

# **Data Protection Policy**

Date Approved:	30/11/2022 Approved Managing Director By:				
Next Review Due Date:	30/11/2023	Manual ID Number:	BSA006	Version No:	2
Author and Responsible Manager:	Head of Cent	re			
Applicable to:	Staff and Sup	ppliers			
Publication:	Staff SharePo	oint and Websi	te		

## **Document Control**

Version	Date	Author	Notes on Revisions



## **Contents**

Section	Section Title	Page Number
1	Scope and Purpose	3
2	Policy Overview	3
3	Accountability	
4	Linked Policies and Procedures	4
5	Equality Impact Assessment	



#### 1. Scope and purpose

BSA is committed to protecting your personal data - this includes students and staff, former students and staff and the organisations we work with. This policy explains how we collect and use personal data to meet this commitment.

#### 2. Policy Overview

BSA has a responsibility to provide data protection and data security. We are committed to compliance with the requirements of the Data Protection Act 1998/2018 (DPA) and the General Data Protection Regulation (GDPR) and any changes to that legislation.

The General Data Protection Regulations state that data must be:

- processed lawfully, fairly and in a transparent manner.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- accurate and, where necessary, kept up to date.
- kept for no longer than is necessary for the purposes for which they are processed.
- processed in a manner that ensures appropriate security including protection against unauthorised processing, accidental loss, destruction or damage.

To achieve these aims BSA will:

- appoint a designated data protection officer and communicate this role widely within the organisation.
- continue to develop, publish and review processes and resources;
- provide thorough training to all staff.
- ensure open communication and highly visible promotion and guidance.
- only share data when necessary and with organisation who commit to GDPR compliance.



#### 3. Accountability

BSA is a company limited by guarantee and operates as a named data controller and data processor, processing personal data on behalf of other data controllers.

The Directors are ultimately responsible for implementation of data protection legislation but the designated lead for data protection will deal with operational data protection matters and ensure compliance with data protection legislation.

From time-to-time, at the recommendation of the Head of Centre, BSA will engage the support of external data protection experts to ensure processes and practises are current.

#### 4. Linked Policies and Procedures

- Clean Desk and Clear Screen Policy
- Information Security Policy

## 5. Equality Impact Assessment

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. Equality Impact Assessment	Bla		
Impact Assessment for the 4 strands of E	quality, Safeguarding, Health and safety		
and Sustainability			
Initial Form to be completed with Risk As	sessments or as part of a proposal or		
change to a policy, plan or new way of wo	orking		
Title of Activity:	☐ New or ☒ Revision		
Author and Date: Dionne McCann Nov	(Tick as appropriate)		
2020	Expected Implementation Date: Nov 20		
	What is the Review Date: Every Years		
Equality and Diversity.			
Which of the characteristics may be	None, no impact		
impacted upon?			
And, if yes, how has this been considered?			
What are the risks? What are the benefits?			
Safeguarding:			
Are there any aspects of this proposal			
which could cause a Student/member of	☐ Yes ⊠ No		
staff/visitor to feel unsafe?			
If yes, how has this been considered?			
What are the risks? What are the benefits			
Health and Safety:			
Have any risks been identified?	☐ Yes		
If yes, how has this been considered?			
What are the risks? What are the benefits?			
Sustainability:			
Are there expected benefits or impacts on	☐ Yes		
sustainability issues?			
If yes, how have these been considered?			
Evidence:			
What evidence do you have for your			
conclusions and expectations for these	Quality is monitored through both internal		
conclusions?	and external reviews		
How will this impact be monitored for all			
these considerations?			
Is this policy of a high/medium or low	☐ High ☐ Medium ☒ Low		
risk? ·			