

Factsheet 6

Information sharing

As part of its work Bild ACT will necessarily be required to retain personal information. This will be done in line with our GDPR policy and under the auspices of our 'Data Controller', the Certification Director.

For very specific 'agreed purposes', Bild ACT will use such information to support our core business activities:

- To maintain our public database of certificated training services.
- To maintain our private database of key personnel.
- To fulfil our initial assessment activities and certification procedures.
- To fulfil our training/trainer surveillance during the certification cycle which is a fundamental part of our quality assurance.

The personal details will be limited to the names of the organisation contact/s, and the named senior trainers which inform our public database. These will also be held on our private PW protected database of key personnel.

Within Affiliated training organisations the requirement will be for named contacts, and associate trainers. These will be held on our private PW protected database of key personnel.

The certification co-ordinators, along with the Lead Assessor or "Data Disclosers" will share personal information on a restricted basis to fulfil our core business activity:

- Commissioning assessors to observe trainers.
- Notifying certificated training services of non-conformities or complaints.
- Sharing information with panel members for the sole purpose of evidence scrutiny.

Those individuals with whom we share the limited information will be restricted to Assessors, Panel Members and key operational personal such as Certification Co-ordinator's, Lead Assessors and the Certification Director.

All of these parties are required to sign a 'Restraint Reduction Network and Bild ACT Declaration of Interest Disclosure' and a 'Restraint Reduction Network and Bild ACT Confidentiality Declaration' every year.

We will not disclose or share personal data with third parties. There are, however, certain circumstances where the duty of confidentiality is overridden. For example, when a criminal offence has been committed or where safeguarding concerns are highlighted, and someone is at risk. Additional confidential information may be requested by a court and where it is prohibited by law, the customer will not be notified. In these circumstances Bild ACT will adhere to the law, local safeguarding instructions. Where the law permits Bild ACT will inform the training organisation within seven days of the request for this information.

In the event Certificated Training Services are no longer certificated, or Affiliate Organisations are no longer affiliated, any related personal information will be retained but designated 'not active' in the database for a period of time that is deemed reasonable by the 'Data Controller', which is to cover the re-instatement of trainers, recertification of training services. This period will not exceed 12 months.

All data management, including data sharing, will be undertaken in accordance with the UK GDPR; the Data Protection Act 2018 (DPA 2018) (and regulations made thereunder); the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended, (and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of personal data (including, without limitation, the privacy of electronic communications)); (and the guidance and codes of practice issued by the Information Commissioner or other relevant regulatory authority and applicable to a party).