Data Protection Policy – Lion Training Passport

Introduction
The Data Protection Act 1998 describes how organisations collect, handle and store personal information. Poultec Training Limited, as administrators to the Lion Training Passport, are required to comply with this legislation, by ensuring that personal information is collected and used fairly, stored safely and not disclosed unlawfully.

Poultec Training Limited is registered under the Data Protection Act 1998 and adheres to all aspects of the legislation.

Policy Scope
This policy applies to the information obtained by Poultec Training Limited in the registration and maintenance of Lion Training Passports. This also includes the information obtained through the approval of courses on behalf of Lion Training Passport Management Group.

Data Protection Risks
This policy helps to protect Poultec Training Limited and the Lion Training Passport project from data security risks including:

- Breaches of confidentiality in relation to individuals or companies
- Failing to offer choice on how data is used
- Reputation damage due to unauthorised access to sensitive data

Responsibilities
Anyone working for or with Poultec Training Limited on the administration of Lion Training Passport has a responsibility to ensure that data is collected, handled and stored responsibly.

The Directors of Poultec Training Limited are ultimately responsible for ensuring that the organisation meets its legal obligations, in conjunction with the appointed Data Protection Officer.

The Lion Training Passport Project Manager is responsible for overseeing the Lion Training Passport project, including:

- Overseeing the set-up of Lion Training Passport registrations.
- Overseeing the population of training data onto Lion Training Passports.
- Authorisation of access to information – Team Managers and Administrators.
- Overseeing the set-up of reporting for organisations.
- Production of non-identifiable reporting statistics for the management group.

- Carrying out approval of courses using methods and standards approved by the management group.

Poultec Training Limited will ensure that formal agreements are obtained and held between Poultec Training Limited and their online solution provider, to ensure that data held on the Lion Training Passport system is protected. The provider will be registered with and comply with all the requirements of the Data Protection Act 1998 and this policy including procedural and physical security measures to prevent unauthorised access to data.

General Guidelines

- Only people who require access to Lion Training Passport to carry out their role within the organisation will be authorised access to Lion Training Passport (eg. to input training information onto Lion Training Passport). Access is only authorised by the Project Manager.

- Authorised users of Lion Training Passport are issued with a username and password to access the system. Access is only permitted to specific area(s) of the system. Usernames and passwords are never shared.

- The submission of data to be populated into Lion Training Passport is encouraged to be submitted electronically, via e-mail to a designated e-mail address. Where paper based information is submitted, those submitting are encouraged to mark envelopes as Private and Confidential and addressed to the Project Manager.

- Staff handling the submitted personal information used for the registration of Lion Training Passports take all reasonable precautions to maintain the confidentiality of information. All staff contracts of employment contain enforced confidentiality clauses.

- Information submitted for the purposes of registration and maintenance of Lion Training Passports is not shared with other departments within Poultec Training Limited, informally or formally.

Data held on Lion Training Passport is regularly reviewed to ensure that the information is accurate and up-to-date. Where information is found to be inaccurate or out of date, this is deleted or securely disposed of, if unable to update.

- Staff carrying out the approval of training against the scheme standards, on behalf of the management group will be independent from staff responsible for the authoring and delivery of training specified within the Lion Training Passport.

Storage of Data

This describes how data submitted to Poultec Training for the purposes of registration and maintenance of Lion Training Passports will be stored:

Electronically submitted information

This information is submitted to a designated e-mail address, which is accessed only by authorised staff. Access is controlled by individual passwords, controlled by Poultec's password complexity and expiry protocols.

Any information saved electronically outside the Lion Training Passport system is saved on the local file server. Access to directories on the file server is authorised on a user-by-user basis, controlled by an individual's password. The file server is located in a locked server room with environmental monitoring. Data saved to the file server is subject to a daily back-up routine to designated local NAS devices housed in locked wiring closets/server rooms. Monthly off-site back-ups are completed and stored in a fire-proof safe off-site. All back-ups are encrypted by specialised back-up software.

Personal data is not held on local drives, removable media, laptops, tablets, smartphones or cloud storage environments.

Paper-based submitted information

Unprocessed information is stored in a locked cupboard prior to inputting onto Lion Training Passport.

Information once processed is shredded prior to disposal.

Information stored on Lion Training Passport

The information held on Lion Training Passport is protected by individual usernames and passwords. Only designated persons have access to the system, to maintain the information held, at an appropriate level of access.

Contractual agreements are in place to between Poultec Training Limited and the online solution provider, which specifically includes clauses in relation to security of data held. These measures include:

- Data is stored on UK based servers located in a secure, climate controlled data centre, which includes physical access control and surveillance systems to prevent intrusion. The data centre includes fire prevention and suppression systems to fight fire without harming servers. The site's power supply is protected by UPS and diesel generators.

- The Poultry Passport System is subject to a back-up routine, provided by the online solution provider. Backups are completed at least daily in relation to the SQL database server and at least weekly in regards to the web server.

Use of Data
The information stored on Lion Training Passport and submitted to Poultec Training Limited for the input onto Lion Training Passport is used only for the purpose of registering and maintain Lion Training Passports.

Those working with the personal information held on Lion Training Passport prevent unauthorised access to the data by only logging onto the system when access is required and locking the workstation when temporarily away from their desk. Paper based information is locked in cupboards when not being used.

Downloaded information from Lion Training Passport is not stored on local drives of computers, only in a secure location on the file server, which has restricted access.

Information is not shared with other departments within Poultec Training Limited or used for the promotion of Poultec's training activities unless specifically requested in writing by an organisation. Information will not be shared with other organisations, unless a written request is received from the organisation registering a Lion Training Passport.

Data held on Lion Training Passport is only shared with authorised members of organisations where the individual is employed, at an appropriate level of access.

Statistics produced from data for the monitoring of scheme uptake and performance; including numbers registered and training completed will not include any personal information in regard to the registered person or the organisation employing the registered person.

Accuracy of Data
The law requires that Poultec Training Limited takes all reasonable steps to ensure that the data held is accurate and up-to-date.

Personal Data is only stored on the Lion Training Passport system, along with details of training. No other data sets are created, reducing the likelihood of inaccuracies.

Information is updated only at the request of the registered member of the organisation that employs the registered member.

Annual renewal confirmation letters contain the data held on Lion Training Passport; along with details on how the correct information that is incorrect or out-of-date. Monthly

reports are generated in regard to training required, prompting registered members to update the information held.

Where a registered member fails to renew their Lion Training Passport, this information is archived. This information is deleted after 5 years of being archived.

Access to Information
All individuals who are subject to personal information being held by Poultec Training Limited on Lion Training Passports are entitled to:

- Ask what information is held about them and why.
- Ask how to gain access to it.
- Be informed on how to keep it up-to-date.
- Be informed on how Poultec Training Limited are meeting its Data Protection obligations in regards to Lion Training Passports.

Individuals have access to their Lion Training Passports via a secure login. On accessing their Lion Training Passport the information held is displayed, which includes registration details and details of training completed.

Disclosing Data to Others
Whilst Poultec Training Limited does not disclose information held on Lion Training Passport to others, in certain circumstances the Data Protection act permits the sharing of personal data held to law enforcement agencies without the consent of the individual.
Under these circumstances, Poultec Training Limited will disclose requested data. However we will ensure that the request is legitimate, seeking further advice if necessary.