

# **Engagement initiatives**

# **Data Protection Policy**

Last updated January 2018

## We support

#### 1 Purpose

The RCP is committed to managing and processing personal data, as covered by the General Data Protection Regulation 2016 (GDPR), securely and sensitively and only with the consent of employees. This policy sets out the approach the RCP will take.

#### 2 Scope

This policy applies to all employees.

#### **3** Policy statement

The RCP will process all personal data and comply with the requirements of the GDPR, and subsequent acts regarding the management and processing of personal data.

#### 4 **Responsibilities**

It is the responsibility of all employees to ensure that data is only collected and processed for legitimate business use and with the express consent of the individual as required.

#### 5 General principles

All aspects of gathering, using and disposing of personal data are covered by the GDPR. The RCP has a duty to comply with this legislation in all its activities. Employees have a duty to cooperate with the RCP to ensure it complies with the act.

Note: Personal data is information from which a living individual can be identified eg someone's details held on the membership database.

### 6 Processing data for acceptable use

Employees should:

- only collect the personal data needed for the activity or task
- ensure personal data is recorded accurately
- ensure no unauthorised persons can access personal data at any time
- store personal data securely
- dispose of personal data when no longer needed
- dispose of personal data securely
- contact the Data Protection Officer immediately if they receive a request for personal data (Subject Access Request)
- contact the Data Protection Officer immediately if they become aware of a loss of personal data due to theft, loss of equipment or other security issue (information breach).

### 7 Unacceptable use of data

Employees should not:

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- collect personal data without informing the subject of the purpose or use of the data
- use personal data for any purpose other than the purpose for which it was collected, without consent
- record anything about an individual which they would not be prepared to disclose to them, if required
- make personal data available where they are unsure of the recipient or they are not certain the data can only be accessed by the recipient
- release personal data to unauthorised persons
- respond to subject access requests without consulting the Data Protection Officer.

### 8 Freedom of information

As the RCP is not a public body, we are not required to comply with the Freedom of Information Act. Any requests for information under freedom of information should be forwarded to the Data Protection Officer.

### 9 Data protection officer

For further advice on data protection compliance, please contact the Data Protection Officer.

Pamela Forde Data Protection Officer

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