

P&I Training Ltd

Data Protection Policy

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Policy Statement

1.0 P&I TRAINING LTD fully understands its obligations to ensure that personal information is treated fairly, lawfully and correctly, and is committed to achieving compliance with the laws of the Data Protection Act (DPA) 1998.

2.0 The DPA sets out the rules for how organisations must process personal data and sensitive personal data about living individuals. It gives individuals the right to find out what personal data is held about them by organisations (electronically, and/or within a manual filing system) and to see and correct any personal data held.

3.0 P&I TRAINING LTD needs to collect and process personal data about people, including staff and individuals with whom it deals with, in order to operate its daily business and for the organisation to operate effectively.

4.0 P&I TRAINING LTD is committed to ensuring that staff are appropriately trained and supported to achieve compliance with the DPA. This is regarded by P&I TRAINING LTD as being very important in maintaining the confidence between them and with those whose personal data they hold.

5.0 P&I TRAINING LTD fully endorses and adheres to the Data Protection Principles stated below. The Eight Principles of the Data Protection Act

P1: Personal data must be fairly and lawfully processed, and in particular, shall not be processed unless specific conditions² under Schedule 2 and Schedule 3 of the Act are met.

P2: Personal data shall be obtained and used for one or more specified and lawful purposes, and shall not be processed in any manner incompatible with that purpose or purposes.

P3: Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

P4: Personal data shall be accurate and kept up to date.

P5: Personal data shall not be kept for longer than is necessary for the purpose or purposes it was collected for.

P6: Personal data shall be processed in line with the individuals' rights

1 The Data Protection Act 1988 and subsequent amendment can be found at:
<http://www.legislation.gov.uk/ukpga/1998/29/contents>

P7: Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

P8: 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 their personal data.

Scope of Policy

6.0 This policy has been written within the guidelines of relevant authoritative bodies and related documentation.

7.0 Definitions and terms used throughout this policy are defined within the guidelines of relevant authoritative bodies and related documentation.

8.0 This policy applies to all personal data and sensitive personal data collected and processed by P&I TRAINING LTD in the conduct of its business, in electronic format in any medium and within structured paper filing systems.

9.0 This policy applies to all P&I TRAINING LTD employees, whether permanent, temporary, contractors, consultants or seconders (hereafter referred to as 'staff').

10.0 This policy applies to all P&I TRAINING LTD staff, including those with which P&I operate with or deal with under any 3rd party agreements.

11.0 Disciplinary action may be taken against staff failing to comply with this policy. Failing to comply with the terms of the data protection act may result in legal action being taken against the individual and/or the organisation.

12.0 P&I TRAINING LTD is the Data Controller of, and registered with the Information Commissioner's Office (ICO) – registration number ZA300155, for collecting and using personal data about:

- members of P&I TRAINING LTD councils, boards, committees and peer review boards
- past, current and prospective employees
- suppliers, consultants, external business partners and other third parties with whom P&I TRAINING LTD communicates other persons as required by law
- Members of staff undertaking personal training

13.0 P&I TRAINING LTD places a duty of responsibility on members of the P&I TRAINING LTD research community, such as committee members and reviewers, to respect the requirement for confidentiality on receipt of confidential papers or correspondence containing P&I TRAINING LTD personal data.

terms and conditions in compliance with this policy, relative to their official capacity with P&I TRAINING LTD membership.

14.0 P&I TRAINING LTD requires that all staff ensure that a formal contract is in place (signed Data Sharing agreement), between P&I TRAINING LTD and all third parties before data can be shared with other organisations or persons for processing purposes.

15.0 P&I TRAINING LTD is registered with the ICO to process personal data for the following specified purposes:

- Staff Administration
- Advertising, Marketing and Public Relations
- Accounts and Records
- Consultancy and Advisory Services
- Crime Prevention and Prosecution of Offenders
- Research

16.0 A further description of each purpose can be found on the ICO Website by quoting the Registration Number ZA300155

Policy Objectives

17.0 The objectives of this policy are to ensure that:

- proper procedures are in place for the processing and management of personal data
- there is someone within the organisation who has specific responsibility and knowledge about data protection compliance.
- a better and supportive environment and culture of best practice processing of personal data is provided for staff
- all staff understand their responsibilities when processing personal data, and that methods of handling that information are clearly understood
- individuals wishing to submit a Subject Access Request are fully aware of how to do this and who to contact
- Subject Access Requests are dealt with promptly and courteously
- individuals are assured that their personal data is processed in accordance with the data protection principles, that their data is secure at all times and safe from unauthorised access, alteration, use or loss
- other organisations with whom P&I TRAINING LTD data needs to be shared or transferred, meet compliance requirements
- any new systems being implemented are assessed on whether they will hold personal data, whether the system presents any risks, damage or impact to individuals' data and that it meets this policy

18.0 Policy Principles

In order to meet the requirements of the 8 principles of the DPA, P&I TRAINING LTD adheres to the following values when processing personal data:

- Fair Collection and Processing
- The specific conditions contained in Schedules 2 and 3 of the DPA regarding the fair collection and use of personal data will be fully complied with.
- Individuals will be made aware that their information has been collected, and the intended use of the data specified either on collection or at the earliest opportunity following collection. This may be verbally, written or through electronic direction to the P&I TRAINING LTD

19.0 Privacy Notice.

- Personal data will be collected and processed only to the extent that it is needed to fulfil business needs or legal requirements.
- Personal data held will be kept up to date and accurate.
- Retention of personal data will be appraised and risk assessed to determine and meet business needs and legal requirements, with the appropriate retention schedules applied to that data.
- Personal data will be processed in accordance with the rights of the individuals about whom the personal data are held.

- Individuals whose personal information is held on a P&I TRAINING LTD Contacts Database will be provided with the option to 'opt out' of receiving event invitations and future communications.
- A 'cease processing request' from an individual will be acknowledged within 3 working days, with the final response within 21 days.

20.0 The final response will state whether P&I TRAINING LTD intend to comply with the request and to what extent, or will state the reasons why it is felt the requestor's notice is unjustified.

- Staff will advise the Data Protection Officer in the event of any intended new purposes for processing personal data. No new purpose for processing data will take place until the ICO has been notified of the relevant new purpose and the data subjects have been informed, or in the case of sensitive data, their consent has been obtained.

21.0 Security

Appropriate technical, organisational and administrative security measures to safeguard personal data will be in place.

- Staff will report any actual, near miss, or suspected data breaches to P&I TRAINING LTD Data Protection Officer for investigation. Data protection officer Alan Robson email: alanrobson@panditraining.co.uk Lessons learnt during the investigation of breaches will be relayed to those processing information to enable necessary improvements to be made.
- Any unauthorised use of IT services and communication facilities by staff, including sending of sensitive or personal data to unauthorised persons, or use that brings P&I TRAINING LTD into disrepute will be regarded as a breach of this policy.
- Staff will use appropriate security to protect and secure any document containing personal information.
- An Information Asset Register will be maintained identifying personal data held at Swindon Office, where it is held, how it is processed and who has access to it.
- Data Protection Awareness Training will be provided to staff to keep them better informed of relevant legislation and guidance regarding the processing of personal information.
- There is a member of staff within P&I TRAINING LTD Office who has specific responsibility for data protection, covering all aspects within the scope of this policy. Alan Robson – director alanrobson@panditraining.co.uk

22.0 Data Sharing

- Personal data will not be transferred outside the European Economic Area unless that country or territory can ensure a suitable level of protection for the rights and freedoms of the data subjects in relation to the processing of their personal data.
- Personal data in any format will not be shared with a third party organisation without a valid business reason, a signed Data Sharing Agreement in place, or without the data subjects' consent. The Data Sharing agreement will be drafted by the Data Protection Officer and the Security Officer to ensure that all P&I TRAINING LTD security requirements are addressed in the contract.

- P&I Training LTD does not have any current 3rd party agreements in place.

Staff are required to ensure that they understand and use all Security Classifications correctly.

23.0 Complaints.

Any complaints regarding data protection can be made following the P&I Training LTD complaints policy.