



## DATA PROTECTION POLICY

### 1. SCOPE

This policy applies to all staff employed by SEAFOOD CORNWALL TRAINING (SCT) and those subcontracted by SEAFOOD CORNWALL TRAINING (SCT).

### 2. CONTEXT

The Data Protection Act 1998 as amended 2003 requires the protection of personal data and all organisations which process personal data must be registered to do so. SEAFOOD CORNWALL TRAINING (SCT) is registered with the Data Protection Commissioner.

### 3. PURPOSE

This policy sets out an understanding of data protection and the requirements of every member of staff and sub contractor in order that there may be full compliance with the Data Protection Act 1998 as amended 2003.

### 4. DEFINITIONS

4.1 SCT currently keeps details for five purposes:

- Accounts, Records and Memberships
- Advertising, Marketing and Public Relations
- Staff Administration and Project Management
- Contact details of course candidates
- Reporting to awarding / certificating bodies

4.2 Data is information which is recorded with the intention that it should be processed on computer or is recorded as part of a relevant filing system (i.e. manual system). There are two categories of data: (see 4.2.1 & 4.2.2)

4.2.1 Personal data is information relating to a living individual who can be identified:

- from the data
  - from the data which includes an expression of opinion about the individual
- Example: name and address details

4.2.2 Sensitive personal data is information relating to:

- racial or ethnic origins of the data subject
- political opinions
- religious beliefs or other beliefs of a similar nature
- trade union membership
- physical or mental health
- sexual life
- the commission or alleged commission of any offence
- any proceedings for any offence committed or alleged to have been committed by the data subject.

In order to process these types of data consent from the data subject must be obtained by SCT handling the data. Explicit consent must be given when it is sensitive personal data.



## 5. POLICY

SCT has a data protection policy to ensure that it complies with all aspects of data protection legislation (1984, 1998 and 2003) by setting out clear policies, responsibilities and codes of practice:

5.1 SCT intends to comply fully with all aspects of data protection legislation.

5.2 SCT will make all reasonable efforts to maintain a comprehensive written notification with the Data Protection Commissioner.

5.3 SCT will do its utmost to ensure that all its staff and consultants are conversant with data protection legislation and practice.

5.4 SCT will only hold data for prescribed business purposes.

- These are Accounts, Records and Memberships
- Advertising, Marketing and Public Relations
- Staff Administration and Project Management
- Contact details of course candidates
- Reporting to awarding / certificating bodies

5.5 SCT will use a standard, 'Privacy Notice' in all SCT literature in which personal data is collected. The statement for use is:

**Personal details and records of any training undertaken will be stored on our computer. We would like to contact you after you have completed your training to find out how useful it has been and how it has helped you develop your career. Put an X in this box if you do not wish to be contacted:**

5.6 SCT will provide procedures for access to personal data for all those for whom personal data is held. No charge should be levied on anyone (staff, personal members or other contacts) requesting access to their personal data. This will be reviewed if there is a high level of requests for access

5.7 All staff may request sight of their personal details on computer provided reasonable notice (at least 14 days in writing) is given. NB: references may be exempt from all Data Protection legislation.

5.8 SCT's job application form has been amended to include the individual's consent to sensitive personal data being used by SCT's Department for recruitment, selection and statistical purposes. Likewise when CV's are received, the letter in acknowledgement will contain a clause: "The information contained in your letter and CV will only be used by SCT for recruitment, selection and statistical purposes."



## DATA PROTECTION CHECKLIST

### Existing Data

- Are you currently holding any personal data?
- Is it held securely?
- For what purpose are you holding it?
- Is it sensitive personal data?
- Does the individual know you are holding their personal data/ have they given their consent?
- Has SCT notified the Data Protection Commissioner that it holds this data and the purpose for which it is held? If not please tell a member of the data protection working group.
- Is the data accurate?
- Does the data still need to be held?

### Collection Of New Data

- Make sure you include SCT'S Privacy Notice on the form together with a relevant opt out for other communications.
- When collecting data from new contacts by phone, email, or letter, make sure that they know about our Data Protection Statement and Email statement
- When requesting a new page to be put on the website that will result in the collection of data ensure that the page contains a link to SCT's Data Protection Statement and Email statement as appropriate.
- Check with the Office Manager that SCT has notified the Data Protection Commissioner that this type of data is held.
- Delete the data when it is no longer required.
- Don't take personal data from another organisation without the consent of the individual concerned.

### Use of Data

Are you passing personal data to anyone else:

- Inside SCT
- Outside SCT
- Are you using blind copies when sending email distribution lists?
- Do not pass personal data to any person outside SCT without the permission of the individual to whom the data relates.

### Disposal of data

- Ensure all paperwork containing personal information is disposed of by an approved confidential shredding contractor. Eg. Cory

## 10. QUERIES

If you have questions about data protection, please refer them to responsible person.

Signed ..... Date .....

Responsible Person Clare Leverton