Data Management Policy

Date Adopted: 17th June 2021 (Last Updated 22nd July 2022)

1. Policy Outline

Engineers Academy gathers and stores only the personal information and data relating to its subscribers, applicants and students that is relevant and necessary for their engagement on the Engineers Academy study platform, sharing this information with 3rd parties only where necessary for facilitating the participants' effective access to the platform.

As a result, this policy document aims to outline the data that is gathered for different modes of engagement on the platform, as well as to justify the purpose of such data being gathered.

Additionally, this policy document outlines the approach which Engineers Academy adopts towards the retention and disposal of data, and the expectations it places upon its own staff and any 3rd party contractors.

In order to present this information with the greatest possible clarity, this policy categorises different modes of student engagement with the Engineers Academy study platform as follows:

1.1. **Mailing List Subscribers** are those who have signed up to the Engineers Academy mailing list, to receive relevant marketing information and to receive a password for access to free sample lessons.

1.2. **Course Subscribers** are those who have either signed up to the free sample lessons using the password provided, or have signed up for a rolling, monthly, paid subscription, allowing access to a range of non-accredited bridging courses.

1.3. **Applicants** are those who have applied for a course of study towards a full, accredited qualification.

1.4. **Enrolled Students** are those who have been accepted on to a course of study towards a full, accredited qualification.

1.5. **Alumni** are those who have successfully concluded a course of study towards an accredited qualification with Engineers Academy.

1.6. **Withdrawn Students** are those who have opted to withdraw from their studies toward an accredited qualification or have been withdrawn by Engineers Academy for any reason. Those who have *unsubscribed* from the positions defined in 1.1 and 1.2 are **not** classed as withdrawn students.

2. Gathering of Data

The personal information and other data that is gathered from those engaged on the Engineers Study platform is dependent on the level of engagement defined in 1.1 – 1.6.

2.1 In the first instance, prospective students may opt to sign up to a marketing newsletter, to receive further information about Engineers Academy courses. For these

Mailing List Subscribers (1.1), only names and email addresses are gathered in order to facilitate this operation.

2.2   For **Course Subscribers** (1.2) who opt to receive free sample lessons, or purchase one of Engineers Academy's monthly, rolling subscriptions, the student's billing address is gathered, in addition to the above.

2.2.1   For **Course Subscribers** purchasing paid subscriptions, students' payment details (card details etc.) are **not** gathered by Engineers Academy for monthly subscriptions and are instead handled by an approved 3rd party: PayPal.

2.2.2   For **Course Subscribers** receiving free sample lessons only, the user must enter a valid billing address as previous, but the use of a generated product password (1.1) nullifies the amount due, and so no payment details are taken or processed.

2.2.3   Engineers Academy uses the billing address supplied for:

2.2.3.1   Accounting purposes

2.2.3.2   Ascertaining eligibility of students for courses delivered by Engineers Academy, dependant on their geographical location.

2.3   **Applicants** (1.3) for a course of study towards an accredited qualification are required to complete a secure application form, hosted by an approved 3rd party, GetResponse. This application form gathers the applicant's name, contact telephone number, email address and information relating to that student's prior qualifications and experience. This information is gathered in order to allow Engineers Academy to make an informed judgement as to whether the applicant is appropriate for the course.

2.4   Successful applicants will be invited to complete a secure online enrolment form, in order to become **Enrolled Students** (1.4). At this stage, additional personal data is required including full name and address, date of birth, proof of identity, and evidence of prior achievement, where required. The information gathered is required for its subsequent submission to the awarding body (Pearson EDEXCEL), via their secure online platform, to register that student for the qualification.

2.5   For **all** engagement types defined in points 1.2 – 1.6, the Engineers Academy gathers and retains information related to the user's academic progress on the platform, including student work, grades, as well as automatic logs which record a history of that user's actions on the platform.

3. Storage of Data

Engineers Academy are committed to storing data that is gathered in the manner outlined in Section 2 as securely and safely as possible, and by transmitting such data between approved 3rd parties only where strictly necessary.

3.1.   Engineers Academy uses remote, secure servers for all of its operations, and utilises only approved 3rd party solutions for the secure gathering and retention of data, including personal information.

3.2.   Access to data, including data pertaining to personal information, is restricted in that it can only be accessed by assessors, managers and directors of Engineers Academy who are authorised to do so. This is facilitated by the use of secure login usernames and passwords for said individuals, where such access is only granted to those individuals who have a necessary requirement to access such information.

3.3.   Engineers Academy does **not** collect, produce or retain any 'hard copies' of data that pertains to student's personal information. Only electronic copies are retained.

3.4. Engineers Academy does **not** allow the storage of data that pertains to student's personal information on any removable or portable digital medium, including – but not limited to – USB storage, CD, portable hard-drives and similar.

3.5. Engineers Academy stores any and all data that pertains to students' personal information in secure, cloud data storage, and this information is not saved 'locally' on any devices, portable or otherwise. Only those directors and managers within Engineers Academy who have a legitimate requirement to access such resources are granted the appropriate credentials to do so.

3.6. The safeguarding of any information collected is maximised by the utilisation of the following (See Section 6. for 3rd party involvement):

    3.6.1. The Engineers Academy study platform is hosted on dedicated, secure cloud servers, hosted by Ionos (ionos.co.uk), with a 99.99% uptime guarantee.

    3.6.2. The website and online study platform are encrypted using SSL certificates.

    3.6.3. All resources and data hosted online (including student work) are backed up daily and stored on separate, secure servers hosted by Adrive (adrive.com).

    3.6.4. Course **Applicants** (1.3) and **Enrolled Students** (1.4) submit an electronic application / enrolment form maintained by Get Response (getresponse.co.uk) and a copy is emailed to a director of Engineers Academy LTD (secure Ionos webmail) for review. Get Response store data in 'security-focused data centres' and Ionos webmail is also hosted within their secure data centres.

    3.6.5. Students, assessors and administrators log on to the study platform using unique usernames and passwords.

    3.6.6. Study platform 'roles' have been created for students, assessors and administrators, with necessary permissions being set accordingly. (See 5.5).

4. Retention and Disposal of Data

Engineers Academy retains some information for relevant marketing purposes, and disposes of personal data after a given period of time.

4.1. Engineers Academy adopts an approach to the retention of data that is dependent on the type of data that is gathered, as outlined in Section 2:

    4.1.1. All messages sent to the email addresses of **Mailing List Subscribers** (2.1) include an 'unsubscribe' link by default. The individual can then opt to be fully removed from both the mailing list and the Get Response database.

    4.1.2. Engineers Academy will retain the contact information provided by **Course Subscribers** (2.2) for the duration of the subscription. Order details are then archived within the online store for account keeping purposes. All Course Subscribers can request deletion from both the study platform and online shop using the 'Delete Me' option within their customer account. This revokes access to their accounts, closes those accounts and prevents any further correspondence being sent. However, historic order details are still retained.

    4.1.3. The data gathered from **Applicants** (2.3) is retained for a maximum time of 5 years. This is to allow Engineers Academy to:

        4.1.3.1. evidence the application process historically to awarding bodies and other regulatory bodies, from an Initial Advice and Guidance (IAG) perspective.

        4.1.3.2. compare applications with previous, unsuccessful applications submitted by the same applicant.

          4.1.3.3.   contact applicants to arrange an interview, or request additional information.

          4.1.3.4.   apprise successful applicants of the next steps required for enrolment.

          4.1.3.5.   inform unsuccessful applicants that they have not been successful in their application, and/or to contact these applicants to recommend alternative courses.

    4.1.4.   The data gathered from **Enrolled Students** (2.4) is retained for the duration of the study programme, plus an additional 5 years. This is in line with the expectations of the Awarding Body (Pearson EDEXCEL).

    4.1.5.   Data retained that relates to **Withdrawn Students** (1.6) is retained in a manner identical to 4.1.4.

4.2. The disposal of personal data is an automatic process in the case of **Mailing List** and **Course Subscribers** (4.1.1 and 4.1.2).

4.3. For **Applicants** (2.3) and **Enrolled Students** (2.4), personal data is deleted manually from the secure servers, by a director or manager with appropriate access credentials for said data, with the following exceptions:

    4.3.1.   **Applicants** (1.3) and **Enrolled Students** (1.4) may also (but not necessarily) be either **Mailing List** or **Course Subscribers** (1.1 and 1.2). In this instance, whilst Engineers Academy will delete personal information that is no longer required (in line with 4.1.3 and 4.1.4), those students may opt to retain their subscription (whereby Engineers Academy will retain the data gathered in 2.1 and 2.2) or unsubscribe in the manner described in 4.1.1 and 4.1.2.

    4.3.2.   **Enrolled Students** (1.4) who have successfully completed their programme of study with Engineers Academy are invited to become **Alumni** (1.5) and retain credentials which allow them to access the study platform indefinitely. These credentials are limited to names and email addresses only, whereas all other personal information is deleted in line with 4.1.4. **Alumni** can request the cancellation and deletion of their account, with its associated data, at any time.

4.4. For both **Enrolled Students** (1.4) and **Alumni** (1.5) who have completed all, or part of a Pearson EDEXCEL accredited qualification, assessment records (assignment feedback and grades, unit grades, etc.) are retained for a minimum of 3 years and the associated student work is retained for a minimum of 15 weeks, after certificates have been issued, in line with the awarding body expectations.

5. Personnel

Engineers Academy consists of three company directors, who also act as tutors and assessors on the Engineers Academy study platform. Additionally, Engineers Academy can hire assessors on a casual basis.

5.1. All Engineers Academy Directors have a commitment to continued professional development in the area of data protection, and have each received a certificate in "Data Protection Essentials: GDPR Edition", and each complete "refresher" courses periodically.

5.2. All directors and assessors are in possession of a current, valid DBS Check at the time of their first engagement with Engineers Academy. Additionally, directors make use of the DBS Update Service to ensure that these certificates are kept up-to-date.

5.3. All directors and assessors, as part of their Contract of Engagement with Engineers Academy, agree to adhere to all Engineers Academy Policies, including this policy.

5.4. Where 3rd party contractors are involved, signed declarations are provided to confirm and accept adherence to this policy (See Section 6 below).

5.5. The directors and assessors of Engineers Academy are aware of and take active steps to ensure the security of any personal electronic devices (including computers, tablets and mobile phones) which may be used in the course of business. This includes the use of firewalls and anti-virus software to prevent data compromise. Staff are also made aware of the importance of safe web browsing and the use of secure, recognised applications for business use, in order to mitigate the risk of data compromise.

5.6. The study platform has different roles assigned to students, assessors, and directors, and these roles are associated with differing privileges, allowing access to only data that is necessary. For example:

    5.6.1. Students can only see their own data and information relating to their academic progress.

    5.6.2. Assessors can see only a minimal amount of data relevant to the students that they are responsible for assessing. This data includes a name and email address, and information relating to academic progress, such as the students' work and grades.

    5.6.3. Directors have an administrative privilege that allows access to the same data as in 5.6.2, but for all students enrolled on or subscribed to the study platform.

5.7. Engineers Academy adopts a hierarchical structure for the awarding of those permissions and privileges outlined in 5.6. Namely, the CEO of Engineers Academy may award administrative privileges to other directors, and directors may award privileges to assessors as and when required.

5.8. Engineers Academy keeps a central record of those privileges and permissions that have been awarded to staff, either on the Engineers Academy study platform, or for any other platforms that are used by Engineers Academy in the course of business. These permissions are reviewed annually, or when required.

5.9. Engineers Academy facilitates an effective leaver's process for any assessors or directors who have terminated their contract with Engineers Academy insofar that the privileges outlined in 5.6.2 and 5.6.3, as well as access to organisational data, information and communications, are withdrawn. To this effect, a serving director will ensure that:

    5.9.1. Access to any accounts which facilitate access to Engineers Academy organisational data are withdrawn and/or deactivated.

    5.9.2. Access to any other servers, storage or email accounts associated with Engineers Academy are withdrawn and/or deactivated.

    5.9.3. Any privileges afforded to departing staff in the operation of software or infrastructure relating to Engineers Academy are withdrawn.

    5.9.4. Points 5.9.1, 5.9.2 and 5.9.3 are executed to coincide with the contract end-date specified, although the board of directors reserves the right to enact these revocations at an earlier date if deemed appropriate.

5.10. In instances where Engineers Academy staff use a personal computer for the day-to-day activities of the company, a separate account is created on such computers for this purpose, which does not have administrative privileges over that computer.

5.11. In instances where Engineers Academy staff opt to use a personal mobile device for the day-to-day activities of the company, the company requires that staff:

    5.11.1. Use devices which restrict available applications to only those that can be downloaded from an "app store" (Google Play Store, Microsoft Store, Apple App Store, etc.)

    5.11.2. Download and install only those apps that are on a company-held list of approved applications.

    5.11.3. Submit to the directorship any requests for apps that are not currently included on the list of approved applications.

5.12. A review process will be held annually (typically expected at the commencement of a new tax year), where all authorised personnel are required to review all programmes and cloud services, installed on devices within their control, and remove any redundant programmes and software applications (not used within a one-year period).

6. 3rd Party Involvement

Engineers Academy involves the use of 3rd parties only where necessary to facilitate a functional and secure study platform. Some of these 3rd parties offering web services – including PayPal, Ionos (formerly 1&1), Adrive and GetResponse have been mentioned in previous sections.

6.1. Engineers Academy only involves those 3rd party web-service providers that can demonstrate a suitable standard of data security which satisfy the requirements of Engineers Academy and its stakeholders. The policy documents of any of our approved 3rd party web providers can be provided upon request.

6.2. Engineers Academy utilise the services of **3E Software Solutions**, a reputable IT Services Company which is involved in the development and maintenance of the Engineers Academy website and study platform.

    6.2.1. In the course of their work, 3E Software Solutions has access to only the personal information that is relevant and necessary to facilitate the maintenance of students' accounts and access to the platform.

    6.2.2. In line with our expectations for all 3rd party providers, 3E Software Solutions provides an annual signed statement, which formalises their acknowledgement of this policy document, and their requirement to adhere to all points therein, including:

        6.2.2.1. An agreement to not disclose, share, or otherwise distribute student data, personal information, or other confidential information to any 3rd party, without written authorisation from a director of Engineers Academy.

        6.2.2.2. An agreement not to contact, directly or indirectly, any applicants, students, whether active or withdrawn, subscribers or alumni for any reason, without written authorisation from a director of Engineers Academy.

        6.2.2.3. An agreement not to store data in any location other than those locations authorised by a director of Engineers Academy.

        6.2.2.4. An agreement not to make any modifications or alterations to any of Engineers Academy's systems in place, which would reduce the safety and security of data, or would otherwise contravene any of the points in this policy document.

6.2.2.5. An agreement that no other behaviours or activities be undertaken that would otherwise contravene any points outlined in this policy document, or would otherwise harm the reputation of Engineers Academy and/or its commitment to data security.

6.3. Engineers Academy sends automated weekly progress reports by email to all **Enrolled Students** (1.4), as set out in the terms and conditions of access. These emails do not contain any personal information other than the student's first name and the percentage progress made for that week. Final grades, or any other personal information, are not sent in this automated manner.

6.4. Engineers Academy sends automated weekly progress reports to a designated officer nominated by a sponsor of **Enrolled Students** (1.4). For example, a training officer in a company or training provider. These automated reports include the full name and percentage progress of each student under the care of that officer, and allow companies or training providers to monitor the progress of students studying with Engineers Academy, whose fees are paid by that company or training provider. **Enrolled Students** accept this condition as outlined in the terms and conditions of access.