



DATA PROTECTION POLICY

As we are used to dealing with patients and highly sensitive data on a daily basis, we take Data Protection very seriously.

Data Protection Act

Under the data protection act (DPA) businesses are responsible for security, compliance and governance of their data. PRO Phlebotomy Training follows all of the below 8 principles regarding the Data Protection Act -

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless-
 - a) At least one of the conditions in Schedule 2 is met, and
 - b) In the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. About the rights of individuals e.g. personal data shall be processed in accordance with the rights of data subjects (individuals).
7. Appropriate technical and organisational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

In relation to the Data Protection Act PRO Phlebotomy Training will retain all collection records for up to 30 years.

Physical Data

All sensitive / confidential information in our building is filed away in lockable cabinets, access to these are restricted to the Training Centre Manager (TCM), Lead Internal Quality Assurer (LIQA) and Lead Assessor (LA).

Client Databases

Access to our client database is also restricted via password protection; we are prompted to change our passwords every 3 months.



Emails

PRO Phlebotomy Training office emails are accessed via one of 2 work laptops, which are never left in the building overnight, this is to ensure safety and security of sensitive data.

How do we use Learner information?

We collect email contact details on the Course Application Form. We use these contact details to stay in touch with the Learner throughout the course. We will only use these details to contact the Learner about matters regarding the course this form relates to.

We collect the Learner's details again on the Course Feedback Form (**IP-009-CFF**). Here the Learner has the option to choose how and why we are able to use their contact details:

- To get further information about their feedback.
- To send them our quarterly email, with news and information from PRO Phlebotomy Training, and from the field of Phlebotomy.
- To inform them about other courses that we are running, which might benefit their Continued Professional Development.

In this instance, the Learner can choose to not leave their contact details at all.

Who do we share your information with?

We will share some information, like the Learner's name, Unique Learner Number and results, with our Awarding Body, so that they can issue the certificate.

We will not share any other information with any other third parties.

REVIEWING THIS POLICY

Contacts

If there are any queries about the contents of the policy, please contact the PRO Phlebotomy Training Centre on 01332 380 777 or by emailing info@PROPhlebotomyTraining.co.uk.

Reviews

The Senior Management Team reviews this policy at least annually during the bi-annual Service Review Meetings.

Last reviewed: 1st November 2025

Declaration

This policy has been reviewed and approved by the Senior Management Team:

SIGNED:		DATE:	01/11/2025
NAME:	Kim Cockerham	POSITION:	Training Centre Manager