LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

DATA HANDLING & PROTECTION POLICY

RESPONSIBILITY: DIRECTORS

Document History

Issue	Date	Details of Amendments/Changes	Responsibility
1	3/10/16	Creation	Daryl Michel
2	4/11/16	Amendments - Policy update and name changed	Daryl Michel
3	4/03/19	Amendments to Details including Partnership & Company	Daryl Michel
4	05/06/21	Reviewed & updated Ltd status in policy & added in ICO reg nr	Roger Lewis

Scope

This policy applies to the Integrated Management System (IMS) operated by Lion Safety Ltd.

Electronic information is a valuable resource which Lion Safety Ltd takes measures to protect from loss or corruption and unauthorised access and modification. In addition, such information is subject to UK law, specifically the eight principles of the Data Protection Act 1998.

Responsibility

It is the responsibility of the Directors to approve this policy and authorise any consequent action.

All employees of Lion Safety have a responsibility to ensure that this policy governs their actions and the actions taken by the company.

All other responsibilities are contained within the document hereafter.

LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

Data Handling & Protection

Lion Safety needs to collect and use certain types of information about the Individuals or Service Users who come into contact with Lion Safety Ltd, in order to carry on our work. This personal information must be collected and dealt with appropriately whether this is collected on paper, stored in a computer database, or recorded on other material. There are safeguards to ensure this under the Data Protection Act 1998.

Data Controller

Lion Safety Ltd is the Data Controller under the Act, which means that it determines what purposes personal information held, will be used for. It is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

Disclosure

Lion Safety Ltd may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Individual/Service User will be made aware in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Lion Safety Ltd to disclose data (including sensitive data) without the data subject's consent.

These are:

- Carrying out a legal duty or as authorised by the Secretary of State
- Protecting vital interests of an Individual/Service User or other person
- The Individual/Service User has already made the information public
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- Monitoring for equal opportunities purposes – i.e. race, disability or religion
- Providing a confidential service where the Individual/Service User's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Individuals/Service Users to provide consent signatures.

Lion Safety Ltd regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

Lion Safety Ltd intends to ensure that personal information is treated lawfully and correctly.

To this end, Lion Safety Ltd will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Specifically, the Principles require that personal information:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
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 by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,

LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information.

Lion Safety Ltd will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom 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
    - The right to prevent processing in certain circumstances and
    - The right to correct, rectify, block or erase information which is regarded as wrong information)
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

Data collection

Informed consent is when

- An Individual/Service User clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data
- And then gives their consent.

Lion Safety Ltd will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Lion Safety Ltd will ensure that the Individual/Service User:

1. Clearly understands why the information is needed
2. Understands what it will be used for and what the consequences are should the Individual/Service User decide not to give consent to processing
3. As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
4. Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
5. Has received sufficient information on why their data is needed and how it will be used

Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers. *(See below for Electronic Information Security.)*

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately. *(See Appendix Document Retention Periods.)*

LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

It is Lion Safety Ltd's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Data access and accuracy

All Individuals/Service Users have the right to access the information Lion Safety Ltd holds about them. Lion Safety Ltd will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Lion Safety Ltd will ensure that:

- It has an assigned Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the ways it hold, manage and use personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

Electronic Information Security

Personnel

Employees must keep their passwords confidential and must not disclose them to any other party.

The Company's computer system is secure system and employees must not attempt to load any software on to it without express permission. On the termination of employment, or at the Company's request, employees must return all information that they have in a computer compatible format to a nominated member of staff.

All information created on computer by employees during the course of their employment with the Company will remain the property of the Company.

Email

The Company gives designated employees access to an email facility in order to improve business communication and efficiency. This is the sole purpose of this facility and personal emails are not permitted.

It is important that emails are not used to spread gossip or to distribute information, jokes or graphics that are or could be said to be, any of the following:

- Sexist or sexual in nature,
- Racist or otherwise discriminatory,
- Blasphemous
- Obscene or offensive
- Defamatory

LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

- Malicious and / or unacceptable in nature

- Otherwise conflicting with the interests and ethos of the Company

The distribution of chain letters by email is expressly forbidden.

Employees must not use emails to distribute information that is confidential in nature, unless the permission of the customer and/or the Company has been given in advance. Employees must not use emails to distribute anything that is copyright protected or to pursue or promote personal business interests. If in doubt, guidance should be sought from a Director.

Messages sent by email could give rise to legal action against the Company. It is therefore important that thought is given to the content of all emails and that hard copies are taken when necessary.

The Company reserves the right to retrieve messages in order to assess whether the facility is being used for legitimate purposes, to retrieve information following suspected computer failure or to investigate alleged acts of wrongdoing. The Company will not, however, monitor emails as a matter of course.

Misuse of the email facility will result in disciplinary action.

Physical

Access to the server / main equipment will be restricted and authority to access these rooms lies with the Directors.

The servers containing corporate information will be held in a secure environment protected by: A Fire detection system, Intruder control measures, low risk of water ingress and surge protection devices.

Networks

All networks will be protected with firewall, router configuration, e-mail scanning and virus protection.

All workstations will have appropriate anti-virus software installed. This must not be turned off without permission.

Back up

All systems are backed up onsite and are also back up offsite by ITEK Systems Management.

Reporting

Staff should report any suspected security breaches to a Director.

These incidents a will be monitored and an appropriate investigation and action plan will be prepared.

ICO

Lion Safety Ltd is registered with the Information Commissioners Office and accept and abide by the ICO's standards of compliance. Our registered is ZA320568

This policy is communicated to all employees and personnel working on behalf of the company and is available for review by any interested party upon request.

Signature of Managing Director(s)	*Date*
	05.07.2021

LION SAFETY LTD
Unit 10, The Courtyard
Callendar Business Park
Falkirk FK1 1XR

T. 01324 47 47 44
F. 01324 48 49 48
E. sales@lionsafety.co.uk
W. lionsafety.co.uk

Witness Signature *Date*

Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information Lion Safety will hold and how it will be held or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person(s) responsible for ensuring that Lion Safety follows its data protection policy and complies with the Data Protection Act 1998.

Individual/Service User – The person whose personal information is being held or processed by Lion Safety for example: a client, an employee, or supporter.

Explicit consent – is a freely given, specific and informed agreement by an Individual/Service User in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about the data processing activities of Lion Safety, as certain activities may be exempt from notification.

The link below will take to the ICO website where a self-assessment guide will help you to decide if you are exempt from notification: http://www.ico.gov.uk/for_organisations/data_protection/the_guide/exemptions.aspx

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within.

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings