



Document Control

| | |
|------------------------------------|--|
| Policy Title | Data Protection Policy |
| Policy Number | 88 |
| Owner | Information & Communication Technology Manager |
| Contributors | Data Protection Officer |
| Version | 1.0 |
| Date of Production | 1 September 2014 |
| Review date | 1 September 2016 |
| Post holder responsible for review | Data Protection Officer |
| Primary Circulation List | Shared Drive |
| Web address | n/a |
| Restrictions | None |

Version Control

| Version Number | Owner | Description | Circulation |
|----------------|--|-------------|-------------|
| 1.0 | Information & Communication Technology Manager | Review | SMT |



1.0 POLICY STATEMENT:

Sunbeam House Services (SHS) needs to collect and use data (information) for a variety of purposes about its staff, service users and other individuals who come in contact with Sunbeam.

The purposes of processing data include the organisation and administration of service provision, the recruitment and payment of staff, compliance with statutory obligations, etc.

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data. The Data Protection Act 1988 and the Data Protection (Amendment) Act 2003 confer rights on individuals as well as responsibilities on those persons processing personal data.

Personal data, both automated and manual are data relating to a living individual who is or can be identified, either from the data or from the data in conjunction with other information.

2.0 SCOPE:

This policy is a statement of SHS's commitment to protect the rights and privacy of individuals in accordance with the Data Protection act 1988 and the Data Protection (Amendment) Act 2003.

3.0 PRINCIPLES OF THE ACT

SHS will administer its responsibilities under the legislation in accordance with the eight stated data protection principles outlined in the Act as follows:

3.1 Obtain and process information fairly

SHS will obtain and process personal data fairly and in accordance with the fulfilment of its functions.

| | |
|-------------------------------------|-----------------|
| Policy No.88 | Revision: 1.0 |
| Page 2 of 4 | Department: 007 |
| Full Policy ID Number : 007.088.1.0 | |



3.2 Keep it for one or more specified, explicit and lawful purposes

SHS will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes

3.3 Use and disclose it only in ways compatible with these purposes

SHS will only disclose personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data.

3.4 Keep it safe and secure

SHS will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. SHS is aware that high standards of security are essential for all personal information.

3.5 Keep it accurate complete and up-to-date

SHS will have procedures that are adequate to ensure high levels of data accuracy. SHS will examine the general requirement to keep personal data up-to-date. SHS will put in place appropriate procedures to assist staff in keeping data up-to-date.

3.6 Ensure that it is adequate, relevant and not excessive

Personal data held by SHS will be adequate, relevant and not excessive in relation to the purpose/s for which it is kept.

3.7 Retain it for no longer than is necessary for the purpose or purposes

SHS will have a policy on retention periods for personal data.

3.8 Give a copy of his/her personal data to that individual on request.

SHS will have procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation

4.0 RESPONSIBILITIES:

SHS has overall responsibility for ensuring compliance with the Data Protection legislation. However, all employees of SHS who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation.

SHS will provide through the Data Protection Officer, support, assistance, advice and training to all locations, offices and staff to ensure it is in a position to comply with the legislation.

| | |
|-------------------------------------|-----------------|
| Policy No.88 | Revision: 1.0 |
| Page 3 of 4 | Department: 007 |
| Full Policy ID Number : 007.088.1.0 | |

| | |
|---|---|
| Sunbeam House Services Policy Document | Title: Data Protection Policy |
| | Effective Date: 1 September 2014 |



5.0 GUIDELINES:

This policy supports the provision of a structure to assist in SHS's compliance with the Data Protection legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

Any queries with regards to Data Protection please contact SHS's Data Protection Officer.

| | |
|-------------------------------------|-----------------|
| Policy No.88 | Revision: 1.0 |
| Page 4 of 4 | Department: 007 |
| Full Policy ID Number : 007.088.1.0 | |