



Data Protection Policy

Aims of the Policy

GlobeUs Training Ltd needs to keep certain information on its employees, volunteers, service users and customers to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 1998. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers employed staff, trustees, volunteers, third parties and customers where applicable. It runs in conjunction with the privacy Policy.

Definitions

In line with the Data Protection Act 1998 principles, GlobeUs Training Ltd will ensure that personal data will:

- Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be processed in accordance with the rights of data subjects
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful and in accordance with the DPA's eight data protection principles. Personal data should only be used for the purposes agreed by the data subject. If personal data is to be shared with a third party or used for another purpose, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data and who has used this data.

Stewardship: Those collecting personal data have a duty of care to protect this data throughout the data life span.

Type of information processed

- GlobeUs Training Ltd processes the following personal information: Information on applicants for posts, including references
- Employee information – contact details, bank account number, payroll information, supervision and appraisal notes.
- Customers (See privacy policy)

Personal information is kept in the following forms: Paper based and electronic.

Groups of people within the organisation who will process personal information are: employed staff and approved third parties.

Notification

The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires.

If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is Luke Bailey

Responsibilities

The governing body delegates tasks to the Data Controller. The Data Controller is responsible for:

- understanding and communicating obligations under the Act
- identifying potential problem areas or risks
- producing clear and effective procedures
- notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes

All employed staff, trustees, volunteers and third parties who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy will result in disciplinary proceedings.

Policy Implementation

To meet our responsibilities GlobeUs Training Ltd will:

- Ensure any personal data is collected in a fair and lawful way;
- Explain why it is needed at the start;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

We will ensure that:

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff, volunteer or service user, knows what to do;
- Any disclosure of personal data will be in line with our procedures.

Queries about handling personal information will be dealt with swiftly and politely.

Training

Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:

On induction and ongoing general training/ awareness raising through meetings, performance reviews and company updates.

Gathering and checking information

Personal sensitive information will not be used apart from the exact purpose for which permission was given.

Data Security

- The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken: Using lockable cupboards (restricted access to keys)
- Password protection on personal information files
- Setting up computer systems to allow restricted access to certain areas
- If personal data is taken off site, appropriate measures for its protection must be followed i.e. encrypted memory sticks, laptops not left unattended.
- Password protected attachments for sensitive personal information sent by email

Any unauthorised disclosure of personal data to a third party by an employee may result in disciplinary proceedings.

Any unauthorised disclosure of personal data to a third party by a volunteer or trustee may result in *The Board and trustees are accountable for compliance of this policy. A trustee could be personally liable for any penalty arising from a breach that they have made.*

Any unauthorised disclosure made by a volunteer may result in the termination of the volunteering agreement.

Subject Access Requests

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the Act to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to Luke Bailey, GlobeUs Training Ltd, Unit 14 Basepoint Gosport, Aerodrome Rd, Gosport, and Hampshire. PO13 0FQ 01239 848714 luke.bailey@globeustraining.com

We may make a small charge on each occasion access is requested.

The following information may be required before access is granted:

Specific details of information required to include –

- Full name and contact details of the person making the request
- Proof of identity before access is granted. The following types of ID will be required: (e.g. passport, birth certificate etc.)

- their relationship with the organisation (former/ current member of staff, trustee or other volunteer, service user)
- Any other relevant information- e.g. timescales involved

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 40 days required by the Act from receiving the written request

Review

This policy will be reviewed at intervals of 12 months to ensure it remains up to date and compliant with the law.

Issue	Issue Date	Author	Revision Notes
1	01/12/2015	Luke Bailey	1st Issue
2	16/05/2016	Ellen Mould	Reviewed policy
3	16/11/2016	Ellen Mould	Reviewed and checked
4	22/01/2018	Ellen Mould	Reviewed and checked