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Johnston K9

General Data Protection Regulation Policy

Statement

GDPR stands for General Data Protection Regulation and replaces the Data Protection Act 1998. It was approved by the EU Parliament in 2016 and comes into effect on 25th May 2018. GDPR states that personal data should be 'processed fairly & lawfully', be 'collected for specified, explicit and legitimate purposes' and may not be processed without the knowledge of the individual to which it pertains and may only be processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Johnston K9 is committed to protecting the rights and freedoms of individuals with respect to the processing of data. It recognises individuals right to know what information is held about them and ensure that personal information is handled properly. Where an individual requests access to the data Johnston K9 holds about them it will comply with this request immediately without charge.

GDPR includes seven rights for individuals

1. The right to be informed

Johnston K9 provides individual training in people's own homes, at classes in community venues and provides examinations as part of the Kennel Club Good Citizens Scheme, thus it is required to collect and manage certain data. We need to know owner names, ages, addresses, telephone numbers, email addresses, and any medical information that is relevant should the owner become unwell during a training session. We need to know dog's pet and where registered full kennel names, age, vet details in case of injury or infection, to confirm vaccination and microchipping prior to commencement of training and for correspondence regarding behavioural therapy.

Where individuals wish to be examined as part of the Kennel Club Good Citizens Scheme some of this information - namely the owner name, dog pet and kennel name, and training venue attended, is sent to the Kennel Club via a secure electronic file transfer system.

Johnston K9 employs eight Trainers under the management of Head Trainer Gareth Johnston, data provided by individuals about themselves and their circumstances that is relevant to writing the training plan for the dog can be accessed by all trainers from our central database. Information relevant to session planning and delivery for each individual may also be shared amongst staff using the Johnston K9 webmail account. This account is password protected and can only be accessed by members of the team who are all DBS checked. Data will not be transmitted using personal accounts or stored on personal computers.

As an employer Johnston K9 is required to hold data on its employees; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID such as passport and driver's license, bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to UKCRBs for the processing of DBS checks.

Johnston K9 uses Cookies on its website to collect data for Google Analytics, this data is anonymous.

2) The right of access

At any point an individual can make a request relating to their data and Johnston K9 will need to provide a response. Johnston K9 aims to comply with such a request within 24 hours, with a maximum time period of 1 month. The individual will have the right to complain to the ICO if they are not happy with Johnston K9's response.

3) The right to erasure

Individuals have the right to request the deletion of their data where there is no compelling reason for its continued use. However, Johnston K9 has a legal duty to keep certain data for a reasonable time*, for example for audit and accounting or accident and injury inquiries. Staff records must be kept for 6 years after the individual leaves employment. This data is kept securely and shredded after the legal retention period.

4) The right to restrict processing

Customers and staff may object to Johnston K9 processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

5) The right to data portability

Johnston K9 requires data to be transferred from one IT system to another; such as from Johnston K9 to the Kennel Club. The Kennel Club use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

6) The right to object

Customers and staff can object to their data being used for certain activities like marketing or research.

7) The right not to be subject to automated decision-making including profiling

Automated decisions and profiling are used for marketing. Johnston K9 does not use personal data for such purposes.

Storage and use of personal information

All paper copies of records are kept in locked filing cabinet. Members of staff can have access to these files but information taken from the files about individuals is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.

Where data has been provided via email enquiry, website contact form or social media messaging this will only be used to contact the individual regarding the information they have specifically requested and will not be used for marketing. If the individual does not chose to attend training this information will be immediately deleted from all systems and records.

Information about individuals is used in certain documents, such as the weekly group training register, examination forms, referrals to external agencies (such as vets) and disclosure forms. These documents include data such as names, ages and sometimes address. These records are shredded at the end of the relevant retention period.

Upon leaving Johnston K9 training data held on the individual and their dog/s will be removed, and paper records shredded, in accordance with the record retention table which can be found in Appendix One of this document.

Johnston K9 personal data held visually in photographs or video clips or as sound recordings is held with explicit written consent obtained via the Johnston K9 training registration form. No names are stored with images in photo albums, displays, marketing materials, on the website or Johnston K9 social media accounts.

Access to all computers, the Johnston K9 website and Johnston K9 webmail account is password protected. When a member of staff leaves the company these passwords are changed in line with this policy. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet. All devices used to access and store personal data are protected with commercial security and anti-virus software.

GDPR means that Johnston K9 must; * Manage and process personal data properly * Protect the individual’s rights to privacy * Provide an individual with access to all personal information held on them

This Policy was adopted at the Johnston K9 full team meeting on 29th April 2018.

Signed on behalf of Johnston K9

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Policy review date: September 2018

*please see attached table for record retention periods

Appendix One

Individual Customer Records	Retention period	Status	Authority
Registration forms, registers, record books, accident records, photos and videos and all other personal data about individual owners and dogs	Until the individual stops training with Johnston K9	Requirement	GDPR Information Commissioners Office (ICO)
Records of any reportable death, injury, disease or dangerous occurrence	3 years after the date the record was made	Requirement	RIDDOR Regulations 1995
Personnel	Retention period	Status	Authority
Personnel files and training records (including disciplinary records and working time records)	6 years after employment ceases	Recommendation	Chartered Institute of Personnel and Development
DBS check	6 months	Recommendation	DBS Code of Practice
Pay records	Retention period	Status	Authority
Wages/salary records (inc. bonuses, overtime, expenses)	For as long as possible	Recommendation	Health and Safety Executive
Statutory maternity pay records	3 years after the tax year to which they relate	Requirement	The Statutory Maternity Pay (General) Regulations 1986
Statutory sick pay records	Permanently	Requirement	The Statutory Sick Pay Regulations 1982
Personnel	Retention period	Status	Authority
Income tax and National Insurance returns/records	At least 3 years after the end of the tax year to which they relate	Requirement	The Income Tax (Employments) Regulations 1993
Redundancy details, calculations of payments, refunds, notifications to Secretary of State	6 years after employment ends	Recommendation	Chartered Institute of Personnel and Development
Health and Safety	Retention period	Status	Authority
Staff accident records	3 years from date the record was made	Requirement	Social Security Regulations 1979
Records of reportable death, injury, disease or dangerous substance	3 years from the date the record was made	Requirement	RIDDOR Regulations 1995

Accident / Medical Records in accordance with COSHH	40 years from date of last entry	Requirement	COSHH Regulations 2002
Health and Safety Inspections, Records and Consultations	Permanently	Recommendation	Chartered Institute of Personnel and Development
Financial records	Retention period	Status	Authority
Accounting records	3 years from the end of the financial year for private companies, 6 years for PLC	Requirement	Companies Act 2006
Administration records	Retention period	Status	Authority
Employers' liability insurance records	For as long as possible	Recommendation	Health and Safety Executive
Minutes / minute books	10 years from the date of the meeting for companies	Requirement	Companies Act 2006
	Permanently	Recommendation	Chartered Institute of Personnel and Development