



Privacy Policy

Introduction:

The North West Roof Training Group known as NW RTG is a subscription-based membership organisation, representing companies who are primarily Roofing Contractors located in the North West and North Wales.

NW RTG is committed to protecting the rights and freedoms of data subjects and to safely and securely processing their data in accordance with all of our legal obligations under the GDPR 2018.

We hold personal data about our Training Providers, subscribed members, suppliers and stakeholders for a variety of business purposes.

This policy sets out how we seek to protect personal data and ensure that we understand the rules governing our use of the personal data to which we have access during their work.

This policy will be reviewed on a regular basis and the NW RTG will be notified of any change.

NW RTG's Committee will be kept abreast of NW RTG GDPR compliance.

Definitions:

Business purposes:

The purposes for which personal data may be used by NW RTG includes:

- Administrative
- Regulatory
- Business development

NW RTG's business purposes include:

- Compliance with our legal and regulatory requirements.
- Ensuring we represent the interests of subscribed members.
- Operational reasons, such as recording transactions.
- Consultant management.
- Arranging/Booking training courses for member companies.

Personal data:

Personal data means any information that can identify an individual.

NW RTG's collection of personal data may include:

- Name, date of birth, national insurance number, phone number, email address, educational background, skills, job title.
- Our website, northwestrooftraining.co.uk (developed and hosted by external providers) collects personal data via Cookies and Google Analytics. Our privacy policy is published on our web site

Special categories of personal data:

This is the collection of extremely sensitive information, such as race, ethnic origin, political opinions, beliefs, trade union membership, health and criminal offences or related proceedings.

This level of information is not collected by NW RTG

Controlling and processing data:

Processing data means how it is used and managed.

- Data Controllers: Determine the purposes for which and the way any personal data is or will be processed.
- Data Processors: In relation to personal data, means any person who processes the data on behalf of the data controller.
- NW RTG operates as both data controller and data processor.
- NW RTG does not automate any of its data processing or management.

Regulatory authority:

The national body responsible for data protection is the Information Commissioner's Office <https://ico.org.uk/>. Individuals have the right to complain to the Information Commissioners if they think there is a problem with the way their data has been handled.

Scope:

This policy applies to all NW RTG support team, who have been trained on GDPR compliance, and who must continue to familiarise themselves with the new rules and comply. It is subject to change and will be updated when appropriate.

The principles:

NW RTG will make every effort to fully comply with the principles of GDPR.

These are:

1. Data collection must be fair, lawful and transparent.
2. Data is only collected for a specific purpose.
3. We will only collect necessary data.
4. The data we hold is accurate and is kept up to date.
5. We will not store data for longer than necessary.
6. The data we hold is safe and secure

Our data:

NW RTG securely holds current personal data from:

- Individual members and customers who we actively engage with.
- Invoices & sales.
- Consultants and training providers with whom we contract from time to time

We share data on an extremely limited and relevant basis with the following:

For member data

- The CITB to fulfil our funding agreement.
- Training Providers of courses booked for/by members.
- The National Federation of Roofing Contractors

For Consultant and Training Provider data

- The CITB to fulfil our funding agreement.
- Accountant to fulfil our statutory and funding obligations.

Other

- Bank, for general business transactions.

IT provider and web developer

- As part of the existing contracts and service agreements we hold with them.

Process and Security:

- NW RTG team collects the minimal amount of personal data required to fulfil business requirements as a membership organisation. It is held securely and is not retained for longer than necessary.
- NW RTG team is aware of the new rules and will comply accordingly. Steps taken daily will include: A clean desk policy, locking data away securely, regular shredding, password protected computers, email accounts and phones and responsible use of data when working remotely.
- All NW RTG team, members and stakeholders, are encouraged to raise concerns over compliance with the Committee Chair.
- NW RTG will write to those who process our data to reflect GDPR requirements.
- NW RTG will specifically communicate the changes in law to members via existing lists and future surveys. Consent must be freely given.
- NW RTG has a privacy policy for its website, surveys and email footers.
- NW RTG will only communicate with its stakeholders when there is a solid business reason for doing so.
- NW RTG will erase data it holds (and notify other organisations if relevant) upon one month of any request, unless there is a reason for not doing so.
- NW RTG will immediately comply with any request to restrict / block or otherwise suppress the processing of personal data.
- NW RTG will meet its requirements in terms of a subject access request / and or data portability request by searching its categorised electronic and limited paper data files, providing information in a clear format and by making requested changes within one month.
- NW RTG is at a very low risk of a data breach. Any such breach would most likely come from an IT or website failure, or loss of a password protected electronic device or a memory stick.

Upon notification of a breach, NW RTG will work with team and suppliers to mitigate the loss of any personal data.

- NW RTG will use password protected / encrypted memory sticks if/when required/used.
- NW RTG will seek the advice of its IT provider in ensuring compliance and act as appropriate.
- NW RTG will conduct annual data audits to ensure compliance with GDPR.

APPROVAL:

This policy statement was reviewed and approved on 31 May 2018 by Alan Houghton, Group Chair.

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