

Data Protection Guidelines

The requirements within these guidelines concern only the administration and certification of **Nuco Training** courses, **FAA** qualifications, and data that is collected during qualification delivery on official course paperwork/documentation.

Under the General Data Protection Regulation (GDPR), both **Nuco Training Ltd** and the registered Trainers/Assessors at **Start Confident First Aid** have a responsibility to ensure compliance with respect to the learner data collected and processed during the administration, delivery and award of training.

These guidelines state how **Nuco Training** requires approved Trainers/Assessors from **Start Confident First Aid** to collect, store and process learner data.

The guidelines are organised into sections to provide easy access to important information and procedures:

Section 1 – Roles and definitions under the GDPR

Section 2 – Collecting Learner Data

Section 3 – Processing Learner Data

Section 4 – Storing Learner Data

Section 5 – Securely Transferring Data

Section 6 – Retention Periods for Learner Data

Section 7 – Securely Disposing of Data

Section 8 – Data Breaches and Notification

Section 1 – Roles and Definitions Under the GDPR

What data is covered under this contract?

All learner data collected through official course paperwork/documentation is included within these guidelines and includes the following processes:

- The collection of learner data through official documentation such as the Learner Workbook or Learner Registration Form, including name, email address, and date of birth. Gender and postcode are collected only if a learner requests entry of their achievement onto their Personal Learning Record.

- The collection of learner special category data when a reasonable adjustment is granted. This is only collected and stored when a reasonable adjustment is granted and may include disability, medical condition or learning need information.
- The storage, of course, paperwork/documentation.
- Upload and maintenance of electronic records of a learner's achievement on NucoPlus.
- The transfer of course paperwork/documentation.

What data is not covered under these guidelines?

The requirements in these guidelines concern only the administration and certification of **Nuco Training** courses, **FAA** qualifications and data collected during qualification delivery on official course paperwork/ documentation.

Under the GDPR, **Start Confident First Aid** Trainers/Assessors consider their own:

- Employee data
- Customer & supplier data
- Learner data for any non-regulated qualifications/courses
- Direct marketing using learner's data
- Business activities that they may conduct
- Additional learner data collected for qualifications not required by **Nuco Training**, such as during course inquiries and booking procedures (relevant Privacy Policies can be found at www.startconfidentfirstaid.com).

This list is not exhaustive, and Trainers/Assessors must conduct their own internal audit of the data they collect and process to ensure GDPR compliance. Full guidance for Trainers/Assessors on GDPR can be found on the Information Commissioner's Office website – www.ico.org.uk.

The GDPR defines two types of data that **Nuco Training** and approved Trainer/Assessors at **Start Confident First Aid** collect, store and process:

• Personal Data

This includes name, email address, and date of birth. Gender and postcode may be collected if needed for entry into a learner's Personal Learning Record.

- **Special Category Data**

Special category data is only collected when a learner applies for a reasonable adjustment and relates to the learner's health, including disabilities, medical conditions, or learning needs.

Note: With these guidelines, the term 'data' refers to both personal data and special category data.

Section 2 - Collecting Learner Data

How do we collect a learner's data?

Learner data must only be collected on official course paperwork/documentation, which has been designed to request only the minimum data needed to allow **Nuco Training** and Trainers/Assessors at **Start Confident First Aid** to administer and award a learner's achievement.

Special category data must only be recorded during a reasonable adjustment application and is required for no other purpose.

Can we collect any additional data?

If a Trainer/Assessor requires additional data for any other purpose, they must conduct their own GDPR audit and ensure compliance before doing so. **Nuco Training's** GDPR audit does not account for any additional data collected by Trainers/Assessors. For more information, refer to **Start Confident First Aid's** Privacy Policy.

Section 3 - Processing Learner Data

Trainers/Assessors at **Start Confident First Aid** must process learner data as part of the administration of the qualification/course that the learner has chosen to undertake.

Trainers/Assessors are only permitted to process learner data whilst entering it onto NucoPlus for certification and record-keeping purposes for regulated courses.

Trainers/Assessors may store a record of learner achievements electronically on their database, but only data collected from official course paperwork/documentation and solely for record-keeping purposes.

No additional processing of learner data is allowed unless covered by **Start Confident First Aid's** own GDPR audit. Please refer to the **Privacy Policy** for details.

Section 4 - Storing Learner Data

What data needs to be kept?

All data generated through official course paperwork/documentation must be retained for three years and six months from the course's final date to provide evidence of a learner's achievement.

How should course paperwork/documentation be stored securely?

Course paperwork/documentation can be stored as hard copy ('paper') or electronic format (e.g., Word or PDF).

- **Hard copy 'paper' format**

Trainers/Assessors must ensure secure storage and take appropriate action to prevent unauthorised access.

- **Paperwork/documentation must be:**

- Securely transported from the course venue to their premises by an authorised person or through a secure carrier (e.g., Royal Mail Special Delivery)
- Kept in a secure storage area with access limited to authorised persons
- Securely disposed of as per guidelines if electronically scanned

- **Electronic Format**

Appropriate security measures must be in place to protect electronic data. Trainers/Assessors must ensure electronic records are stored on secure systems with appropriate access restrictions.

- All systems must use a secure login with unique usernames and passwords.
- Regular maintenance of security software and installation of updates is essential.
- Additional protections should be in place for remote access.

Note: Course paperwork/documentation must be backed up appropriately.

Section 5 - Securely Transferring Data

Hard copy and electronic course paperwork/documentation may need to be transferred, such as for audit requests by Nuco Training.

- **Hard Copy Format**

Secure mail services (e.g., Royal Mail Special Delivery) should be used, and a backup copy taken before sending.

- **Electronic Format**

Options for secure electronic transfer include:

- **NucoPlus** – A secure server upload with login-protected access.
- **Email (encrypted)** – Encrypted 'zipped' folders with alphanumeric passwords sent separately.
- **File Hosting Services (e.g., Dropbox)** – Set an expiration date and password; share link and password separately.

Section 6 - Retention Periods for Learner Data

Course paperwork/documentation must be retained for three years and six months from the final course date. Records are maintained to allow complaints/appeals or confirmation of achievement requests to be dealt with appropriately. This data may also be used for auditing purposes. Data should be securely disposed of after this period.

Section 7 - Securely Disposing of Data

Paper-Based Data

- Shred onsite or have it securely disposed of by a certified specialist.

Electronic Data

- Delete records completely from all systems and backup locations.

Section 8 - Data breaches and notification

Under the GDPR **Nuco Training** has a legal duty to notify the ICO should a data breach occur.

What is a data breach?

A data breach is described in the GDPR as accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of, or access to, personal data.

The following example situations would be considered a data breach:

- Access to personal data by an unauthorised person or organisation
- Deliberate or accidental deletion of data
- Sending data to the wrong person
- Computers, phones or any electronic equipment on which data is stored, being lost or stolen
- Paper files, on which data is written, being lost or stolen
- Changing a person's data without their permission
- Loss of availability of data

Our policies are kept under constant review and updated as required – October 2024