

## Data Protection Policy

IMS HRD 012

Version: 1.00



**Disclaimer**

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If you require further clarification on our document control system, please contact the Quality Assurance Department.





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## Data Protection Policy

### 2. Introduction

For the purposes of this policy Kibble Education and Care Centre and all associated companies will be referred to as Kibble.

- € This policy establishes and formalises the approach for ensuring personal information is properly processed, managed and protected in accordance with the requirements of the Data Protection Act 1998. This includes all personal data held, maintained and used in all locations and in all formats (paper and electronic including emails).
- € Kibble is committed to the principles detailed in the Data Protection Act and additionally recognises







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### 6. Definitions

The definitions below cover terms used within the policy.

In Scotland the Procurator Fiscal has the power to bring criminal proceedings for an offence

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### 7 Policy Introduction

To ensure Kibble offers and delivers relevant and appropriate services to our clients, Kibble will gather and process personal data about our clients/employees/volunteers and other individuals associated with Kibble.

Kibble is listed as a data controller with the ICO and subsequently has listed all types of personal data processed by Kibble and the purposes we use this data for. In addition it states any third parties with whom the information may be shared.

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### 7.7 (Principle 7) Information Security

Kibble has in place appropriate security measures to prevent the personal data it holds being accidentally or deliberately compromised. Personal data must be kept secure at all times. Kibble's Record Management Plan, Retention and Disposal Schedule, ICT Policies on Workstation Security and Email and Internet usage will provide support and practical advice that must be followed to protect all personal data in possession of Kibble.

#### 7.7.1 Data Breaches

Data breaches can occur through the theft or accidental loss of personal data (for example, laptops, tablets,

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### 8. Policy Information

#### 8.1 Disclosure of Personal Information

There are many instances where personal data can be disclosed with (and without) the consent of the individual or with their consent through a mandate. On any such occasions, only the personal data that is necessary should be disclosed. When considering the disclosure of information attention must be given to the purpose of the request for information which may include ensuring the safety and wellbeing of clients. All requests for disclosure which fall out with ~~without~~ **where**



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### 8.5 Unauthorised Disclosure

Employees (and all others covered by this policy) must never disclose personal data obtained in the course of their work with Kibble, or access personal data without appropriate permissions. It is a criminal offence under section 55



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### 8.9 Information Asset Register (To be decided if relevant or not)

An Information Asset Register will be maintained by the Data Protection Officer. The register identifies personal data and sensitive personal data held by Kibble, and helps to evaluate and assure compliance with Kibble's policies and processes.

### 8.10 Training

All employees, contractors, consultants and volunteers need to be aware of their obligations under the Data Protection Act 1998. A variety of training methods will be employed to ensure appropriate levels of awareness, understanding and knowledge.

## 9 Related Documents

Data Protection Act 1998  
Freedom of Information Act 2000  
Freedom of Information (Scotland) Act 2002  
Equalities Act 2010  
Kibble Record Management Plan  
Kibble Retention and Disposal Schedule  
Kibble Workstation Security Policy  
Kibble Email and Internet Usage Policy  
ICO Code of Practice on Privacy Notices  
ICO Code of Practice on Data Sharing

## 10 Equalities Impact

There is no adverse impact on any group in terms of race, religion, disability, ethnic origin, sexuality or age in relation to this policy. The Act includes clauses relating to information about young children and secondary legislation provides legislative grounds to be followed when dealing with personal information about people who have a limited capacity as to the understanding of their rights under the Act. Secondary legislation also provides clauses to ensure compliance with specific categories of information such as adoption and education records.



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