

ACADEMY4PM

Data Management Policy

Effective From 1st May 2020

This Policy refers to both employees and learners

Document Control:

Date	Version	Chapter	Change
1 st March 2019	V1	All	Baseline Academy4PM Data Management Policy
24 th April 2020	V2	All	Standardisation and Review by Ceri Hartnell
24 th April 2020	V2	All	Review – waiting for approval by Executive Director
1 st May 2020	V2	All	Approved by Joseph Alba – Executive Director

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Purpose & Scope

The purpose of this policy is to ensure that all data created and used within Academy4PM is managed and curated to the highest possible standards throughout its lifecycle, while remaining compliant with the relevant legislation on access and privacy. The policy builds on the organisation's commitment to data protection and management and reflects and adheres to the recommendations, practices and principles set out in legislation.

The policy applies to Academy4PM employees and learners who are engaged in activities which involve the use of personal data. All data gathered and generated, and all systems used to create and store data are subject to compliance measures set out within this policy.

Compliance Frameworks

This policy and its associated practices have been developed to be consistent with other relevant policies and guidance, particularly Data Protection.

Any persons who handle personal information for or on behalf of the organisation including staff, learners, contractors and agents are held liable for the safety and security of that information under the Data Protection Act 2018 and GDPR. The Data Protection Statement is appended to this Policy as Appendix 1.

Mishandling of personal information in any capacity is a breach of Academy4PM's regulations and puts the organisation at risk of non-compliance.

Public access to data may be made under the Freedom of Information Act 2000, however failure to manage data properly leaves Academy4PM susceptible to non-compliance with the act, leaving employees personally liable.

Policy

All data created or owned by Academy4PM is property of the organisation and regarded as corporate assets.

The organisation recognises the value of data as an institutional resource and considers its' value to be increased through the widespread and appropriate use of data by virtue of the data's overall quality. However, Academy4PM considers the value of such data to be diminished through its misuse, misinterpretation and/or unnecessary access restrictions.

Access to data will only be granted to data users for all legitimate purposes, subject to any limited access restrictions that may be determined at the organisation's discretion.

Responsibilities, Provision and Review

The Head of Academy4PM is responsible for overseeing and institutionalising compliance with this policy.

All employees of Academy4PM are responsible for:

- Creation and maintenance of reliable data, where applicable to their role.
- Ensuring that data is properly maintained and remains accessible and authentic beyond reasonable doubt.
- Ensuring the security of data, irrespective of format, and for ensuring that access is only granted to those persons authorised to view it.
- Ensuring data of a sensitive or personal nature is handled in strict confidence and in accordance with legal requirements.
- Supporting efficiency and environmentally friendly agendas by avoiding duplication, and only printing data record when necessary.

Policy Review

This policy and the arrangements for its implementation will be reviewed by the Head of Academy4PM in conjunction with staff and, where appropriate, Learners and Employers on a regular basis.

Appendix 1. Data Protection Statement

Your personal data – data which by itself or with other data available to us – is data which can be used to identify you. This Data Protection Statement sets out how the Academy for Project Management will use your personal data to ensure compliance with the General Data Protection Regulation (GDPR). You can contact our Data Controller – Joseph Alba – joseph.alba@academy4pm.com if you have any questions.

Your personal data, which we will collect directly from you, or indirectly from your employer, and which we use, may include:

- Full name and personal details including contact information, such as email address, home and business address, and home, office and mobile telephone numbers, and emergency contact details
- Date of birth and age – to ensure you are eligible for the programme you wish to follow
- Details of your contract, and a pay slip, to satisfy ESFA funding requirements
- Details of your previous academic and vocational achievements, as required by the apprenticeship standard
- Details and evidence of anything which requires reasonable adjustments to the learning and assessment programme

Where the provision of this data is optional, we will tell you, and will ask for your consent to process it.

Subject to applicable laws, we may record and monitor calls, emails, text messages, social media messages and other communications in relation to our dealings with you and your progress through the programme. We will do this for regulatory compliance, self-regulatory practices, quality control and staff training, and when it is justified by our legitimate interests and obligations.

We'll process your personal data as necessary to perform the services we have committed to provide under contract with your employer, under your apprenticeship and under the statement which you have signed with us and your employers. We'll also process your personal data as necessary for your own legitimate interests or those of other persons or organisations, such as:

- for good governance;
- to enable you to be registered to undertake examinations and assessment under the apprenticeship agreement and commitment statement
- for participation in government sponsored surveys, analysis and statistics, and for market research.

We will process your personal data to comply with general and specific legal obligations, which includes your own right to make requests and exercise your rights under data protection law.

We will process your personal data based on your consent – such as to enable you to be registered with external organisations for assessment and to send you marketing communications where you have consented to this.

Subject to applicable data protection law, we may share your personal data with sub-contractors who help to provide services under the programme, auditors acting on behalf of your employers, government bodies and agencies in the UK, courts to comply with legal requirements and for the administration of justice, to protect the security or integrity of our business operation, or in an emergency to protect your vital interests.

You can change your preferences at any time by contacting the Academy for Project Management's Data Protection Controller.

You have the following rights under applicable data protection law:

- The right to be informed about our processing of your data
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed
- The right to object to the processing of your personal data
- The right to restrict processing of your personal data
- The right to have your personal data erased
- The right to request access to your personal data and information about how we process it,
- The right to move, copy or transfer my personal data.

Your personal data may be converted into statistical and aggregated data which can't be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

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