

GSS – General Data Protection Policy

GSS is committed to high standards of information security, privacy and transparency. We place a high priority on protecting and managing data in accordance with current Data protection standards and new EU General Data protection laws which come into force on 25th May 2018. GSS will comply with all applicable GDPR regulations when they take effect including as a data processor, while also working closely with our customers and partners (Data subjects) to meet contractual obligations for our procedures and services. Our team of experienced consultants, Management and support staff will work to ensure we process all data in accordance with GDPR procedures and are committed to ensure compliance at all times.

GSS acknowledge and agree that any personal data that we handle will be processed in accordance with all applicable data protection laws in force at the time.

Overall

The overarching principle of this policy is that;

- All data collected and/or stored by GSS is done so for the sole purposes of GSS's business and an individual's relationship with GSS and or its partner organisations. This will include, but is not limited to, internal marketing of events, notification of relevant information, educational/training, employability, quality standards, CPD and contractual compliance. Individual's personal data will not be shared with any third party without prior written consent.
- No member of staff will share any personal data with a third party without the prior consent of the individual. This includes, but is not limited to Name, address, email address and phone details.
- All GSS Staff will sign and attend training in relation to understanding the governing principles of GDPR and this will form part of all staff induction and training, current and future whether permanent, temporary or contract.

Data Protection Controller

GSS has appointed a Data controller in Richard Wood, Director who will endeavour to ensure that all personal data is processed in compliance with this policy and the principles of the Data Protection Act 1998, the Freedom of Information Act 2000 and the protections of Freedoms Act 2002 which are also relevant to this policy.

General Principles

GSS shall so far as is reasonably practical comply with the Data protection principles contained in the Data Protection act to ensure all data is

- Fairly and lawfully processed
- Adequate, relevant and not excessive
- Accurate and up to date

- Must not be kept for longer than necessary
- Processed in accordance with the data subjects rights
- Secure
- Not transferred to other countries without adequate protection

How we use information

GSS will collate information from customers (Data subjects) for the purpose of providing services to them usually within employability or training capacity. The information will have been provided by the customer them self or our partner organisations such as Central and local government agencies . The information is used to establish customer eligibility for our services, right to receive services under government funded programmes, authenticity and for GSS to comply with contractual and legal obligations.

GSS also keep information from prospective applications and staff details which all fall under the general principles of data protection as detailed above.

How we store information

All personal data is stored appropriately and all members of staff are responsible for ensuring that any personal data which we hold is kept securely and not disclosed to any unauthorised third parties.

GSS will ensure that all personal data is accessible only to those who have a valid reason for using it. GSS will have in place appropriate security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards with controlled access (with the keys then held securely with controlled access):

- Password protecting personal data held electronically.
- Archiving personal data which are then kept securely (lockable cabinet).
- Placing any PCs or terminals that show personal data so that they are not visible except to authorised staff.
- Ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, GSS will put in place appropriate measures for the deletion of personal data, manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible destroyed physically. GSS use a secure waste management organisation and keep records of this.

This policy also applies to GSS staff who process personal data 'off-site', e.g. when working from home or alternate premises ie, DWP premises, and in these circumstances additional care must be taken regarding the security of the data.

Your Rights

Data subjects have the right at any time to ask for a copy of the information that we hold about them. Individuals wishing to exercise this right should apply in writing to GSS's Management and any such requests will be complied with within 28 working days within the guidelines of disclosure and subject to verification of individual request.

In addition to the right of access to your information data subjects will also have the following rights

- Right to Erasure
- Right to Restriction of processing
- Right to rectification
- Right to restrict processing
- Right to data portability
- Right to withdraw consent

If there are any concerns about the way GSS are collating and using personal data concerns can be raised at any time in the first instance to GSS's Management team or Directors

- Sonia Benjamin-Leach
- Richard Wood

Or directly to Information Commissioners Office at <https://ico.org.uk/concerns>

Review

This policy will be reviewed and updated as necessary to reflect best practice, future amendments to the General Data protection Regulations (GDPR) May 2018 and the Data protection act.

Any breaches to the above could constitute gross misconduct and where found, individuals could be subject to disciplinary procedures accordingly.

This policy is not exhaustive and is in conjunction with GSS Information and Data Security policy, GSS confidentiality policy and GSS Diversity.



Signed by Sonia Benjamin-Leach
Director
27.06. 2018
Updated v1