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Data Protection Policy

Purpose

The purpose of this Data Protection Policy is to ensure that personal data is handled lawfully, fairly, and securely in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The organisation is committed to protecting the privacy and rights of individuals whose personal data it processes.

Scope

This policy applies to all employees, contractors, consultants, agency workers, and third parties who handle personal data on behalf of the organisation. It covers all personal data processed in any format, including electronic, paper-based, and verbal communications.

Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Special Category Data:** Personal data revealing racial or ethnic origin, health information, sexual orientation, religious beliefs, or other sensitive information.
- **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, or deletion.

Data Protection Principles

The organisation processes personal data in accordance with the following principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

Lawful Basis for Processing

Personal data will only be processed where there is a lawful basis, including:

- Consent
- Performance of a contract
- Legal obligation
- Legitimate interests

The appropriate lawful basis will be identified and documented before processing begins.

Data Subject Rights

Individuals have the right to:

- Access their personal data
- Request rectification of inaccurate data
- Request erasure of data (where applicable)
- Restrict or object to processing
- Data portability

Requests must be submitted in writing and will be handled within statutory timeframes.

Data Security

The organisation implements appropriate technical and organisational measures to protect personal data, including:

- Secure storage of electronic and paper records
- Access controls and password protection
- Encryption where appropriate
- Secure disposal of data

All staff are responsible for maintaining data confidentiality and reporting any data protection concerns immediately.

Data Sharing and Transfers

Personal data will only be shared with third parties where necessary and in line with contractual and legal requirements. Data will not be transferred outside the UK unless appropriate safeguards are in place.

Data Retention

Personal data will be retained only for as long as necessary for the purposes for which it was collected and in accordance with the organisation's retention schedule. Data will be securely destroyed when no longer required.

Data Breaches

Any suspected or actual data breach must be reported immediately to senior management. The organisation will assess the breach and, where required, report it to the Information Commissioner's Office (ICO) within statutory time limits.

Training and Awareness

All staff will receive appropriate training on data protection responsibilities to ensure compliance with this policy and relevant legislation.

Responsibility

Senior management has overall responsibility for data protection compliance. All employees and workers are responsible for adhering to this policy and protecting personal data.

Review of Policy

This policy will be reviewed regularly to ensure ongoing compliance with legal requirements and best practice.