



## HORIZON COMMUNITY TRAINING GDPR POLICY & PROCEDURE

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Applicable To	All Community Members
Document Owner	Kath Shanahan
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<b>Availability</b>	Policies & Procedures Folder, SharePoint, Learner and Community Member's Handbook, Company Website

### **Purpose**

This policy describes how Horizon Community Training (Horizon) will ensure all Community Members are aware of what they must do to ensure the correct and lawful treatment of Personal Data.

### **Introduction**

Protecting the confidentiality and integrity of Personal Data is a key responsibility of everyone at Horizon. As an organisation that collects, uses and stores Personal Data about its employees, suppliers (sole traders, partnerships or individuals within companies), students, governors, parents and visitors and users of its services, Horizon recognises that having controls around the collection, use, retention and destruction of Personal Data is important in order to comply with our obligations under Data Protection Laws and in particular its obligations under Article 5 of GDPR.

This Policy sets out the basis on which Horizon will collect and use Personal Data either where the establishment collects it from individuals itself, or where it is provided to us by third parties. It also sets out rules on how Horizon handles uses, transfers and stores Personal Data. It applies to all Personal Data stored electronically, in paper form, or otherwise.

## Principles

Horizon's general obligations are as follows:

All Horizon team members must comply with this Policy.

Horizon Personnel must ensure that they keep confidential all Personal Data that they collect, store, use and come into contact with during the performance of their duties.

Horizon Personnel must not release or disclose any Personal Data:

outside the establishment; or

Inside the establishment to Horizon Personnel not authorised to access the Personal Data, without specific authorisation from their manager or the Data Protection Officer; this includes by phone calls or in emails.

Horizon Personnel must take all steps to ensure there is no unauthorised access to Personal Data whether by other Horizon Personnel who are not authorised to see such Personal Data or by people outside the establishment.

When using Personal Data, Data Protection Laws require that Horizon complies with the following principles. These principles require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary for the purposes for which it is being processed;
- Accurate and kept up to date, meaning that every reasonable step must be taken to ensure that Personal Data that is inaccurate is erased or rectified as soon as possible;
- Kept for no longer than is necessary for the purposes for which it is being processed; and
- Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

In addition to complying with the above requirements Horizon also has to demonstrate in writing that it complies with them. Horizon has a number of policies and procedures in place, including this Policy and the documentation referred to in it, to ensure that Horizon can demonstrate its compliance.

Horizon has carefully assessed how it uses Personal Data and how it complies with the obligations set out above. If Horizon changes how it uses Personal Data, Horizon needs to update this record and may also need to notify Individuals about the change. If Horizon Personnel therefore intend to change how they use Personal Data at any point they must notify the Data Protection Officer who will decide whether their intended use requires amendments to be made and any other controls which need to apply.

## **Transparency**

Where Horizon collects Personal Data directly from Individuals, Horizon will inform them about how Horizon uses their Personal Data. This is in a privacy notice. Horizon has adopted the following privacy notices:

Privacy Notice for Potential, Current and Past Students, Employees and Volunteers

Privacy Notice for Visitors, Suppliers/Contractors, Website Users and Users of Horizon Services

If Horizon receives Personal Data about an Individual from other sources, Horizon will provide the Individual with a privacy notice about how the establishment will use their Personal Data. This will be provided as soon as reasonably possible.