

## Introduction

All Gardiner Associates Training and Research (GATR) personnel undertake to adhere to this policy whilst partaking in work for GATR.

Contracts with other organisations may have been secured as a result of assuring the external organisation of GATR's data management and protection ethics, GDPR and privacy policy compliance all of which is in the framework for this policy. Therefore, it is imperative that all GATR personnel comply with this policy. Breach of contracts resulting in cancellations and removal of persons from courses or assessments could be the result of non-compliance.

GATR recognises that staff and associates are remote workers and that there is no single designated office for personnel to work from; therefore, it is important that these simple procedures are adhered to for the safe-guarding of clients' data and GATR business information and to protect data generated by assessments and courses by candidates, learners, delegates and staff. It should be noted that this is also a legal requirement as a result of the introduction of GDPR May 2018.

## Definitions

*Client, Learner, Candidate, Delegate* - Terms used synonymously for customers and organisations requesting and undertaking GATR courses and assessments

*GATR personnel* - Directors, training staff, associates, assessors, IQA, Head of GATR Assessment Centre and SFJ Awards administrator/Centre Coordinator

*Client personal information* - Data of a personal nature including financial data, personal details such as contact details, home addresses, organisation addresses, date of birth, ethnicity details, telephone and email contacts. This includes sensitive data, e.g. ethnicity details.

*Candidate information/data* - Data not of a personal nature generated by Assessors and candidates themselves in relation to Certificate Level 5 and Online learning assessments e.g. candidate details (names, organisation, assessment details)

*ICT Administrator* – GATR staff member responsible for the administration of email and ICT storage systems.

*Director/Head of Information and Communications Technologies (ICT)* - Responsible for the management and administration of ICT; GDPR; Data Management and Protection and Data Privacy.

## GATR Privacy Notice

All GATR personnel should familiarise themselves and adhere to the Privacy Notice located on the GATR website or in the Polices folder on the official shared drives.

## Storage systems and hosted sites

GATR utilises a number of remote storage systems for information and data. These are as follows:

Name	Description	GDPR compatibility	Notes
<b>UK2 Net</b>	Web Site hosting	Server UK based	Gardinerassociates.com
<b>123 Reg</b>	Web domain name	Server UK based	Redirected website gatr.co.uk Proposed Web hosting as from April 2019

<b>Office 365</b>	Online Cloud storage utilised from March 2019	Servers located outside UK <a href="https://www.microsoft.com/en-us/trustcenter/privacy/gdpr/gdpr-overview">https://www.microsoft.com/en-us/trustcenter/privacy/gdpr/gdpr-overview</a>	Storage hosting from April 2019
<b>Synergy Learning</b>	Online-learning hosting	Server UK based	Host for GATR's online courses
<b>QuickBooks</b>	Online Accounting	<a href="https://quickbooks.intuit.com/uk/gdpr/">https://quickbooks.intuit.com/uk/gdpr/</a>	GATR's Financial management system

## Systems and Devices

### *Email systems*

The GATR.co.uk email system is encrypted and secured by Microsoft Office 365 cloud-based email system. All GATR personnel who have been provided with a GATR email address are expected to use this email system when contacting other GATR personnel regarding GATR business and GATR clients. The ICT administrator will ensure GATR personnel utilise the system appropriately and will ensure that an email back-up strategy is in place. Client personal data as a result of email enquiries (attachments) should not be stored on laptops or removable media but stored on the official cloud-storage area only (see below). Personal emails and folders on laptops and personal Computers (PCs) should be regularly reviewed. Emails containing client personal information should be deleted or archived on the email server.

### *Laptops and mobile devices*

It is recognised that GATR personnel must store a certain amount of candidates' data on laptops or other portable/mobile devices however this data should only be stored for as long as necessary to complete the assessment and process the results of an assessment. stage. This data should then be uploaded to the designated area of the cloud server. No client personal data should be held on any laptops, personal computers, mobile devices or removable media. This includes client personal data held as a result of registration forms, financial details or

databases. GATR company details of a sensitive nature should also not be held on any laptop or portable device.

Personal laptops and mobile devices used for GATR work should be password protected. The machine should be virus free with the most up to date anti-virus software actively installed. Steps should be taken to ensure that the machine is kept secure i.e. on the person, out of sight in buildings and not left in vehicles.

Specific laptop machines used for courses and assessments should have all details deleted after use by the relevant course/site manager.

### *Removable media*

As with laptops and mobile devices, removable media (CD, DVD, removable drives) should be secured and password protected. Due to the nature of removable media no client personal information should be placed on the media whatsoever. Candidate data should be deleted as soon as the work is completed.

### *Remote Online (Cloud) storage*

Due to remote working nature of GATR personnel, and the fact that there is no designated permanent office, remote online (cloud) storage - designated in Annex A - is the only official storage method for storing GATR files and information. Despite the fact that some servers are located outside the EEA; the appropriate host company guarantees compatibility with GDPR <https://www.microsoft.com/en-us/trustcenter/privacy/gdpr/gdpr-overview>.

GATR personnel will utilise the official cloud-based storage systems for all GATR work, including the storing of client personal information, GATR business and candidate data. This is in order that all data can be backed up and secured through the appropriate system.

Annex A details the current system and how to access the storage.

### Data sharing

As per the Privacy Notice, no candidate or client data will be shared with any outside agency or organisation without the written authority of the client or candidate (e.g. candidate results shared with SFJ Awards or the delegate's/candidate's organisation.) This should be managed and coordinated through the ICT administrator.

### Candidate Records and Client Database Spreadsheets

Specific documents relating to client personal information and candidate information will be contained in documents that are password protected. These documents are accessed by authorised GATR personnel only.

### Data compromise

GATR personnel have an obligation to report to the Director/Head of ICT immediately when they consider client personal information or client data has been compromised. Examples of this may be if an email containing this information has inadvertently been sent to a wrong addressee or a laptop other mobile device or removable media has been lost or suspected as stolen.

### ICT administrator responsibilities

#### *Security*

The ICT administrator reports to the Director/Head of ICT<sup>1</sup> and will have responsibility for ensuring GATR data and information is secure and backed up. The administrator will also ensure that GATR personnel are adhering to the policy through periodic checks. This may require GATR personnel signing a document to this effect.

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<sup>1</sup> Currently one and the same person (October 2019)

### *Business Continuity*

Business continuity in respect of GATR ICT systems will be set by the GATR ICT administrator.

### **Hard-copy records**

Hard copy records should be kept to a minimum and any client personal information or candidate data will be kept in secure cabinets under lock and key at Phoenix House or at Phoenix Heights Assessment Centre.

### **Termination of Work with GATR**

On completion or termination of work with GATR, personnel will ensure that all data is deleted from all personal computers, mobile devices and removable media. Any equipment that stores data belonging to GATR should be returned.

## **Microsoft Office 365 Online System**

GATR utilises the subscription-based Microsoft Office 365 Online system.

Office 365 is used by a large number of UK-based companies including many fire-services. It provides organisational use of a shared email and storage system. It also allows a number of applications to be used for sharing work and workspaces (Word Excel SharePoint OneDrive OneNote etc.)

The system basically comprises of

- a) a secure and encrypted email system (those personnel provided with a GATR.co.uk address) and;
- b) a secure online storage system for files.

Office 365 allows PC-based apps to access emails or provides for an online app-based service (Outlook.) It is the user's choice which app to utilise bearing in mind Section 5 above.

The service includes the use of a shared calendar, which users should utilise.

Each gatr.co.uk user also has access to their own personal online file space as well as access to the designated shared online storage folders (called libraries). It is important not to mix these two areas up.

GATR's official online storage folders have been set up into 3 libraries via the online system called OneDrive. They are:

- GATR Assessment Centre
- GATR Central
- GATR Directors

These are accessible by going to the SharePoint area of each section or alternatively they can be accessed by going to the OneDrive online areas.

For initial guidance please go to the GATR SharePoint portal page <https://gatruk.sharepoint.com> to access the appropriate SharePoint area. This is similar to an organisational intranet page where information is shared with users.

Please read the relevant Notebook page (OneNote) on the GATR Central site page to set up your computer to receive emails and how to access the calendar and storage.