

Consalia Limited

Data Protection Policy

Revision History

V1.0		Louise Sutton	Issued
v1.1		Louise Sutton	Review and minor amendments
v1.2	31/1/2019	Yvonne Green	Review and minor amendments
v1.3	20/2/2021	Louise Sutton	Updated with new Consalia branding

Contents:

1. INTRODUCTION	3
2. OBJECTIVES	3
3. FAIR COLLECTION AND PROCESSING	4
4. SECURITY	4
5. SHARING AND DISCLOSURE OF PERSONAL INFORMATION	4
6. ACCESS	5
7. CONSALIA DATA PROTECTION RESPONSIBILITIES	5

1. Introduction

Consalia needs to gather and use certain information about individuals and clients. We recognize the need to adhere to the eight "Data Protection Principles," outlined in the Data Protection Act 1988, as listed below, which specify that personal data must be:-

1. Processed fairly and lawfully
2. Obtained for specific and lawful purposes
3. Adequate, relevant and not excessive
4. Accurate and up to date
5. Not kept any longer than necessary
6. Processed in accordance with the "data subjects" individual rights
7. Securely kept
8. Not transferred to any other country without adequate protection in situ.

This policy describes how data is collected, handled and stored to ensure that Consalia meets data protection standards – and to comply with the law.

Links with the Freedom of Information Act 2000

The Freedom of Information Act 2000 enables greater public access to information processed by companies such as Consalia. However, personal data continues to be protected by the Data Protection Act (DPA) 1998, and is therefore exempt from disclosure under the Freedom of Information Act (Section 40).

2. Objectives

Consalia's policy seeks to ensure that we have proper procedures in place for the processing and management of personal data relating to employees, students, alumni, clients and other companies and individuals we regularly contact.

We need to ensure that:

1. all staff understand their responsibilities when processing personal data and that methods of handling that information are clearly understood.
2. 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.
3. Other organisations with whom personal data needs to be shared or transferred need to meet compliance requirements.
4. Individuals and staff wishing to submit a data access request are fully aware of how to do this and who to contact.
5. We ensure that there is someone within the organisation who has specific responsibilities for data protection compliance. (The Data Protection Officer).
6. When new systems are being implemented we fully assess them 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's requirements.
7. We have a supportive environment for staff which promotes a culture of best practice processing of personal data.

Our policy applies to all personal data and sensitive personal data collected and processed by Consalia in the conduct of its business, in electronic format in any medium and within structured paper filing systems.

This policy applies to all Consalia employees, whether permanent, temporary, contractors, or consultants. Disciplinary action may be taken against staff failing to comply with this policy.

Consalia is registered with the Information Commissioner's Office (ICO) for collecting and using personal data. The registration reference is ZA218886.

(Main contact is Dr Philip Squire).

3. Fair Collection and Processing

The specific conditions contained in Schedules 2 and 3 of the DPA regard compliance with the fair collection and use of personal data will be fully complied with.

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. Personal data will be processed in accordance with the rights of the individuals about whom the personal data are held.

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.

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.

For marketing purposes, individuals whose personal information is held on a Consalia database will be provided with the option to 'opt out' of receiving future communications.

4. Security

Consalia will ensure that appropriate technical, organisational and administrative security measures to safeguard personal data are in place.

Staff will report any actual, near miss, or suspected data breaches to the Data Protection Officer for investigation. 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 corporate email by staff, including sending of sensitive or personal data to unauthorised persons, or use that brings Consalia into disrepute will be regarded as a breach of this policy.

Relevant 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. Data protection training will also promote awareness of the Consalia Data protection and information security policies, procedures and processes.

5. Sharing and disclosure of personal information

Consalia may routinely make certain personal information publicly available (having previously sought permissions). Examples could include Testimonials on its website. Consalia will undertake to cease

such activity for any data subject on the grounds of such disclosure causing damage and distress on application to Consalia.

Where applicable Consalia will inform individuals of the identity of third parties to whom we may share, disclose or be required to pass on information to, whilst accounting for any exemptions which may apply under the Data Protection Act 1998 and other relevant legislation.

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.

6. Access

Members of staff will have access to personal data only where it is required as part of their functional remit.

Individuals have the right to access the personal data that is held about them in our records and they may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If students would like to do this, they should contact academy@consalia.com. All other individuals should contact psquire@consalia.com. By law we are entitled to charge a fee of £10 to meet our costs in providing individuals with details of the information that we hold about them.

A data subject's personal information will not be disclosed to them until their identity has been verified. All data subjects have a right of access to their own personal data

7. Consalia Data Protection responsibilities

Data Controller : Consalia

Ultimate responsibility for Data Compliance : Dr P Squire, CEO Consalia

Line Manager duties

- Support and encourage staff to comply with Policy
- Ensure that line reports do not have access to personal data if it is not required as part of their functional remit

All staff

- Be familiar with and comply with the policy
- Ensure that information provided in connection with employment is up-to-date and accurate
- Observe and comply with the 8 data protection principles
- Do not attempt to gain access to information that is not necessary to hold, know or process
- Know and understand how to deal with subject access requests
- Note that unauthorised disclosure will be a disciplinary matter, and may be considered gross misconduct in some cases. It may also result in a personal liability for the individual and staff member.

Students

- Ensure that personal information provided is up-to-date
- Observe and comply with the 8 data protection principles
- Note that unauthorised disclosure of personal data will usually be a disciplinary matter

All data processors shall agree to conform to this policy and the Act, and as far as possible, indemnify Consalia against any prosecution, claim, proceeding, action or payments of compensation or damages without limitation and provide any personal information specified on request to the Data Protection Officer.