

Autus, The Hao2eu Foundation Data Protection Policy

1. Background

The Data Protection Act covers information about individuals which is held on computer or in a manual filing system, or which is recorded with the intention that it will be part of such systems. The Act applies to people or organisations that use or hold such personal data.

The Act is based on the right of the individual (the Data Subject) to know what information is being held about them, and how the information will be used. The Act sets out principles to ensure that personal data is:

1. processed fairly and lawfully with consent from the individual
2. obtained only for specified on a lawful basis
3. relevant to the purposes for which it is processed and legitimate interest of AUTUS
4. accurate and kept up to date
5. not kept for longer than is necessary
6. processed according to the rights of the Data Subject under the Act
7. protected against unauthorised processing, accidental loss or damage
8. not transferred to areas outside of the European Union (including via websites)

Autus holds personal information on employees, contractors, service users/learners and volunteers and is registered with the Information Commissioner as a Data Holder.

Autus seeks to comply with both the letter and the spirit of the Act. The organisation will ensure that all personal information is collected and used fairly, stored safely and not disclosed to any other person unlawfully. Autus staff must abide by this policy.

2. Policy

As part of GDPR compliance we conducted a full review of our Data Protection, Information Security and Website Privacy policies in April 2018 and updated this policy.

3. General

- a) We will approach your personal information with privacy by design in mind, by promoting privacy and data protection compliance from the time you express an interest in or register for one of our programmes.
- b) We will take the minimum amount of data necessary to enable us to deliver the service to our service users.
- c) We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations.

4. **Information We Collect**

- a) Personal Information is taken via our online registration form and stored for 3 months; this is comprised of name, age, telephone number, email address, borough and IP address
- b) Individuals who choose to undertake a skills development programme may be required to provide additional information via our online portfolio. For example, individuals who do an accredited qualification will need to provide their data of birth, address and ethnicity. This information will be shared with the Awarding Body.
- c) Individuals who are fully funded by charitable or Government funding may also need to provide further information.
- d) Information we collect is processed in the UK

5. **Storing Personal Data / Records**

- a) Autus staff have access to personal information via our secure IT system. Volunteers do not have access to personal information of service users.
- b) We will take all reasonable steps to keep personal data secure, up to date and accurate.
- c) Personnel data will be stored for 3 years after an employee, contractor or volunteer has worked for the organisation. Unless the organisation is specifically asked by an individual to destroy their details it will normally keep them on file for future reference. The CEO has overall responsibility for destroying personnel files.
- d) Where learners or service users are beneficiaries of funding their personal data will be stored for the amount of time required by the funding body always in accordance with this policy.
- e) Where learners are beneficiaries of funding it may be necessary for Autus to share the following types of data linked directly to a named learner with the funding body and project delivery partners:
 - i. Course Attendance Information
 - ii. Performance, achievements, and qualifications
 - iii. Programme feedback
 - iv. Information relevant to the effective delivery of the programme

6. **Paper Based Records**

- a) It may be necessary to keep some personal records at our office (24 George Street, Croydon).
- b) Personal data is kept in paper-based systems are stored in lockable cupboards accessible by authorised staff.
- c) Documents are only kept for the amount of time there is a valid use case as defined by GDPR after which time they will be destroyed. Examples of use cases relevant to Autus include learner records where participants have attended fully funded programmes or learner portfolios for individuals who have undertaken an accredited qualification.

7. Avatar IDs

- a) We do not require your personal information for set up of an avatar for our virtual learning environment.
- b) All avatar ID's should be first name, initial and course or Grid name
- c) Should an individual register their avatar incorrectly and uses an ID that can identify them we will delete that account and create a fresh ID that meets our protocol. The individual will be notified.

8. Information Sharing

- a) Other than as stated above in clauses 4b/d and 5d information about individuals will not be disclosed to any third party outside of the company without the permission of the individual.
- b) We will advise you of the information that we are required to share and ensure only necessary information for course administration and / or funding compliance is shared.

6. Data / Information Requests

- a) Individuals have the right to see the information held on them by the company. Requests should be in writing to CEO who will provide a copy of the information within two weeks of receiving the request. No charge is made.
- b) You have the right to obtain confirmation that your personal data is being processed.
- c) When data is longer relevant to its original purpose, you can request that we erase your personal data. Please note that we will not hold your data for longer than is necessary to fulfil our obligations.

7. Data Breach

- a) In the event of a data breach, we will notify the Information Commissioner and our service users of the breach and any risk within 72 hours.

8. Data Portability

- b) Autus keeps data in formats that are easily transferable across IT environments
- c) You have the right to request and obtain an electronic copy of the personal information we hold
- d) You are entitled to obtain and reuse your personal data for your own purposes by request.

9. Complaints

- a) Please contact us if you are not satisfied with how we are holding or handling your personal data.
- b) You have the right to complain directly to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

Please see below for contact details of the ICO:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

Email: casework@ico.org.uk

Making a complaint will not affect any other legal rights or remedies that you have.

10. Summary of Your Rights

We thought it would be useful to provide a table with a summary of your key rights under Data Protection / GDPR. This is not an exhaustive list but provides key areas relevant to Autus's use of personal information.

Your rights include:

	Right	Description
1.	The right to access your personal information	You are entitled to a copy of the personal information we hold about you and details of how we use it. There will not usually be a charge for dealing with these requests. Your information will usually be provided to you in electronic format.
2.	The right to rectification	We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.
3.	The right to erasure (also known as 'the right to be forgotten')	In certain circumstances, you have the right to ask us to erase your personal information. Examples would include where the data is no longer required for the original purpose, consent has been withdrawn and there no overriding ground for continuing the processing, or for compliance with the national law.
4.	The right to restriction or suspension of processing	In certain circumstances, such as a question over its accuracy, you are entitled to ask us to stop using your personal information or to suspend its use.
5.	The right to data portability	In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.
6.	The right to object to processing	For certain uses of your personal information, we will ask for your consent. This consent can take the form of an action or affirmative instruction. Where we do this, you have the right to withdraw your consent to further use of your personal information.

Related policies:

Website Privacy Policy

IT Security Policy