** | ❒ Full impact assessment required |
| **Approved by: SLT** | **Date: April 2016** |
| If you need help reading this document, or require it in a different format, please call 02380 866664<br>Chief Executive Officer: Elizabeth Young | |

## 1. Introduction

In order to monitor its work effectively and in line with ESFA and other governing bodies requirements, FNTC must maintain a database of learner and employer information from recruitment to completion and retain such records for as long as appropriate. The lawful processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract. The data required will change in response external requirements and therefore will have a dynamic nature. This procedure will be revised only when significant changes are introduced.

FNTC will use this policy as a prescription for the application of best practices in the gathering, maintaining, storing and reporting of data in respect of learners previously or currently in training, and of the employers used as placements for those learners.

## 2. Scope

This policy applies to:

- All staff
- To Data Processors i.e. IT providers, awarding organisations and information systems
- System users

## 3. Objectives

To maintain all databases, whether hard copy or electronic, in an accurate and consistent format.

To provide a flow of information to FNTC staff to assist them in carrying out their jobs and to provide a tool for management decision making.

To secure and use information in line with procedures and legislative requirements.

## 4. Responsibilities

The following details key people who have access to and processes personal data:

- Office Manager is responsible for the implementation of this policy.
- Data Protection Officer is responsible for compliancy of this policy and will implement the audit schedule, therefore will have access to PICs and the ability to run reports.
- GFD /MIS assistant– responsible for all learner data including data entry and deletions
- MIS – responsible for all learner entry onto live PICs and authority to edit and read all aspects of learner database (PICs) and CRM except deletion of students
- Curriculum Managers – Responsible for informing MIS to carry out tasks related to learner journey including starts, early leavers and completions.

- The Senior Administrator is responsible for signing off completions checking all elements of the qualification have been completed and forwarding onto MIS.
- BD are responsible for collating personal data from learners and employers ensuring consent has been obtained where appropriate. BD are also responsible for updating CRM, therefore has editing rights in CRM and also application system
- DCQ is responsible for suspensions of learners and early leavers. Ultimately responsible for learner completions
- Examination Officer – is responsible for updating PICs with achievements therefore has access and editing rights to PICs.
- Certification Officer is responsible for updating PICs with achievements therefore has access and editing rights to PICs.
- Accounts are responsible for processing payments and invoicing clients
- CEO responsible for subject access requests
- Human Resources is responsible for processing DBS checks and maintaining staff records
- **ALL INDIVIDUALS ARE RESPONSIBLE FOR REPORTING DATA BREACH WITHIN 24 HOURS TO ALLOW THIS TO THEN BE REPORTED TO INFORMATION COMMISONERS OFFICE.**
- **DATA PROCESSORS WILL BE REQUIRED TO NOTIFY THEIR CUSTOMERS AND CONTROLLERS OF THE DATA BREACH.**
- **Coaches/Teacher are responsible for ensuring their caseload data is up to date and accurate and stored appropriately within the guidelines of this policy**

Purpose for which data can be used

- To meet the requirements of ESFA
- To ensure correct claiming of qualifications
- To investigate fraudulent claims
- To meet the needs of the clients in fulfilling placements
- To meet the needs of the learners to fulfil their personal development and social needs, achieving qualification and finding a placement
- To conduct initial assessments
- Maintaining customer relations in accordance with funding requirements and HMRC requirements.
- To ensure effective recruitment, retaining and promoting staff alongside HR legislation

## 5. Procedure

This procedure prescribes the practice to be applied in managing all aspects of information from and about learners and employers. These practices are described in the sections identified below and where appropriate in the appendices to this document.

### Data Storage

When data is stored on paper, and being processed, it should not be left unattended on a printer or desk where it could be viewed by unauthorised people. When it is not being used, data should be held in a locked cabinet or secure facility and not be accessible to unauthorised people. All printed data that is no longer required must be shredded in the office.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. To meet these requirements:

- All our data is held on secure servers
- Data should be protected by strong passwords that are changed regularly and are not shared.
- No data should be stored on removable media, without the written permission of the Data Protection Officer or the ACEO.
- Data should only be stored on live or development systems and designated drives and servers.
- All servers and secure storage devices containing data should be protected by approved and tested software and firewalls
- Data should be backed up daily.
- No data should be saved onto laptops, tablets, mobile phones, CDs or memory sticks.

**Data accuracy**

For both our operations, and in order to meet the requirements of the GDPR and DPA, FNTC, its staff, the Certification Bodies and system users must take reasonable steps to ensure that data is accurate and up to date:

- Data will only be held in the systems FNTC operates in order to maintain data security
- Data can only accessed by those with relevant permissions and access will require a password
- Both staff and system users should take every opportunity to ensure that data is kept up to date
- All data that is no longer valid will be removed. For example, if a telephone number can no longer be accessed then it should be removed from a record.

**Use and Maintenance of PICS**

PICs (Provider Integrated Client System) is the Prime Management Information system (MIS) to be used for FNTC's management information. For this reason, it is essential that data is kept up to date and that any and all changes, to any learner or employer information or circumstances are relayed to the MIS team.

Particular attention shall be given to the following elements

i. Any Accredited Prior Learning (APL) which has been recognised by the coach shall be noted on the ILP. Exemptions shall be applied only after copies of certificates are provided.

ii. All prospective learners shall undertake a skills assessment, this alone will establish if learners are recognised for Learner Support Funding (LSF). This funding is exceptionally available for statemented level 3 learners

The entry of data to PICS is the responsibility of the MIS team.

The prime source of data will be the Individual Learner Record (ILR) completed at the commencement of each course and sent to MIS for entry to PICS which will then be integrated with Smart Assessor

**Changes to Data**

All requests for a change shall be in writing using the PICS form and submitted to MIS.

All changes to data held on PICS will be subject to the delegated level of authority.

Reports

MIS will prepare the reports in accordance with the reports cycle as and when requested as well as set reports such as the SLT report. Where possible, these standard reports should be used. If a recurring new need arises, the user should discuss with MIS the option of amending an existing report to meet the new need.

**Data Protection**

The nature of the information held on PICS, SAGE and Smart Assessor is inherently confidential and shall not be disclosed or be made available outside FNTC or to unauthorised employees of FNTC. All information systems shall be password protected and access granted only to those employees having need. Any information on personal or shared computer systems shall include only such information as is necessary to carry out their job. Passwords will be regularly changed.

**6.** Individual rights

General Data Protection Regulations provides the following rights to individuals:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (we have one month to respond to request)
- Right to restrict processing

- Right to data portability
- Right to object
- Rights and relation to automated decision making and profiling.

### 6a. Subject Access Request

All individuals or organisations are entitled to ask about data held about them.
They can:

- Ask what information FNTC holds on them and why
- Ask how to gain access to it.
- Be informed how to keep it up to date
- Be informed on how FNTC is meeting its data protection obligations.

Such a request for information is called "subject access request". All such requests must be forwarded to the CEO.

Applications for subject access data can be made by email to DPO@fntctraining.co.uk or by post. The title of the email should state that it is a "subject access request". FNTC will aim to provide the relevant data within 10 working days.

FNTC will always verify the identity of a person making the request before providing the information.

### 7. Communication

Once approved this policy and procedure will be shared via all staff email and stored in Quality\Policies and Procedures. The policy and procedure will be discussed at team meetings as well as being added to the office files for all staff to have reference.

### 8. Monitoring and Evaluation

All procedures listed in this Policy will be reviewed on an annual basis.

Reports produced by the MIS team on a monthly basis will be presented at the monthly SLT meetings. Data produced will be monitored against the SFA paperwork including the Employer Responsive Performance Report (EYPR). Financial monitoring will also be analysed against the Provider Financial Report (PFR).

### 8. Associated information, Guidance and related Policies

- **PP-OM-06 Acceptable use of information and communications technologies policy**
- **PP-CD-03 Management of Data and Information Policy**
- **PP-CD-05 Record Retention – Destruction Policy**

- **PP-HRO-05 Whistle blowing policy and procedure**
- **PP-HRO-06 Staff Disciplinary policy and procedure**
- **PP-HRO-09 Safeguarding policy and procedure**
- **PP-HRO-10 Staff capability policy and procedure**
- **PP-OM-04 Photography and videos policy and procedures**
- **PP-OM-06 Acceptable use of information and communications technologies policy**
- **PP-OM-07 the use of company mobile phones policy and procedure**

**Annex1**

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| **Initial Equality Impact Assessment** | |
| **Audit Prompt** | **Response** |
| Name of document: Management of Data and Information  Policy | |
| Author of document:   Melanie Davies | |
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| **Initial screening questions** | |
| 1. What is the aim or purpose of the document? | The aim of this policy is to ensure that data and other management information is accurate and secure |
| 2. Who is affected by the document?<br>• Staff<br>• Learners (please indicate which groups)<br>• Members of the general | All stakeholders including<br>1. Staff<br>2. Learners<br>3. Partners |

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| public (please specify who) | |
| 3. Has anyone complained about the document?<br>(if yes, give details) | No |
| 4. Does the document have the potential to cause adverse impact or discriminate against different groups of people? | No |
| 5. Does the document make a positive contribution to equality & diversity in the Centre? | Yes |

A full impact assessment will be needed if this initial screening reveals an adverse impact, or potential for adverse impact on people with protected characteristics.

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| Refer to full Impact Assessment<br>(Yes/No) and reasons why | |
| If yes, Priority Level<br>(High, Medium, Low) | |

Signed: __ MDavies ___ Name:Melanie Davies Office Manager Date: 25th May 2018