

# **SELKIRK BIDS**

## **DATA PROTECTION TRAINING POLICY – 30.01.23**

### **Introduction**

Selkirk BIDS recognised that everyone has rights in regards of the way in which their personal data is handled.

During the course of Selkirk BIDS activities we will collect, store and process personal Data.

We recognise that the correct and lawful treatment of this personal data will maintain confidence in the organisation and will provide for successful operations.

### **1. Responsibility**

The responsibility for the production and maintenance of this document is with the Data Protection Officer as detailed within the Privacy policy. They will also ensure that any substantive changes made will be communicated to all relevant personnel.

### **2 Volunteer /Staff Data Protection Training Policy**

Selkirk BIDS Data Protection Training Policy is the responsibility of the Data Protection Officer to ensure that the policy set is and remains internally consistent.

It is the responsibility of the Data Protection Officer ensure that Data Protection training is provided to all new volunteers/employees as part of their induction program and volunteers/employees are provided with regular refresher training to include any updates or changes.

### **3 Scope**

This policy applies to all volunteers, permanent, temporary or contracted employees of Selkirk BIDS who are able to access information.

### **4 Purpose and Objectives**

The purpose and objectives of this policy are in addition to those fully detailed within Selkirk BIDS Privacy Policy and CCTV Codes of Practice.

The purpose of this policy is to set out the training that staff will be provided with to ensure that all handling of personal data is compliant with UK data protection legislation (including GDPR).

### **5. Frequency of Training**

Training required by this policy should be provided to all new volunteers/employees as part of their induction program.

All existing volunteers/employees shall also be provided with the training required by this policy unless this has been provided to them already.

All volunteers/employees shall receive a refresher of relevant training at least every twelve months or following a material change in data protection law or regulation.

Selkirk BIDS will keep a record of what training has been undertaken by each data user.

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### 6. Training for Data Users

All volunteers/employees will receive training on their responsibilities under Selkirk BIDS Privacy and CCTV Codes of Practice and all of its listed sub-policies and supporting procedures. All nominated staff will be Disclosure Checked in accordance with current Legislation.

This will include guidance on:

#### **Data Protection Principles:**

- what data processing is;
- how personal data must be handled in accordance with the data protection principles;
- awareness that failure to comply with the information governance requirements contained in NDCC policies may result in disciplinary action; and
- the possibility that they may commit criminal offences if they deliberately try to access, or to disclose, personal data without authority.

#### **Day to day office security:**

- personal desk and work area management;
- implementation of the company's Clear Desk, Clear Screen Policy;
- the disposal of confidential waste;
- password management and the company's Password Policy;
- how to access and exit the premises;
- visitor security and management; and
- the use of portable media and cloud-based storage facilities.

#### **Data Breach and Incident Reporting:**

- how to identify a possible data breach;
- how suspected and actual security breaches affecting our systems should be dealt with; and
- how to report a possible data breach and comply with the company's

#### **Incident Reporting Policy.**

Additional training for those responsible for handling actual or suspected security breaches will include reference to any guidance from the ICO on the handling of data security breaches and the notification of such breaches to the ICO.

#### **Email usage and document protection:**

- how all employees should use email;
- where when and how encrypted email should be used;
- understanding the difference between encryption and password protection.

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### **Data subject access requests:**

- understanding what a Subject Access Request (SAR) is; and Staff Data Protection Training Policy
- what action needs to be taken when a SAR is received.

Additional training will be provided to those at Selkirk BIDS who are responsible for accepting instructions from our clients. Such training will include:

- understanding the lawful reasons for undertaking an investigation;
- the purposes for which personal data can be processed;
- the purposes for which sensitive personal data can be processed;
- what considerations must be taken into account when planning an investigation;
- understanding why and where privacy impact assessments must be undertaken;
- how to undertake a Privacy Impact Assessment;
- awareness of the need to check an individual's identity before providing them with personal data and undertake due diligence;
- the dangers of individuals attempting to obtain or alter personal data by deception;
- other issues that data users should be aware of in relation to data held in relation to the investigations and assignments we undertake; and
- the importance of raising any queries or concerns about the processing of personal data with NDCC Data Protection Officer.

Additional training will be provided to those at Selkirk BIDS who are responsible for marketing and our customer newsletters, this additional training will include:

- what personal data Selkirk BIDS process;
- what consent is required to email a potential customer;
- how to obtain consent;
- when and how privacy notices need to be provided to data subjects; and
- what information should be included in a privacy notice.

Additional training will be provided to those at Selkirk BIDS who are responsible for advising about compliance with employment law obligations or personnel management. The content of such training will be determined by the Board following consultation with the Data Protection Officer

### **FURTHER HELP AND ADVICE**

For more information and advice about this policy contact

Data Protection Officer

Selkirk BIDS

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SELKIRK

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**SELKIRK BIDS**  
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**ICO Scotland contact details**

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