## 1. Introduction

Results Driven Group (RDG) is fully committed to compliance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). RDG will therefore follow procedures that aim to ensure that all employees, contractors, agents, consultants and partners who have access to any personal data held by or on behalf of the Company, are fully aware of and abide by their duties and responsibilities under the Act.

Our Data Protection Policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

## 2. Main Statement of Policy

In order to operate efficiently, RDG has to collect and use information about people with whom it works. These may include current, past and prospective employees, clients, suppliers and learners. In addition it may be required by law to collect and use information in order to comply with the requirements of central government.

This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the Act and GDPR to ensure this.

RDG regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between The Company and those with whom it carries out business. The Company will ensure that it treats personal information lawfully and correctly.

To this end RDG fully endorses and adheres to the principles of Data Protection as set out in the Data Protection Act 2018 and GDPR.

## 3. Data Protection Principles

The Act stipulates that anyone processing personal data must comply with **Eight Principles** of good practice. These Principles are legally enforceable.

The Principles require that personal information:

**1)** Shall be processed fairly and lawfully

**2)** Shall only be obtained for specific and lawful purposes

**3)** Shall be adequate, relevant and not excessive

**4)** Shall be accurate and, where necessary, kept up to date

**5)** Shall not be kept for longer than is necessary

**6)** Shall be processed in accordance with the rights of data subjects under the Act

**7)** Shall be kept secure

**8)** Shall not be transferred to a country without adequate protection

The Act provides conditions for the processing of any personal data. It also makes a distinction between **personal data and sensitive personal data**.

Personal data is defined as data relating to a living individual who can be identified from:

- that data;
- that data and other information which is in the possession of, or is likely to come into the possession of the data controller and includes an expression of opinion about the individual and any indication of the intentions of the data controller, that can be held electronically or in a hard copy in respect of the individual.

Sensitive personal data is defined as personal data consisting of information as to:

- Racial or ethnic origin
- Political opinion
- Religious or other beliefs
- Trade union membership
- Physical or mental health or condition
- Sexual life
- Criminal proceedings or convictions

## 4. Handling personal/sensitive information

Results Driven Group will, through appropriate management and the use of strict criteria and controls:-

- Observe fully conditions regarding the fair collection and use of personal information
- Meet its legal obligations to specify the purpose for which information is used
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Apply strict checks to determine the length of time information is held
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Ensure that the rights of people about whom the information is held can be fully exercised under the Act

  These include:

  - The right to be informed that processing is being undertaken
  - The right of access to one's personal information within the statutory one month
  - The right to prevent processing in certain circumstances
  - The right to correct, rectify, block or erase information regarded as wrong information

In addition, Results Driven Group will ensure that:

- There is someone with specific responsibility for data protection in the organisation.
- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice.
- Everyone managing and handling personal information is appropriately trained to do so.
- Everyone managing and handling personal information is appropriately supervised.
- Anyone wanting to make enquiries about handling personal information, whether a member of staff or a member of the public, knows what to do.
- Queries about handling personal information are promptly and courteously dealt with.
- Methods of handling personal information are regularly assessed and evaluated.
- Performance with handling personal information is regularly assessed and evaluated.
- Data sharing is carried out under a written agreement, setting out the scope and limits of the sharing. Any disclosure of personal data will be in compliance with approved procedures.

All staff are to be made fully aware of this policy and of their duties and responsibilities under the Act.

All managers, staff and representatives working within and on behalf of the Company will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure and in particular will ensure that:

- Paper files and other records or documents containing personal/sensitive data are kept in a secure environment.
- Personal data held on computers and computer systems is protected by the use of secure passwords.
- Individual passwords should be such that they are not easily compromised.

All contractors, consultants, partners or agents of the Company must:

- Ensure that they and all of their staff who have access to personal data held or processed for or on behalf of the Company, are aware of this policy and are fully trained in and are aware of their duties and responsibilities under the Act. Any breach of any provision of the Act will be deemed as being a breach of any contract between the Company and that individual or company.
- Allow data protection audits by the Company of data held on its behalf (if requested);
- Indemnify the Company against any prosecutions, claims, proceedings, actions or payments of compensation or damages, without limitation.

All contractors who are users of personal information supplied by the Company will be required to confirm that they will abide by the requirements of the Act with regard to information supplied by the Company.

## 5. Implementation

The Managing Director is responsible for ensuring that the Policy is implemented. Implementation will be led and monitored by the Office Manager who will also have overall responsibility for:

- The provision of cascade data protection training, for staff.
- For the development of best practice guidelines.
- For carrying out compliance checks to ensure adherence, throughout company, with the Data Protection Act.

This policy will be reviewed annually as a minimum.

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| **Signature (Chris Goodwin):** |  | **Position:** | **Managing Director** |
| **Date:** | **31 March 2021** | **Review Date:** | **31 March 2022** |