

Policy No: 003.Data Protection and Confidentialty Policy

Date Ratified	11/01/2021
Signed by	Daisy Jackson-Bogg / Chloe Whittall
Review Date	New policy to reflect change in delivery modes, transition from DBC to DCCi and Introduction of UK GDPR.
Next Review	March 2021/Date of full transition to DCC-i

Purpose of Policy

Daisy Bogg Consultancy Ltd - (Company No: 7300621) (DBC) is currently transitioning to a new company DCC Interactive Limited (Company No: 13075266), known as DCC-i, which will acquire DBC in its entirety. Therefore from the 1st January 2021 all Data provided to either company will be available to the other.

The purpose of this combined Data Protection and Confidentiality Policy is to ensure that all services provided DBC or DCC-i regarding the storing, processing and sharing of data is clear and adheres to both legislation and best practice guidelines. This policy is an integral part of ensuring that DBC/DCC-i provides a safe environment where individuals are treated with respect.

From this point forward all references to information provided, processed or shared should be read as applying to information supplied, stored, processed or shared by either DBC or DCC-i.

The main reasons for producing a policy are:

- to comply with legislation;
- to provide practical guidelines;
- to protect people providing and using DBC/DCCi services;



Legal Context of Policy

- The Human Rights Act 1998 guarantees respect for a person's private and family life, home and correspondence.
- The Data Protection Act 2018 (DPA) concerns personal information, which includes facts and opinions about an individual which might identify them.
- Other UK legislation may at specific times over-ride the Human Rights Act and the UK General Data Protection Regulations, Eg suspected terrorist activity or in relation to specific safeguarding concerns – DBC will always ensure that the appropriate legislative framework is followed for the specific situation.
- The Privacy and Electronic Communications Regulations 2003 – updated 2016 (PECR) provide the legislative framework in relation to all electronic Direct Marketing.
- The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 which enshrines the European General Data Protection Regulations 2018 (GDPR) following the UK exit from the EU on 31/12/2020 –The principles and requirements of these regulations (UK GDPR) provides the basis for this policy.
- At the current time DBC does not have any Overseas Customers other than the Isle of Man. The Isle of Man is covered for the purposes of Information Sharing by an 'Adequacy Agreement' between the UK and IOM that confirms that any organisation complying with its respective legislation is operating at a standard high enough to protect the sharing of data between the UK and IOM. This policy will be reviewed if DBC expands its customer base to include any customers outside the UK and IOM.
- Daisy Bogg Consultancy Ltd is currently transitioning to a new company DCC Interactive Limited, known as DCC-i, which will acquire DBC in its entirety. During the legal transition process which commences on the 1st January 2021 all Data provided to either company will be available to the other – this will be made clear to all customers in the Privacy Notice. The Directors of DCC-i will be legally responsible for this process and for ensuring all the activities of DBC/DCCi are compliant with this policy. All DBC staff and associates are individually responsible for complying with the law.





Statement on Confidentiality

Information shared in Confidence

DBC/DCC-i offers confidentiality in respect to sensitive information shared with any member of DBC/DCC-i Staff. Confidential information will not be passed on except in circumstances where this is explicitly agreed as part of a contract, it is necessary to protect a vulnerable person from harm, comply with professional registration requirements (Eg Social Work England) or to comply with the law (EG: As required by the Counter Terrorism & Security Act 2015 or The Counter-Terrorism and Border Security Act 2019)

In such circumstances, the information will only be passed on with the permission of a Director of DBC or DCC-i or a senior member of staff with delegated authority. Wherever possible and appropriate, any person whose information has been shared, will be informed that this action has been taken.

Personal Data

Personal Data is information entrusted by an individual in confidence, where there is a general obligation not to disclose or use that information without a clear legal basis. Confidential information may include any attributable information such as name, age, address, contact details or electronic identifiers; as well as sensitive personal information such as protected characteristics under the Equalities Act 2010, health or criminal records. This include information known or stored in any format, including photographs, videos and all electronic communications. For the purposes of this policy the GDPR 2018 definitions of Personal Data, Special Category Data and Criminal Offence Data and adopted by the UK GDPR Regulations 2019 are adhered to by DBC/DCC-i.

Information that identifies individuals personally is assumed to be confidential and will only be used when necessary and for the intended purpose for which it has been shared. The information will be stored and processed in line with legislation and best practice guidance as set out in this policy.

All individuals and companies providing DBC/DCC-i with personal data will be given clear information on how their information will be used, processed and stored, and if, how and when information will be archived or deleted.





Where consent is the legal basis for use of data, information will also be provided regarding how to withdraw consent and rights to erasure. This information will be provided by means of a clear privacy notice as set out in this policy.

Whenever possible, anonymised data—from which personal details have been removed and which therefore cannot identify the individual, will be used; this will also only be used for justified purposes.

Compliance with Data Protection Regulations.

ICO Code of Practice:

The Information Commissioners Office issued a new Code of Practice in December 2020 which is a statutory code of practice made under section 121 of the Data Protection Act 2018. DBC/DCC-i will comply with the Code as set out on the ICO Website ([Summary | ICO](#)).

In compliance with the Code of Practice we will:

- Be responsible for our compliance, and be able to demonstrate it
- Share personal data fairly and transparently.
- Identify at least one lawful basis for sharing data before sharing starts.
- Process personal data securely, with appropriate measures in place.
- Have policies and procedures that allow data subjects to exercise their rights.
- Share data in an emergency, if it is necessary and proportionate.
- Only share children's data if there is a compelling reason, taking account of the best interests of the child.
- Follow the framework for the sharing of personal data, for defined purposes across the public sector, under the Digital Economy Act 2017 (DEA).





UK GDPR

For the purposes of this policy, the GDPR 2018 Principles adopted by the UK GDPR Regulations 2019 ([The principles | ICO](#)) are adhered to by DBC/DCC-I in respect to the collection, storage, processing and sharing of all data.

Principles

All information will be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by UK GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Legal Basis

Prior to obtaining any Personal Data, DBC/DCC-i will ensure that we are clear under which legal basis the information is being obtained and processed, this will be made clear to the individual and/or company providing the data.





The six available bases are:

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public Task
- Legitimate Interests

Rights:

DBC/DCC-i will ensure that all individuals and companies providing data to DBC are aware of their rights as set out in the UK GDPR.

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (where applicable)
- The right to restrict processing
- The right to data portability (for automated data)
- The right to object
- Rights in relation to automated decision making and profiling (If carried out)

Means for Achieving Compliance with UK GDPR

DBC/DCC-i achieves compliance with GDPR by:

1. Ensuring this policy remains compliant and is reviewed annually, or more frequently if changes to data protection legislation occur. The current review period for this policy is 3 months in order to ensure the policy is reviewed for effectiveness and compliance with the new regulations and to account for changes to the DBC/DCC-i organisational structure. All staff are required to undertake initial training in respect of this policy and confirm their understanding – staff will undertake an annual refresher.
2. Ensuring DBC/DCC-i maintains up-to-date registration with the Information Commissioners Office and that this information is readily available to all DBC/DCC-i Customers. The current reference number for DBC ICO Registration is: ZA136846. DBC was first registered on 26 August 2015, and the current registration is valid until 25 August 2021. DCC-i ICO Registration is ZA839281, DCC-i was first Registered on the 3rd January 2021 and is Valid until 2nd January 2022.





3. Ensuring DBC/DCC-i has a Data Protection Officer (DPO) to deal with all queries in relation to Data Protection. The current DPO is Chloe Whittall – Professional Development Officer for DBC / Director for DCC-i.
4. Any Data Breach identified by any member of staff will be immediately reported to the Data Protection Officer (DPO) who is available by mobile and email out of hours in emergency situations. When the DPO is on leave or unavailable, another senior member of staff will assume this role.

All possible remedial action to secure the data or reduce the impact of its loss will be undertaken at the earliest possible time. Information breaches will be reported to the ICO in line with ICO Procedures within 72 hours, and a full investigation will be launched.

Any parties whose data has been affected will be appropriately informed of the data breach and all actions to reduce the impact of the data loss will be taken. All parties will be informed of their right to complain and inform the ICO or other relevant authority.

An investigation of learning points will be undertaken, and actions implemented following the completion to ensure the likelihood of any further data breaches is reduced.

5. Ensuring that all information stored electronically is protected by the use of a secure cloud-base system, encryption where appropriate, and a robust IT Policy for all staff to follow to maintain system security.

DBC/DCC-i does not routinely store sensitive data in hard copy. On the rare occasions this is necessary, physical data is kept in a locked storage container within an office on private property, that is locked when not staffed.

On the rare occasions that information is in transit, it is the responsibility of the DBC/DCC-i staff member or associate transporting it, information will be kept secure and minimal personal data will be transported to reduce the likelihood of data loss. Staff will be provided with a lockable box for any required storage and/or transportation.

6. Providing a Privacy Notice to all DBC/DCC-i Customers that covers all the routine DBC/DCC-i Business Areas (See Relevant Section of this Policy) and the key principles.





7. Undertaking a quarterly review of the DBC/DCC-i UK GDPR compliance.
8. Undertaking routine deletion of information that is no longer required (See Relevant Section of this Policy).
9. Undertaking Data Protection Impact Assessments (DPIA's) on all time-bound DBC/DCC-i Projects as part of the Project Initiation Documentation for each Project and ensuring Data processing is discussed and agreed with the commissioning organisation as part of the contract.

DBC/DCC-i will require commissioning Organisations to be GDPR compliant when providing contact details for DBC/DCC-i to undertake research and evaluation functions, which is shared in order for DBC/DCC-i to deliver against a contract.
10. Undertaking and recording legitimate interests' assessments (LIA's) for all business areas where 'Legitimate Interests' is the legal basis for using, retaining and processing data. This will be recorded in the DBC/DCC-i GDPR Information Audit Spreadsheet, which will be reviewed quarterly.
11. Ensuring all DBC/DCC-i staff are able to clearly identify any data collected which meets the GDPR Special Category Data / Criminal Offence Data. Staff identifying the collection of Special Category Data / Criminal Offence Data will report this to the Data Protection Officer who will undertake a DPIA or LIA and ensure the appropriate consents and safeguards are in place for the data collection.
12. DBC/DCC-i operates a clear system for responding to '**right to access**' requests within 1 month, unless grounds for extension or refusal applies – All DBC/DCC-i staff are able to recognise a request for access made verbally, by electronic means or in writing. The staff member receiving the request will record the request within 24 hours and report it to the Data Protection Officer within 3 working days.

The request will be reviewed and evaluated within 10 working days. The request will be responded to within 1 month, if retrieving the data requires additional time due to the volume or complexity of the data, the applicant will be informed of the need for an extension, which will not exceed 2 months.





The information will be provided in a clear and accessible format. If the applicants right to access is being refused, the Data Protection Officer will inform the applicant of the reason for this and ensure they are aware of their right to complain to the ICO, other relevant supervisory body or to seek judicial remedy.

13. DBC/DCC-i operates a clear system for responding to requests to **rectify information** within 1 month, unless grounds for extension or refusal applies - All DBC/DCC-i staff are able to recognise a request for rectification made verbally, by electronic means or in writing. The staff member receiving the request will record the request within 24 hours and report it to the Data Protection Officer within 3 working days. No further processing of the information will take place whilst the request is evaluated.

The request will be reviewed and evaluated within 10 working days. If it is assessed that the information is incorrect and does need to be rectified, remedial action will be undertaken within 1 month and the applicant informed of the action taken. If rectifying the information is a lengthy or complex process, the applicant will be informed of the need for an extension, which will not exceed 2 months.

The information will be provided in a clear and accessible format. If the applicants request to rectification is being refused, the Data Protection Officer will inform the applicant of the reason for this, and ensure they are aware of their right to complain to the ICO, other relevant supervisory body or to seek judicial remedy.

14. DBC/DCC-i operates a clear system for responding to requests to **restrict or object to the processing of information** within 1 month, unless grounds for extension or refusal applies - All DBC/DCC-i staff are able to recognise a request for restriction or objection made verbally, by electronic means or in writing. The staff member receiving the request will record the request within 24 hours and report it to the Data Protection Officer within 3 working days. No further processing of the information will take place whilst the request is evaluated.

The request will be reviewed and evaluated within 10 working days. If it is assessed that the information should be restricted, or the objection is valid, remedial action will be undertaken within 1 month and the applicant informed of the action taken.

If the remedial action is a lengthy or complex process, the applicant will be informed of the need for an extension which will not exceed 2 months.

The information will be provided in a clear and accessible format.





If the applicants request to restrict or object to the processing of data is refused, the Data Protection Officer will inform the applicant of the reason for this and ensure they are aware of their right to complain to the ICO, other relevant supervisory body or to seek judicial remedy. The information will be archived or deleted in line with DBC/DCC-i Retention and Deletion Procedures (See Relevant Section of this Policy)

If the objection relates to an individual or company information being utilised for Marketing Process, this right will be respected unequivocally, and the information will no longer be used for Marketing.

15. DBC/DCC-i operates a clear system for responding to requests to **erase information** within 1 month, unless grounds for extension or refusal applies - All DBC/DCC-i staff are able to recognise a request for data erasure made verbally, by electronic means or in writing. The staff receiving the request will record the request within 24 hours and report it to the Data Protection Officer within 3 working days. No further processing of the information will take place whilst the request is evaluated.

The request will be reviewed and evaluated within 10 working days. If it is assessed that the request for erasure is valid, this action will be taken in line with the DBC/DCC-i erasure and retention policy. The request will be responded to within one month and the applicant will be informed within what timeframe the data can be erased, if necessary the information will be archived and scheduled for deletion at the earliest appropriate opportunity. (See Relevant Section of this Policy).

The information will be provided in a clear and accessible format. If the applicants request to restrict or object to erase data is refused, the Data Protection Officer will inform the applicant of the reason for this and ensure they are aware of their right to complain to the ICO, other relevant supervisory body or to seek judicial remedy.

If the erasure request relates to the individual or company information being erased from Marketing lists, this right will be respected unequivocally, a record of the request will be maintained for suppression purposes; ie: to ensure further marketing requests are not sent. The information will be deleted in line with DBC/DCC-i Deletion Procedures.

16. DBC/DCC-i Customers will all be informed of their right to withdraw consent/object to Direct Marketing in each communication, any requests to opt-out of Marketing will be acted on promptly.





17. At the current time DBC/DCC-i does not use automated processing methods, therefore there are not specific procedures for portability, automated decision-making and profiling contained within this policy, should this change the UK GDPR guidance will be adhered to and the policy refreshed.

Privacy Notices

DBC/DCC-i will provide a Privacy Notice for all main areas of the business, the Privacy Notice will contain the underpinning principles for all data processing. The Privacy Notice will be publicly available on the DBC/DCC-i Website.

The Privacy Notice will be included in the DBC/DCC-i Terms and Conditions for new customers. The Privacy Notice will include specific named business functions where there is a data processing function, in particular how data provided for delivering training is used. Salient points on the Privacy Notice will included in DBC/DCC-i email communications, particularly in relation to Marketing, which will notify customers of their right to object.

What we provide:

- The name and contact details of our organisation.
- The contact details of our data protection officer.
- The purposes of the processing.
- The lawful basis for the processing.
- The legitimate interests for the processing (if applicable).
- The categories of personal data obtained (if the data is obtained from 3rd party).
- The recipients or categories of recipients of the personal data.
- The retention periods for the personal data.
- The rights available to individuals in respect of the processing.
- The right to withdraw consent (if applicable).
- The right to lodge a complaint with a supervisory authority.
- The source of the personal data (if the data is obtained from 3rd party).
- The details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).





When we provide it

- We provide individuals with privacy information at the time we collect their personal data from them.
- If we obtain personal data from a source other than the individual it relates to, we provide them with privacy information:
 - within a reasonable of period of obtaining the personal data and no later than one month;
 - if we plan to communicate with the individual, at the latest, when the first communication takes place;
 - or if we plan to disclose the data to someone else, at the latest, when the data is disclosed.

How we provide it

We provide the information in a way that is:

- Concise.
- Transparent.
- Intelligible.
- Easily accessible.

Retention, Archiving and Deletion Policy

DBC/DCC-i understands the requirement not to retain personal information longer than is necessary and operates procedures to comply with this, whilst still ensuring that data is available for legitimate interests, legal requirements and contractual purposes. Below is a list of common areas of DBC/DCC-i business and the associated retention and deletion policy, however this list is not exhaustive and all requests for deletion will be considered.

Emails – DBC/DCC-i operates a standard retention of email for up to 7 years. This enables DBC/DCC-i to be able to respond to all data requests, contract disputes, evidence services delivered and legal matters. If contracts have ended the emails will be archived. Contact information will not be used for any other purposes than those they were originally initiated for.





To comply with this requirement all staff will be required to delete emails over 6 years old on the closest working day to the 1st January each year; thereby ensuring no email will be kept over 7 years. Exceptions will be discussed and agreed with the DPO.

Emails containing registers and/or details of individuals who have additional learning needs to allow for reasonable adjustments, are considered to contain sensitive personal information, and will be deleted after 6 months unless relevant to a complaint or legal process. To comply with this requirement all emails containing registers or information regarding delegates additional needs will be marked on receipt and the DBC/DCC-i administrator will perform a rolling monthly deletion of emails that are over 6 months old.

Any other requests for immediate email deletion will be considered by the Data Protection Officer on a case-by-case basis and will be carried out, unless there is a legitimate, exceptional or legal reason not to.

Delegate Information for Training Courses – Delegate lists are all electronic – there are no printed registers. This information will be kept for 12 months to allow DBC/DCCi to respond to attendance queries that occur; this is considered a sufficient time-frame and the data will be considered obsolete after this point. To comply with this requirement all registers will be saved in monthly folders on sharepoint and the DBC/DCC-i administrator will perform a rolling monthly deletion of registers, applications and any course records (excluding certificate which are kept indefinitely) that are over 12 months old. Registers will be deleted from MS Teams Weekly by the DBC/DCC-I Tech Support.

Delegate information utilised for MS Teams Guest Accounts – Customers provide delegate email addresses which are used for the creation of Guest Accounts in the DBC/DCC-i Teams Account in an area allocated specifically to that customer organisation. On the rare occasions that personal email addresses are provided they will be deleted the within 7 days of the training being completed. Where the email address provided is an organisational email the account will remain indefinitely whilst the organisation is still utilising DBC/DCC-i services, unless the individual makes contact requesting deletion. If a customer formally ends its contract with DBC/DCC-i the customer area within the team will be deleted within 14 days of the notification. On the 1st of April each year the DBC/DCC-i Tech Support Officer will delete all Customer Areas that have not booked any training in the previous 6 months and have no training booked in the next 6 months.





Evaluation Forms – Current Evaluations may contain email addresses. These will be kept for a maximum of 12 months. From 11/01/2021 this will be removed therefore evaluations will no longer contain personal or sensitive data.

Contact Lists for Marketing Purposes – Contact lists are internal and generated following specific requests for the provision of services. Utilising the legal basis of 'legitimate interests', individuals will be contacted in respect of similar services only. All communications will inform the customer that they can object to their data being processed for this purpose at any point, and a simple mechanism will be in place to enable customers to have their data erased from marketing purposes. This request will be recorded to ensure further marketing is not sent and to record the actions taken.

OCN and Internal Certifications – These records will be maintained indefinitely unless deletion is requested, as it is common for individuals to lose their certificates and ask for them to be re-issued many years after completion, this can only be done if a record of the original certificate exists. This is deemed to be in the interests of the individual. The information is archived and not used for any other purposes other than to respond to requests for replacement certification.

Research and Evaluation Projects – Information received for research and evaluation policies is anonymised for the purposes of the final report, unless express permission has been obtained to name participants. Original data will be archived indefinitely and not accessed for any other purpose other than to clarify information relating to the original research or evaluation programme, or for further research or evaluation with the same parameters. Any requests for deletion will be considered and carried out unless there is a legitimate, exceptional or legal reason not to.

DBC/DCC-i Staff and Associate Information – This information is retained whilst a member of staff or associate is in the employment of DBC/DCC-i, and for at least 7 years following a staff member or associate ceasing to work for DBC/DC-i in line with HMRC and legal requirements. DBS information is kept for all staff in active employment for DBC/DCC-i as it is regularly required by our customers and commissioners before staff or associates can provide services. This is kept with consent and is destroyed immediately when the member or staff or associate ceases working for DBC/DCC-i.





Independent Social Work Services – DBC/DCC-i offer independent Social Work Services such as independent assessments and expert reports; information obtained regarding these pieces of work come under the categories of Legal Obligation and/or Public Task and therefore this information is retained indefinitely.

DBC/DCCi provides independent supervision services, much information is given by 'Consent' therefore is eligible for consideration of erasure, however the data is ultimately recorded under the 'Legitimate Interest' UK GDPR definition (detailed above) as we may need to refuse any request for refusal if it is essential for DBC/DCC-i to be able to evidence services provided or actions taken.

DBC/DCCi also provide Practice Education/ASYE Assessment and PE Mentoring and Assessment Services. This service is agreed by contract, however the information will be held under the 'Public Task' UK GDPR definition, as this information relates to the achievement of a professional qualification/completion of an assessed period of employment it may be required in verifying or querying of the relevant award and therefore will be kept indefinitely and is not eligible for deletion. The information will be archived securely once the award and moderation is confirmed. This is in line with the expectations of Social Work England and the BASW Code of Ethics.

ARCHIVED INFORMATION

DBC previously held a contract with the Department of Health and Social Care for the Principal Social Worker Forum and ASYE Certification. This information was provided to the DHSC at the end of the contract as specified in that contract. This data has been archived on a secure cloud-based system. Under the category of Public Interest; ASYE certification information must be retained indefinitely.



Appendix 1 – Compliance Checklist

Action Required	Person Responsible	Date for completion or frequency of action
Make Policy available to all staff and associates – with date to reply confirmation of reading policy.	DPO	11/1/2021 with response required by 29/1/2021
Provide all staff and associates with DPA Policy Training.	DPO	31/3/2021 THEN Annual Refresher
All staff to delete emails over 6 years old or request retention exception to DPO.	All staff	29/1/2021 THEN Annually by closest working day to Jan 1st
Emails containing Registers or delegate information over 6 months old in all shared inboxes to be deleted, or request exception to DPO	Administrator	Backlog – 31/3/2021 THEN rolling monthly task.
Registers, records & applications (Excluding certificates which are kept indefinitely) over 12 months old to be deleted from Sharepoint, or request exception to DPO	Administrator	Starting 1/4/2021 THEN rolling monthly task
Registers to be deleted from MS Teams weekly	Tech Support	Backlog by 29/1/2021 Starting 11/1/2021 THEN rolling weekly task.

Deletion of MS Teams Areas at end of contract or if no bookings in the previous/next 6 months on 1 st April each year.	Tech Support	Within 14 days of formal notification of a contract end. Routine Deletions Starting 1/4/2021 THEN Annually on closest working day to 1 st April
Undertaking Data Protection Impact Assessments (DPIA's) to be completed on all Research or Evaluation Projects	Project Lead	Commencement of Project
Undertaking Legitimate Interests' Assessments (LIA's) for all key areas of the business.	DPO	29/1/2021 THEN Quarterly
Reporting, Recording and responding within timescales to all requests for right to access data, to rectify or erase data or restrict or object to processing of data that is classified as personal or sensitive.	Reporting & Recording – staff member receiving request, Response by DPO	At time of request in line with the timescales of this policy
Responding within timescales to remove individuals from marketing correspondence on request.	Administrator	At time of request in line with the timescales of this policy
Responding within timescales to any occurrences of Data breaches.	Reporting & Recording – staff member receiving request, Response by DPO	At time of breach in line with the timescales of this policy
Ensuring all delegates are informed in the joining instructions that their data has been provided to us by their employer and	Wording by DPO – inclusion in	Wording & link to privacy notice by 11/1/2021. THEN

informing them where the Privacy Notice is located in respect of this data.	invites by Tech Support	Included in all invites
Maintaining ICO Registration	DPO	Annually according to expiry date.
Maintaining compliance with ICO requirements and reviewing compliance with this Policy including updating Privacy Notice if required.	DPO	Quarterly.

