

Policy title	Data Protection Policy
Issue date (m/y)	03/2012
Author	Laura Cook, Director
Approved by	Donna Welburn, Operations Manager
Last review	05/2018
Review date (m/y)	08/2019

Context and /or Aims

To carry out its statutory and administrative functions The Learning Support Centre Ltd collect, hold and process personal information relating to many categories of people (data subjects) including clients, employees, applicants to work and suppliers. We recognise the right to confidentiality and security of personal information and therefore take all reasonable steps to comply with the principles of the Data Protection Act 1998, General Data Protection Regulation (GDPR) 2018 and Human Rights Act 1998 (article 8), see related documents.

Policy Statement

This policy applies to all personal data held by The Learning Support Centre Ltd irrespective of whether it is held on manual or electronic media.

The Learning Support Centre Ltd will only process and hold personal data for those purposes notified to the Information Commissioner.

We will only hold data if we have a legal basis to hold it (Article 6 Lawful Process, see related documents).

The Learning Support Centre will not disclose personal data to any third party, save where required by law or statutory obligations.

Information may be passed to third parties is made in limited circumstances by request and consent of the data subject only.

Personal data is not kept longer than necessary and is outlined in our consent forms sent to data subjects.

The Learning Support Centre Ltd seek to provide a high standard of security for all personal data whether it is stored on computer, cloud or in alternative filing systems.

Requirements for Implementation

The Learning Support Centre Ltd will perform on an annual a data audit of all non-automated filing and information systems.

This audit will enable the company to maintain an inventory of data systems in use within the organisation and ensure data is accurate and up to date.

In deciding if a data store is a relevant filing system criterion will be applied, namely:

- Information is grouped by theme;
- Information is structured by reference to name, number or other mechanism such as type of job or section;
- Information is structured to enable easy access to information about individuals by authorised personal only;

Training

All staff working for The Learning Support Centre have Data Protection Training. The management team is committed to this policy and proactive in ensuring it is adhered to.

Processing data

The Learning Support Centre Ltd receive data from third parties and data subjects directly, at which point we establish a lawful basis and request explicit consent from the data subject. To remain transparent our consent forms, outline what data we collect and on what basis we process it for and why. If we want to process the data for additional purposes, we send an additional request for permission.

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Access to data

Access to personal data is on a need to know basis and unlawful access to and /or disclosure of personal data is prohibited.

Office-based employees have data access rights determined by their job description. None office-based staff do not have network access rights.

All IT equipment is password protected with unique, individual passwords, passwords are changed by users monthly and are prompted.

Data storage and disposal

All manual data must be stored in locked cabinets and not left on unoccupied desks. Electronic data is stored on password protected database and is only accessible to authorised users. Manual data must be shredded and dealt with as confidential waste. Electronic data will be deleted permanently or archived in line with the above.

Subcontractors

All subcontractors sign a data sharing agreement and consent to share is sought by the data subject. Transfer of data is done via password protected database or files.

Dealing with a data breach

It is important all actual or suspected data breaches should be reported. Please notify Laura Cook immediately. Immediate responses are required so the impact of any data breach can be mitigated.

Named Data Protection Officer Laura Cook

Related Documents

[The Data Protection Act](#)

[Guide to the General Data Protection Regulation \(GDPR\)](#)

Data Protection A Guide For Staff

Confidentiality and Information Sharing Policy and Procedure

GDPR Explicit Consent to hold, process and share data for staff

GDPR Explicit Consent to hold, process and share data for clients

GDPR Explicit Consent to hold, process and share data for job applicants

HR Data Processing Impact Assessment

Client Data Processing Impact Assessment

[PeopleHR Terms and Conditions](#)

Wyvern GPS

[The Human Rights Act 1998 \(article 8\)](#)

[Article 6 Lawful process](#)