

Document Title

UKROEd Privacy Notice

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Document Descriptor

UKROEd collects and processes personal data of external parties during the course of its operational activities. The Privacy Notice informs these external parties of their rights in relation to their personal data.

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1. Overview

UKROEd Limited (UKROEd) is a not-for-profit trading subsidiary of the Road Safety Trust. Our organisation's primary objective is to manage the UK's National Driver Offender Retraining Scheme (NDORS) on behalf of the Police.

As a UK based organisation, we have a legal responsibility to comply with UK Data Protection laws, including; the UK version of the General Data Protection Regulation (UK GDPR), Data Protection Act 2018 (DPA) and Data (Use and Access) Act 2025. One of the requirements of the UK GDPR is to provide individuals with information on how UKROEd uses personal data. This privacy notice aims to meet that legal requirement.

This Privacy Notice was last reviewed September 2026.

2. Terminology

This privacy notice uses terminology that is defined in the UK GDPR. Examples include 'personal data', 'processing', 'data subject', etc.

'We' or 'us' refers to UKROEd. 'You' or 'your' refers to the reader, the intended audience of this privacy notice (external data subjects of UKROEd such as email subscribers, suppliers, trainers for NDORS courses, etc.).

3. Scope

This Privacy Notice provides information on UKROEd's external data subjects, e.g., Email Subscribers and Interested Stakeholders (e.g. Police, Academics, & Researchers), Suppliers, NDORS Course Providers, NDORS course Trainers & Assessors, Website Visitors and Members of the Public. It does not cover UKROEd's internal data subjects; Employees, contractors, temporary staff & directors; or recruitment candidates. It also does not cover NDORS course participants.

UKROEd has other privacy notices for other data subject types:

- [DORS+ \(course booking portal\) Privacy Notice](#) - For individuals who attend an NDORS course as a participant.
- Employee Privacy Notice - For internal staff, please see the internal policy area, or speak with your line manager.
- Recruitment Privacy Notice - For Recruitment candidates, the privacy notice is provided on the job specification, or you can request it from the Hiring Manager.

Please also see our cookies notices for website use:

- UKROEd Website Cookie Notice
- [DORS+ Cookie Notice](#)

The following privacy notice has been split into sections depending on the type of data subject. One or multiple categories may apply to your specific circumstances.

3.1 Email Subscribers and Interested Stakeholders

This section applies to individuals who have subscribed to the UKROEd mailing list, interested stakeholders (Police, Academics & Researchers), and to individuals who attend UKROEd events.

Why we collect your information and what lawful basis we rely upon

UKROEd collects your personal data in order to provide you with information about UKROEd and the NDORS, deliver news/information updates, gather feedback and support your attendance at our events.

Below is a list of the processing activities that occur on a frequent basis and our UK-GDPR Article 6 lawful basis for processing this data.

- **Stakeholder Customer Relationship Management System (Legitimate Interests)** - Managing contact data for UKROEd Stakeholders in a Customer Relationship Management (CRM) system.
- **Police Force and Provider Engagement (Legitimate Interests)** - Planning and scheduling in-person visits to police forces and providers as part of scheme monitoring and engagement.
- **Event Organisation (Consent)** - Organising and planning events for UKROEd. This includes both online and in-person events.
- **Event Data Management (Consent)** - The collection and storage of contact data belonging to individuals who UKROEd meet at marketing and engagement events. This includes events that we attend and events that UKROEd have hosted.
- **e-Bulletin (Consent)** - Distributing engagement material and administration alerts (e.g IT outages) to individuals who have subscribed to UKROEd correspondence. The material relates to the latest news from UKROEd.
- **Commissioning Evaluations (Course Development Research) (Legitimate Interests)** - Collecting feedback from police forces to better understand their referral requirements.

Where we obtain your information from

For the majority of cases, we collect your personal data directly from you. In some instances, your professional colleagues may have passed your data onto UKROEd or we may have obtained your work contact details after networking with you at a previous event or online.

Who we share your personal data with

In order to provide our service, your personal data may be sent to the following third parties:

- Microsoft
- The software developer of, and cloud provider for, our self-hosted management application (MApp)
- Various event specific third parties (e.g. conference host, venue, caterer, etc.)
- Feedback survey management tools

If you need more specific information on these transfers, please contact us at data.protection@ukroed.org.uk

Depending on the third party that data is transferred to, your information may be sent outside of the UK. In these instances, UKROEd will ensure that the appropriate transfer mechanism and safeguards have been applied and any relevant contracts are UK-GDPR compliant.

How long we keep your information

We only keep your information for as long as necessary to fulfil the purpose of processing. Information may be deleted at the time the retention period ends or at a set review date that year. The majority of our data processing activities fall within the below categories; however, for some less frequent data processing activities we may have a different period. For more information on these other retention schedules, please contact us at data.protection@ukroed.org.uk

- **Default Retention Schedule** – For data which does not fit into another category, data is kept for 7 years after the data entry was created, at which point it is reviewed for further retention, deletion, or archiving.
- **Communications Data** – For any data relating to email subscribers/interested parties, data will be held for 5 years after the email sign-up date, at which point, you will receive an email notification requesting consent to remain on our mailing list. If you accept, your subscription will be renewed for a further 5 years. If you do not respond (or unsubscribe) your data will be removed from our mailing list.
- **Event Hosting Data** – For any data relating to events that UKROEd have hosted (attendees, dietary requirements, health accommodations, etc.), data will be kept for 1 year after the date of the event, at which point, data will be deleted.

If you receive our e-bulletin and would like to unsubscribe, please click unsubscribe at the end of the email or reach out to data.protection@ukroed.org.uk.

3.2 Suppliers

This section applies to individuals who are suppliers or employees of suppliers to UKROEd.

Why we collect your information and what lawful basis we rely upon

UKROEd collects your personal data in order to utilise the service you or your company provide.

Below is a list of the processing activities that occur on a frequent basis and our UK-GDPR Article 6 lawful basis for processing this data.

- **Accounts Payable (Contract)** - Management and payment of employee expenses, and supplier invoices (particularly where suppliers are sole traders).
- **Supplier Onboarding (Contract)** - Onboarding of new suppliers. This involves collecting personal data from suppliers for the first time in order to perform background checks and bank checks.
- **External Auditor Engagements (Legal Obligation)** - Providing personal data of employees and suppliers to external auditors in order to pass any legally required audits (e.g. from the charity commissioner).
- **Key Supplier Due Diligence (Legitimate Interests)** - Conducting annual key supplier due diligence. This process occasionally involves personal data as part of reviewing environmental social governance (ESG) statements, modern slavery statements, and equality diversity and inclusion (EDI) statements.
- **Accident Management (Legal Obligation)** - Recording any accidents/near misses that have occurred to members of staff, suppliers, or associates working on UKROEd's behalf. Accidents are recorded in an 'Accident Register'.
- **Business Continuity Plans (BCP) (Legitimate Interests)** - UKROEd conducts 'Business Impact Analysis (BIA)' for departments and identifies any potential critical incidents. These are recorded in the BIA register to be mitigated and for plans to be created. This register includes key contacts for BCP activities.
- **Duty Managers (Legitimate Interests)** - UKROEd operate a duty manager system which aims to improve the safety of staff and suppliers working in our offices; this includes a 'duty manager pack'. The pack includes a list of all UKROEd staff and suppliers who work in-person, in our office, along with their phone numbers and any associates.
- **Office Access Logs (Legitimate Interests)** - Logs of staff and visitor access to the UKROEd office which are obtained from the visitors book.

For some data processing activities that UKROEd undertakes, you may have a statutory or contractual requirement to provide UKROEd with your personal data. In these instances, if you decide not to provide UKROEd with your personal data, this may have consequences. For example, we may not be able to onboard you as a supplier.

Where we obtain your information from

We collect your personal data directly from you or from your organisation.

Who we share your personal data with

In order to provide our service, your personal data may be sent to the following third parties
Microsoft 365

- Accounting and financial management software
- Banks
- Financial auditors
- Government organisations (e.g. HMRC, Charity Commission).
- Office facility partners and office keycard access software

If you need more specific information on these transfers, please contact us at data.protection@ukroed.org.uk

Depending on the third party that data is transferred to, your information may be sent outside of the UK. In these instances, UKROEd will ensure that the appropriate transfer mechanism and safeguards have been applied and any relevant contracts are UK-GDPR compliant.

How long we keep your information

We only keep your information for as long as necessary to fulfil the purpose of processing. Information may be deleted at the time the retention period ends or at a set review date that year. The majority of our data processing activities fall within the below categories; however, for some less frequent data processing activities we may have a different period. For more information on these other retention schedules, please contact us at data.protection@ukroed.org.uk

- **Default Retention Schedule** – For data which does not fit into another category, data is kept for 7 years after the data entry was created, at which point it is reviewed for further retention, deletion, or archiving.
- **Supplier Records** – For any data relating to a supplier or contractor, data is kept for 6 years after the end of contract, at which point all data is deleted.
- **Financial Records** – For any financial related data such as tax records, invoices, etc., data is kept for 6 years after the end of the financial year, at which point, data is deleted.
- **Supplier Due Diligence** – On completion of supplier due diligence, data is kept for 1 year at which point, data is deleted.
- **Office records** – If you complete work in person, in our office, your information may be held within our Visitors book, accident records and duty manager packs. The pack includes a list of all UKROEd staff and suppliers who work in-person, in our office, along with their phone numbers and any associates. Duty Manager Packs are reviewed and updated every year with suppliers removed when no-longer relevant. Accident records are kept for 3 years after the date of the accident, at which point, data is aggregated and individual data is deleted.

- **Risk & Business Impact Analysis** – for data stored in emergency/business continuity plans, data is kept until the next review cycle of the relevant document, at which point personal data is replaced by a suitable alternative individual.

3.3 NDORS Course Providers, Trainers, Instructors & Assessors

This section applies to individuals who are NDORS Course Providers, trainers, instructors or assessors.

Why we collect your information and what lawful basis we rely upon

We process your personal data in order to be able to issue licences, provide the DORS+ and MApp platforms and to facilitate the booking of courses. Below is a list of the processing activities that occur on a regular or frequent basis. The brackets indicate the most applicable UK-GDPR Article 6 lawful basis that UKROEd relies on for this processing activity.

- **Account (ID) Management (Legitimate Interests)** - The enrolment and management of UKROEd IT accounts, including access control. This includes access to file storage systems, instant messaging systems and email management.
- **Interaction Data & Security Logs (Legitimate Interests)** - Recording and storage of interaction data for the purposes of IT & security management. This includes log in dates and times, files and systems accessed, etc.
- **UKROEd IT Backups (Legitimate Interests)** - The storage and management of IT backups for internal systems & the company website.
- **DORS+ User Account Administration (Internal) (Public Interest)** - The process of creating internal user accounts for UKROEd key stakeholders (Police, Course Providers, Suppliers, & staff) and the administration of external user accounts (i.e. course attendees).
- **Course Scheduling (Public Interest)** - Allowing Course Providers to schedule Course dates and assign Trainers to them. The availability of Courses are visible to users.
- **Account Activity Logging (Public Interest)** - The logging of DORS+ users' activities within the software system. This tracks activities such as log in dates and times, which data has been viewed, and data modifications. This is used for the purposes of transparency, security monitoring and security auditing.
- **Generating Reports (Public Interest)** - UKROEd, the Police Forces and Course Providers can aggregate data within DORS+ to create anonymous data and statistics.
- **Trainer CRM System (Legitimate Interests)** - Managing contact and lifecycle data for UKROEd Trainers in a Customer Relationship Management (CRM) system.
- **Trainer Licences (Contract)** - The management and storage of trainer licence agreements which sets out the obligations and responsibilities of a trainer in delivering courses.
- **Course Piloting (Public Interest)** - Testing new course material by inviting members of the public to attend and provide feedback. Individuals are invited via a third-party market research organisation.

- **Training Delivery (Legitimate Interests)** - Training Trainers on how to deliver an NDORS course. Training is provided to Trainers, Instructors, Internal Monitors, and Assessors. Training includes continuous professional development interventions to support scheme stakeholders.
- **Assessment of Training (Legitimate Interests)** - Observing Trainers delivering live courses and assessing their performance to ensure that it meets the standards required by UKROEd. This also includes assessment of the Assessors (internal quality assurance observations). As a consequence of not meeting these standards, Trainers or Assessors can be referred to professional standards and licencing.
- **Annual Provider Review (APR) process (Legitimate Interests)** - The receipt of personal data from course providers as part of their Annual Provider Review. UKROEd requests redacted evidence for this activity, but some Course Providers provide (limited) unredacted personal data.

For some data processing activities that UKROEd undertakes, you may have a statutory or contractual requirement to provide UKROEd with your personal data. In these instances, if you decide not to provide UKROEd with your personal data, this may have consequences. For example, we may not allow you to deliver NDORS courses which may void our contract with you.

Where we obtain your information from

UKROEd will collect your personal data directly from you, through correspondence or submitted via the MApp portal. In some instances, your professional colleagues may have passed your data onto UKROEd.

For Trainers, your information will be collected from you and from your course provider during the onboarding process. You will be given an opportunity to review the information that has been submitted about you.

Who we share your personal data with

In order to provide our service, your personal data may be sent to the following third parties

- Microsoft
- Learning Management Systems for staff training
- Cybersecurity software & consultants
- The software developer of, and cloud provider for the UKROEd software MApp and DORs+

If you need more specific information on these transfers, please contact us at data.protection@ukroed.org.uk

Depending on the third party that data is transferred to, your information may be sent outside of the UK. In these instances, UKROEd will ensure that the appropriate transfer mechanism and safeguards have been applied and any relevant contracts are UK-GDPR compliant.

How long we keep your information

We only keep your information for as long as necessary to fulfil the purpose of processing. Information may be deleted at the time the retention period ends or at a set review date that year. The majority of our data processing activities fall within the below categories; however, for some less frequent data processing activities we may have a different period. For more information on these other retention schedules, please contact us at data.protection@ukroed.org.uk

- **Default Retention Schedule** – For data which does not fit into another category, data is kept for 7 years after the data entry was created, at which point it is reviewed for further retention, deletion, or archiving.
- **Account (ID) Management** – For any data associated with a UKROEd email account, data is held for 90 days after the account is disabled, at which point, personal data associated with the account is deleted, emails and files associated with the account are reviewed for archiving or deletion.
- **Instant Messaging** – Messages are kept for 30 days after a message is sent or received at which point, data is deleted.
- **Interaction Data** – For any interaction data associated with security logs, data is kept for 90 days after the event occurrence, at which point, data is deleted.
- **IT Backups** – IT backups are kept for 1 year after the date of the last backup, at which point, data is deleted.
- **DORS+ Staff, Police & Course Provider User Accounts** – For any DORS+ staff account, data is held for 4 years after a user account is disabled (i.e. a user leaves the relevant UKROEd/police/supplier organisation), at which point, the account data is deleted.
- **DORS+ Logging Data** – For any Staff User action on DORS+, data is kept for 6 years after the date of the activity, at which point, data is deleted. Data may be deleted earlier if another shorter retention schedule applies (e.g. a DORS+ Staff User makes a change to a Course Attendee's account and that Course Attendee account is deleted after 3.5 years).
- **Trainer, Instructor and Assessor records** – Trainer, Instructor and Assessor records are held in MApp and kept for 6 years after offboarding. Trainers who never completed onboarding who are deleted from the system after 7 days
- **Course provider Records** – Course provider data is kept for 6 years after the end of licence, at which point all data is deleted. Course provider staff records and accounts are deleted after 6 months of leaving post.
- **Course Scheduling** - For any data relating to an NDORS course that has been scheduled, data is kept for 6 years after the date of the course, at which point, data is deleted.
- **Trainer Agreements** – For any data associated with a trainer licence agreement, data is kept for 4 months after the Trainer's status is revoked or becomes inactive, at which point, data is deleted.

3.4 UKROEd Website Visitors

This section applies to individuals who visit the UKROEd website. We have a separate Cookie Statement for the UKROEd website.

Why we collect your information and what lawful basis we rely upon

We process your personal data in order to provide you with requested information and services and to administer our site including:

- troubleshooting and statistical purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- security and debugging as part of our efforts to keep our site safe and secure.

Below is a list of the processing activities that occur on a regular or frequent basis. The brackets indicate the most applicable UK-GDPR Article 6 lawful basis that UKROEd relies on for this processing activity.

- **Public Enquiries (Legitimate Interests)** - Receiving and responding to enquiries from the general public about NDORS/UKROEd matters. Correspondence is received into a central shared email inbox.
- **Website Cookies (Essential) (Legitimate Interests)** - The use of website cookies and related data on the UKROEd website that are necessary for the core functioning of the website.
- **Website Cookies (Non-Essential) (Consent)** - The use of website cookies and related data on the UKROEd website that are not necessary for the core functioning of the website. This includes statistics, advertising, and social media cookies. Please see our cookies statement for more information.

Where we obtain your information from

UKROEd will collect your personal data directly from you when you fill out forms on our website. Our website automatically collects information from you such as:

- technical information, including a truncated and anonymised version of your Internet protocol (IP) address, IP location data, browser type and version, operating system, and platform;
- information about your visit, including what pages you visit, how long you are on the site, how you got to the site (including date and time); page response times, length of visit, what you click on, documents downloaded and download errors.

Who we share your personal data with

In order to provide our service, your personal data may be sent to the following third parties:

- Website developers & hosts
- Microsoft
- Course Providers
- Third party cookie providers (see our Cookie statement for more information)

If you need more specific information on these transfers, please contact us at data.protection@ukroed.org.uk

Depending on the third party that data is transferred to, your information may be sent outside of the UK. In these instances, UKROEd will ensure that the appropriate transfer mechanism and safeguards have been applied and any relevant contracts are UK-GDPR compliant.

Our site may, from time to time, contain links to and from the third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

How long we keep your information

We only keep your information for as long as necessary to fulfil the purpose of processing. Information may be deleted at the time the retention period ends or at a set review date that year. The majority of our data processing activities fall within the below categories; however, for some less frequent data processing activities we may have a different period. For more information on these other retention schedules, please contact us at data.protection@ukroed.org.uk

- **Default Retention Schedule** – For data which does not fit into another category, data is kept for 7 years after the data entry was created, at which point it is reviewed for further retention, deletion, or archiving.
- **Web Cookies** – Please see our cookie management system.
- **Public Enquires Mailbox** – For general Public Enquires mailbox, data is held for 6 months after the date of email receipt, at which point, data is deleted. If your enquiry contains a request based in law such as a Data Subject Rights request, this will be held in line with our retention for these requests.

4. Your rights

Under the UK GDPR, you have rights that you may exercise at any time. UKROEd will consider your request and respond in line with the legislation. Each right has requirements and exemptions that are associated with them and your request may not be able to be fulfilled. For further information, please visit the Information Commissioner's Office (ICO) website: <https://ico.org.uk>

1. **The Right to be Informed** – You have the right to be informed about how UKROEd uses your personal data. Typically, UKROEd will provide this information to you in privacy notices such as this one.
2. **The Right of Access** – You have the right to request a copy of the personal data that UKROEd holds about you.
3. **The Right to Rectification** – If UKROEd holds personal data about you that is inaccurate or outdated, you have the right to request that this information is changed.
4. **The Right to Erasure** – You have the right to request that UKROEd deletes personal data that relates to you.
5. **The Right to Restrict Processing** – You have the right to request that UKROEd restricts or suppresses the further processing of your personal data.
6. **The Right to Data Portability** – You have the right to request that UKROEd provide a copy of your personal data to you in a commonly used digital format.
7. **The Right to Object** – You have the right to object to specific processing activities that UKROEd undertakes. Where UKROEd has relied on consent as a UK GDPR Article 6 lawful basis or an Article 9 exemption, you have the right to withdraw this consent at any time. When you withdraw your consent for data processing, UKROEd will make reasonable efforts to stop the associated processing activity as soon as possible.
8. **Rights in Relation to Automated Decision-Making Including Profiling** – Where UKROEd uses IT systems to make decisions about you (with no human involvement or oversight), you have UK GDPR rights in relation to this. These rights include the ability to request for human intervention to challenge a computer made decision, or to request a check that an automated system is working as intended. Currently, UKROEd does not carry out any automated decision making or profiling.

Right to lodge a complaint

You have the right to make a data protection complaint to UKROEd regarding our processing of your personal data. Please send any data protection complaints to data.protection@ukroed.org.uk

If you have concerns about the way UKROEd processes personal data you can make a complaint to the Information Commissioners Office (ICO) They can be contacted via:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF
Tel: 0303 123 1113

5. Contact UKROEd

If you have any questions or comments regarding the content of this Privacy Notice, please contact:

data.protection@ukroed.org.uk

Or alternatively:

First Floor of Colwyn Chambers,
19 York Street,
Manchester,
M2 3BA

UKROEd has appointed a Data Protection Officer. They can be contacted here:

Name: Joe Morgan

Email: DPO@ukroed.org.uk