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## **MJ Training East Ltd – General Data Protection (GDPR) & Privacy Policy**

MJTE has under the GDPR compliance, Article 37 reviewed our data protection policies and procedures and outlined our procedures here.

**Data Controller** – MJ Training East Ltd are the Data controller and we determine the purposes and means of processing personal data.

**Data Protection Officer (DPO)** – Ms Michele Judd (Contact details as above) - Has overall control of how data is processed.

**Data Processor** – Ms Michele Judd & other nominated trainers and event staff - A processor is responsible for processing personal data on behalf of a controller, under the guidance of the DPO.

**Data Handlers** – Other trainers, staff, volunteer and event first aiders – will handle data both on courses and at events etc. before passing it onto the Data Processor.

**Data subject** – Natural person – Including staff/trainers, clients, learners, attendees, suppliers and casualties

### **Other definitions**

**Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## **AT MJ TRAINING EAST LTD**

All staff working on behalf of MJTE are trained in how to keep personal data of our learners and any casualties, visitors to our venues/events, safe. They have been inducted in our systems for collecting, keeping secure and recording of all personal information and aware of our GDPR Policy.

All staff regularly have Internal Quality checks to ensure that they are following procedures and know to advise the DPO immediately if they are aware of any failings in the system.

### **Other organisation's we may share your information with –**

**Qualsafe Awards** - City View, 3 Wapping Road, Bradford. BD3 0ED

Qualsafe Awards (QS) are our Awarding Body for regulated qualifications. They only receive limited information regarding our learners, listed below:

- Learner Name
- Learner Date of Birth
- Date of qualification undertaken
- Name of qualification
- Pass mark

In the event of a Reasonable Adjustment being required for a learner with additional needs, QS will be given details of why the Reasonable Adjustment is required. I.e. learning difficulties, need to read a paper to the learner etc.

Occasionally to satisfy IQA and EQA they may be aware of where the learner undertook the training course.

An EQA will visit our offices or the site of a client that we are delivering a course for.

They will have access to the actual paperwork from a course. This, however, has no more information than listed above, the learner's registration form with full address etc. is not made available to them.

Occasionally we may need to use another Awarding Body for some qualifications that Qualsafe Awards do not cover, if that is the case all personal data will be handled as for Qualsafe Awards.

*(A Copy of their Privacy Policy can be found on their website.)*

**Barnard Sampson LLP** - 3a Quay View Business Park, Barnards Way, Lowestoft, Suffolk NR32 2HD

Barnard Sampson LLP are our accountants and will receive limited information on our clients and suppliers, during their normal duties as accountants, preparing our end-of-year accounts. A copy of their privacy policy can be supplied if required.

## **Google Analytics –**

We can use Analytics Google to track our website traffic, and this helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

**Osam Ltd.** – Registered Office: Suite FF20, Brooklands House, Lancing Business Park, 58 Marlborough Road, LANCING, West Sussex. BN15 8AF

Osam Ltd., has built website, supports and updates the website. They gather some analytics for our website in the course of doing this and a copy of their privacy policy is attached. They only receive/have any access to, limited information regarding our clients, as listed below:

Names, phone numbers and emails given on the contact forms on our website, for the purpose of us being able to reply to customer enquiries.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes. Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

*(A Copy of their Privacy Policy can be found on their website.)*

## **MJTE collect this information for the purposes of:**

Contacting our staff, volunteers, clients, learners and other attendees if required, for ongoing customer management, Including

- To enable us to keep in contact with you and fulfil our contractual obligation
- Providing information regarding our services and to provide appropriate customer care
- Check staff have the relevant qualifications and skills
- To comply with our safeguarding responsibilities
- Ensure reasonable adjustment regarding any medical or learning difficulties are considered
- Confirm the identity of learners for qualifications
- Providing certificates, updates and reminders to clients and learners in respect of their staff / qualifications
- Keeping records of accounts for the purpose of satisfying our legal responsibilities

- Ensuring with regards to a casualty/person being injured or taken unwell, we have the necessary information to treat them, obtain suitable help and inform their next of kin if required.
- For required legal purposes

MJTE do not currently retain any financial information for clients, only employee's information to make back payments to them. MJTE do not currently share any personal data with suppliers, (other than Quallsafe Awards and any other Awarding Body we may be using for that qualification, for the purposes of obtaining regulated qualifications for learners, in accordance with our industries guidelines.)

MJTE have no requirements for exceptional transfers of personal data to third countries or international organisations, as per Article 49(1) of the GDPR.

### **MJTE collect information and personal data on:**

- **Staff** (including trainers and event staff)
- **Clients** (including prospects, if we have been contacted to enquire about services we supply, we keep that contact information, so we can refer back to it, to answer ongoing enquires. We do not use prospects' contact details for ongoing marketing opportunities.)
- **Learners** (those undertaking qualification with us)
- **Casualties** (those treated at events and at incidents we may stop at, i.e., RTA's)
- **Other visitors** (those attending public access training events, workshops)

### **Our lawful basis for processing your general personal data:**

- In the vital interest of the data subject while attending our training to ensure they get the appropriate support to undertake a qualification.
- In compliance with our legal obligation – For example with our accredited qualifications, we are regulated through OFQUAL via our awarding bodies and stipulations are set out regarding what data is required to be processed. To comply with legal requirements to complete and keep accident and incident record forms. To comply with financial regulations as set out by the HMRC.
- To fulfil our contract with an individual in conjunction with their legitimate interest and consent – I.e. If you have provided us with your personal data in order to attend a course, we will use this data to provide your certificate and ongoing support and information.

### **Information we collect for our Staff & Volunteers:**

- Full Name
- Address
- Contact telephone numbers
- Email Address
- DBS information
- Photo for ID purposes

- Relevant qualification certificates
- CV & CPD records
- Record of qualifications delivered
- Next of Kin information

Staff & Volunteers are advised that the above information is required to ensure we can confirm their ID and that they have the relevant qualifications/ongoing CPD required to work with us. We will keep this information safe, both in a locked filing cabinet in our office or at another secure address, (for hard copies of certificates and any IQA documentation etc.,) and on our computer system. This is only accessible to those with a need to see it. I.e., management.

Clients paying us to cover an event or deliver training may require proof of DBS, Safeguarding and appropriate qualifications of any MJTE Staff members this will be provided, however clients will not be able to take any photocopies etc. of these documents.

### **Information we collect for clients:**

- Business Name
- Client contact name
- Business address, phone numbers and email
- Records of invoices to the client
- Emails and conversational history (*for customer management*)
- Records of courses delivered for the and staff who have attended those courses and when

### **How this is kept:**

Emails are kept on our account, so we can refer to conversations and held indefinitely for current clients. Any client who we have had no contact with after 7 years, all their emails will be deleted. Emails are kept on a secure system hosted by Microsoft 360.

MJTE Staff records all courses delivered for the client on a secure computer system, (with a cloud backup with Microsoft Business), so we can advise the client what staff members etc., has undertaken a course with us and when. Personal contact details of their staff, however, will be deleted after 7 years from the last qualification they undertook with us. All learner's information is stored as per stated below in the learner section.

Hard copies of course booking forms are kept indefinitely in locked filing cabinets. The only personal information on these forms are the name of the person in the business who booked the course and their work contact details.

### **Information we collect for learners attending one of our training courses:**

- **Full Name** (*Required as permanent record of training delivered*)
- **Course Date and Course Title** (*Required as a permanent record of training delivered*)
- **Learners Date of Birth\*** (*Required as confirmation of checking the learners ID*)
- **Venue course is held at\***
- **Full Personal Address** (*Required on occasion to post certificates to, last form of contact regarding updates and qualification reminders.*)
- **Clients Name who has paid for the course** (*Required as a permanent record of training*)
- **Contact telephone numbers, landline and mobile** (*Required as second form of contact regarding updates and qualification reminders.*)
- **Email address, personal and work** (*Required as first point of contact regarding updates and qualification reminders.*)
- **Medical Conditions\***
- **Declaration of any learning difficulties\***
- **Results of the learner's qualification undertaken** (*Required as a permanent record of training delivered.*)
- **Reasonable Adjustment information** (*Required for QS is any adjustment was made for the learner i.e. reading a question paper to the learner if they are dyslexic etc.*)
- **Next of Kin Information\***

\*(Only used on the day, then deleted before the learner's registration form is scanned onto the office computer, this information is not held in any databases.)

### **How this is kept:**

All paperwork is kept securely both at the course venue and then at our office. Trainers are instructed not to leave any paperwork out for learners to read and not to leave any paperwork at a client's venue, in cars unattended, other than for comfort breaks while travelling to and from venues.

Course files must be returned ASAP to the office and then are stored at a secure address.

Hard copies are kept for up to 7 years in locked filing cabinets.

Course papers are scanned and then stored securely on our office computer system, with an GDPR approved cloud back up and the password for the computer is regularly changed. No personal information is kept on the work laptop which is solely used for presentations and course delivery. Staff should not have any learner's information on their personal computers and if they were found to do so this would be a serious breach of our GDPR Policy and would be dealt with appropriately. An external hard drive is also used periodically for backups, and again stored in a locked cabinet.

Learners / course information is uploaded onto our office computer by the DPO.

Systems in place to record the course, including the learners, name, address, email, phone numbers, course undertaken and date it was undertaken.

Emails between learners are kept on our email account so we can refer back to conversations and held indefinitely. Learners we have had no contact with after 7 years, all their emails will be deleted. This is on a secure system hosted by Microsoft 360, with the extra security of Microsoft Business support.

After 7 years, hard copies of course paperwork are destroyed by shredding and then incineration on site, so not handled by any outside Organisation.

After 3 years, or when a learner's qualification expires, if sooner, the learners email address is deleted from our main database and they will no longer receive email reminders and updates from us.

After 7 years, from the learner's last qualification undertaken with us, all contact information is deleted on all our databases, their name and qualifications undertaken, along with the date they took them, will remain, as this is part of our client's records. However, we will no longer be able to provide evidence of them having undertaken qualifications with us, as we will no longer hold enough information to prove their identity.

**The learner is advised on every course by the trainer as to why we are collecting the information and what rights they have:**

This information is given verbally at the beginning of all courses, plus, an email footer prompt advises the learner they can ask to have their personal details removed from our databases, on each email sent to them. We also provide a full written version for learners to read if they wish. On signing their registration form they agree that they have either seen and read the document or the details of the document has been explained to them by the trainer and they therefore are acknowledging we have explained their rights regarding GDPR. If a learner contacts us and requests, we delete their information this is done immediately, and their employer advised if required.

**Information kept on casualties treated by MJTE Staff:**

Accident record form includes

- Name of casualty
- Casualty's address, job details
- Date of birth / Age
- Gender
- Date, time and location of incident
- What happened, how it happened, injuries, treatment and ongoing advice
- Observations, past medical history, medication and allergies

**How this is kept:**

At an event / MJTE course, the MJTE event staff / trainers are responsible for completing the first aid record form. This is then kept securely on site and at the end of the event / course returned to MJTE's Office. Once reviewed by MJTE's Health & Safety Officer/Event First Aider, to ensure suitable processes were met by all staff, these are then kept in a locked filing cabinet at a secure address.

With Events - A report will be sent to the event organiser after the event, but no personal information is given to the organisers or their staff, either on the day, or after the event, unless required for the purpose of an investigation and requested by the casualty or their representative.

MJTE staff are obliged to keep all information private, no casualties or injuries should be discussed for the purpose of chit chat but may be reviewed between Event Staff for the purpose of ensuring good practice. Care must be taken to ensure that no discussion takes place where a member of the public may overhear the conversation. Any information being given over the radio must again ensure that personal information is kept private.

At events it may be necessary to use personal mobile phones to contact other event staff. Messenger is not used as it is not deemed secure enough. A 'WhatsApp' group will be formed for each event, as this is secure, and information can be passed via that. As per normal protocol staff must ensure that messages are not left open for any members of the public to read.

If duplicate ARF are being used a carbon copy of the Accident record can be given to those who have a need or right to see it. (Approved Person) I.e. Ambulance Personnel – casualty – casualties' parent/guardian/carer. Further copies, if required, can be given to an approved person taking a photo of the form on a mobile device. If any additional copies of the accident form are made this must be recorded clearly on the form prior to it being shared, including how it has been shared and to whom the Approved Person signs they are going to follow appropriate GDPR guidelines. (Other than in life threatening circumstances.)

Accident records from impromptu attendance at an RTC, casualty on the street etc. Where no accident form is available, staff are advised to make a report on their own mobile phone, as a text message or note. They can share that with an Approved Person and again ensure that you note who you have shared this with, so it is clearly indicated for the purpose of them being aware of the confidentiality of the information.

Once a hard copy of the incident is recorded the text message/note **must** be deleted. Normal guidelines of ensuring the information is kept secure applies.

It may be appropriate to ensure MJTE has a copy especially if the staff member is recognisable as representing MJTE at the time of attending the casualty.

## **Information kept on other visitors by MJTE:**



When we run open public access events, workshops etc., we keep minimal personal data for the benefit of customer management.

- Name (*for any attendance certificate we are awarding*)
- Email Address (*to send a copy of an attendance certificate to, or to send further information if requested*)
- Postal Address (*if an email address is not available or appropriate*)

### **How this is kept:**

The registers for these events are kept on file as a hard copy for up to 7 years in a locked filing cabinet, at a secure address. They are then shredded and incinerated as per our normal protocols.

### **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

**The right to be informed** – We inform individuals how their data is being used, via our ‘Privacy Notices’, available on our website. No automatic opt in clauses are in place on our website.

**The right to access their information** – Systems in place to be able to identify what data we hold and where, on an individual, including emails, hard copies, cloud storage, other individual computers etc.

**The right to rectification of mistakes** – The ability to correct inaccurate personal data, must be rectified within one month of the request.

**The right to deletion (erase)** – An individual can request their personal data is deleted or removed if there is no compelling reason for its continued processing. And within 30 days of the request.

**The right to restrict processing** – An individual has the right to block or suppress processing of personal data. The need to ensure you have identified sound reasons for lawfully processing personal data, is required, therefore this is explained to learners in detail at the beginning of every course. I.e. we cannot remove – their name, date of the course attended and title of the qualification, as this is also part of our ongoing records of courses delivered as well as part of the clients record if applicable.

**The right to data portability** – A member of staff, client and learner can request that personal data stored about them can be transferred to a different service provider, again this must be done within 30 days.

**The right to object** – You must stop processing data unless you can demonstrate compelling legitimate grounds for processing, overriding the interest, rights and freedoms of the individual. I.e. in respect of a legal claim, financial purposes.

**Right in relation to automatic processing and profiling** – (Not relevant to us) I.e. someone applies for a loan and is turned down because their postcode is in an area of deprivation. The individual can ask for human intervention to re assess the application.

**Right to withdraw consent** to hold your personal data at any time. However, learners are made aware before undertaking a course that certain information cannot be deleted.

**Right to lodge a complaint** with a supervisory authority should you be dissatisfied with how we have managed your personal data (the Information Commissioner’s Office (ICO) is the UK’s independent authority set up to uphold information rights in the public interest).

## **Sharing of personal data**

Your personal data will be treated as strictly confidential and will be shared with our trainers and Awarding Bodies i.e. Quasafe Awards on a need-to-know basis and only where relevant to do so.

Data may also be shared with our accountants for the purpose of satisfying our financial obligations and the HMRC.

## **General Statements:**

MJTE are registered with the ICO (Information Commissioners Office)

Michele Judd is registered as the DPO

Registration reference ZB685513

Any breaches of the GDPR the DPO is responsible for informing the ICO as per the current regulations.

With regards to identifying children, MJTE rarely delivers training directly to children under 16, if we do it is normally in partnership with schools and they keep all the personal information, not us.

We do require photo ID for all learners to undertake training with us, as most courses are not accessible to under 14 years of age. Anyone attending a course with us under 16 we obtain written parental permission with regards to what information we keep on the child and how we contact them during the lifespan of their qualification.

Any children treated as a casualty by MJTE staff, normal procedures should be adhered to –

Accident Form completed, age / date of birth obtained, get an appropriate adult to sign the form on behalf of the child and normal safeguarding rules apply.

## **Data Protection Impact Assessments (DPIAs)**

Currently we do not have any processes that we would class would impact on our staff or visitors that are likely to result in a high risk to their individual rights and freedom.

MJTE will review this as and when required.

## **Data Breach Plan**

### **The first 24 hours - Check list**

1. Record the date and time the breach was discovered, as well as the current date and time when response efforts begin (i.e. when data controller is initially alerted to the breach).
2. Alert and activate everyone on a need-to-know basis. I.e. Trainer, client, candidate involved and advise of the situation and plan of action.
3. Secure the premises around the area where the data breach occurred to help preserve evidence.
4. Stop additional data loss. Take affected machines offline if applicable but do not turn them off or start probing into the computer advise our cyber security company and take directions from them.
5. Document everything known thus far about the breach, including who discovered it, who reported it, to whom was it reported, who else knows about it, what type of breach occurred, what was stolen, how was it stolen, what systems are affected and what devices/paperwork are missing.
6. Interview those involved in discovering/involved in the breach and anyone else who may know about it. Document your investigation.
7. Review procedures regarding disseminating information about the breach for everyone involved at this early stage.
8. Assess priorities and risks based on what you know about the breach.
9. Consult Chamber legal representatives to clarify if any regulatory agencies should be notified and, if so, notify them.
10. Ensure everything is documented, inform the ICO if required within 72 hours and review outcomes.

## **Changes to our GDPR & Privacy Policy**

Any changes we may make to our GDPR & Privacy Policy in the future will be posted on our website and, where appropriate, clients, staff and volunteers will be notified by e-mail. Please check back frequently to see any updates or changes in this policy.

## **How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection

Officer, Michele Judd – [michele@mjtrainme.co.uk](mailto:michele@mjtrainme.co.uk)

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with-

The Information Commissioners Office  
T: 03031231113 or via  
E: <https://ico.org.uk/global/contact-us/email/>

Post to:  
The Information Commissioner's Office,  
Wycliffe House, Water Lane,  
Wilmslow, Cheshire. SK9 5AF

Any concerns, issues or questions regarding this policy should be discussed with MJT's Data Protection Officer.

Signed : *M Judd*

Name Ms M Judd

Date : 01/04/2025

MJ Training East Ltd Data Protection Officer

By signing this Policy, you are confirming that you have fully read and understand the Policy as outlined here. If you are unsure on any part of this Policy please contact the Michele, Centre Coordinator (contact details at top of policy)