5.1.2 Trainee Data
5.1.2.1 Privacy Policy

Scope

This policy covers SESP staff and trainees, clients and prospective trainees.

Purpose

This purpose of this policy is to describe the rights and obligations with respect to personal information that is collected, used and stored at and by SESP. The policy also describes similar rights and obligations in relation to third parties who process a SESP candidate's personal data.

Related Policies

Code of Conduct and Ethics

The Policy

- An individual's personal information will only be collected when necessary for functions or activities relevant to SESP business
- Individuals will be informed of the purposes for which SESP collects personal information
- Personal information will only be used for the purposes for which it is collected
- Information collected, the method of collection, by whom it is to be collected will be clearly explained
- For any personal information stored at and by SESP, individuals will be informed of the information being kept, reasons for storage, for how long and by whom that information will be stored
- Employees may request access to their personal information and correct any information pertaining to them

- SESP will take reasonable steps to protect personal information it holds about individuals from unauthorized access, modification or disclosure
- SESP will implement procedures to ensure information that is collected, used or disclosed is accurate and up to date
- Given that SESP conducts academic business with European bodies, SESP endeavours to ensure that its practice is GDPR- compliant according to the above points
- SESP also indicates to its trainees/ candidates in their induction that third party agencies, for example SQA, operating in Europe, must comply with the GDPR with regard to privacy-related issues and set out privacy statements. The trainee/ candidate is informed that the SQA privacy statement details
  - o the personal information processed by this agency
  - o what they do with this information, the legal basis for processing the information
  - o who they share this information with
  - o the rights of the data subject
  - o how long they keep the information
  - o SQA also indicates that it protects information it processes for international centers and candidates by using appropriate measures.

Definitions

Word/Term	Definition
Personal Information	Information or an opinion that is recorded in any form, whether true or not, about an individual whose identity is apparent, or can be reasonably ascertained, from the information or opinion.
GDPR	General Data Protection Regulation [European regulation for the protection of personal data]

Accountabilities

Implementation: Human Resources, Trainee Administration
Compliance: Manager, Human Resources

Associated Forms, Systems and Documents

Trainee Release of Information Policy

Consequences of Non-Compliance

Failure to apply this policy may be considered a breach with regard to the treatment of personal data. Disciplinary action will be managed according to Disciplinary procedures.

5.1.2.2 Records Management Policy

Scope

This policy applies to any record format created received or maintained, electronic or hard copy, by SESP staff or anyone performing work on behalf of SESP including contractors and consultants in the course of carrying out an SESP function or activity.

All staff, consultants and contractors performing work on behalf of SESP must comply with the procedures issued in accordance with this policy.

Purpose

The purpose of this policy is to ensure that records management and information systems support business operations, cater for future expansion and needs, enable accountability requirements to be met and facilitate access to records based information. The policy will ensure that records are created, protected, stored, circulated and disposed of appropriately.

Related Policies

> Trainee Information Release
> Privacy
> ICT

The Policy

Records Management Program

- Responsibility for records management will be assigned to a position;
- Departments are responsible for making arrangements for managing the records relating to their functions;
- Head of Department is accountable for the effective management of the unit's records; and
- Each staff member is accountable to manage records in accordance with authorized protocols.
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Creation of Records

- All staff are obliged to create and maintain records which adequately document the activities in which they take part;
- Professional judgement is required to ensure records are created that will maintain critical decisions and corporate knowledge;

- Records must be created which document decisions and commitments including oral decisions, telephone conversations, emails and decisions made at meetings and other events; and
- All records must be contained in an official file.

<u>Protection of records</u>

- Staff must not relinquish control over, damage, alter or destroy records of SESP without authorization from the Academic Leader or Managing Director;
- Records must be appropriately maintained, stored and preserved; and
- All records, electronic and hard copy must be accessible and retrievable with appropriate security access.

<u>Disposal and destruction of records</u>

- All critical records must be retained;
- Staff may not destroy or dispose of records;
- Staff wishing to initiate the disposal of records are required to contact their line manager;
- Confidentiality of records must be maintained when transporting or destroying material; and
- Records created by SESP staff in the course of their duties may be destroyed by the two following methods:
  - o Shredding
  - o Chemical destruction.

Definitions

Word/Term	Definition
HOD	Head of Department
Record	Information created (electronic or hard copy), received and maintained as evidence and information in pursuance of legal obligations or in the transaction of business.
Disposal	The final outcome concerning records that includes either destruction, further retention or transfer to company archives.
Destruction	Refers to both the physical destruction of records on paper or microform and the permanent deletion of data from analogue and digital media.

Accountabilities

Implementation: All staff
Compliance: All managers

Associated Forms and Documents

- None

Consequences of Non-Compliance

Non- compliance to this policy could result in SESP being in breach of legislation. Accreditation and registration would be at risk.

5.1.2.3 Release of Trainee Information Policy

Scope

The scope of the policy includes the gathering and release of trainee information to the trainee, staff and third parties.

Purpose

This purpose of this policy is to ensure that the confidentiality of trainee information is maintained and that the release of information or data exchange is carried out in such a way as to be compliant with European guidelines contained in the GDPR.

Related Policies

- Code of Conduct and Ethics
- Privacy

Policy
- All information relating to trainees in SESP must be stored securely and only accessed by authorized staff
- A trainee should be allowed access to their own personal information in order to update or amend that information. Proof of identity must be obtained before release of the information is given
- Information relating to trainee data may be released to an approved agency
- Trainees/ candidates are made aware in their induction that some approved agencies, in this case SQA, collect personal data on candidates in order to identify and certificate diploma candidates. SQA also stores information on qualifications taken by SESP candidates. This information comprises the candidate's name, program to be certified and the polytechnic's address
- Information relating to trainees must not be released to non-approved third parties without a trainee's written consent. The only exception to this rule is in case of a legal or police matter where the request is put in writing and approved by the Managing Director
- Personal information must only be collected for the purposes of supporting the functionality, goals and objectives of SESP.

Definitions

Word/Term	Definition
Trainee Information	Any information whether personal or academic gathered and held by SESP
Personal Information	Name, contact phone numbers, passport number, date of birth, employer information, disabilities
Academic Information	Attendance and assessment grades

Third Party	An individual or organization requesting information other than the trainee
GDPR	General Data Protection Regulation, as applied in European member states [followed by SQA].

Accountabilities

Implementation: Registrar
Compliance: Academic Leader

Associated Forms and Documents

None at the time of publication

Consequences of Non-Compliance

Failure to apply this policy may result in the release of personal and academic information without consent. Unauthorised release of trainee information may lead to disciplinary action.

5.1.2.4 Completion and Graduate Tracking Policy

Scope

The scope of the policy includes completion and placement tracking data collection for all graduated cohorts.

Purpose

This policy seeks to ensure the completion rates are able to be produced and documented. The Placement rates will be calculated but not reported, given that all SESP graduates are placed with their company sponsors.

Related Policies

- None

Policy

SESP as an institution will document completion rates for its programs. Additionally, SESP hereby states that all SESP graduates are placed with their company sponsors.

To complete, trainees must undergo a campus based training (program) before completing On the Job Training requirements with their companies (OJT can vary in length between 3 months and six months). At this point the trainees will graduate and receive their certificate and transcript and will be included in completion data.