

Revision History

Date	Version	Author	Summary of Change	Change made by
15.01.2016	1.0	Chris Scott	New document	CS
17.03.2016	1.1	Chris Scott	New template	SCW

Approval

Date	Version	Approver	Title
15.01.2016	1.0	Phil Miller	Managing director

Introduction

ABCA holds and processes data relating to:

- Customers
- Employees
- Suppliers

As such, we have a legal obligation to protect that data and under the Data Protection Act, we must:

- Only collect data that we need for a specific purpose
- Always keep that data secure
- Ensure that the data is relevant and secure
- Only hold as much data as we need and not keep for a longer time than it is required
- Allow the customer / employee / supplier to see that information on request

If a person or company who we hold data on believes that it has been misused or that we haven't kept it secure, then the first step is for that person or company to contact us and advise us.

We should handle that request according to the procedures outlined in this document. If the person or company who we hold data on is unhappy with our response, then they should contact the Information Commissioner's Office (ICO).

What could be classed as a Data Complaint?

- Unwanted contact attempts
- Customers could deem out contact attempts as nuisance calls
- A nuisance call is an unwanted telephone call, email or text
- Inability to access information we hold
- Customers should be able to access any information we hold about them
- Re-use of information we hold
- Customers information held by us should not be re-used for a purpose other than which it was obtained in the first place
- We have mishandled information
- A customer may make a complaint about how we handle the information we have (e.g. it is wrong or we have disclosed it to a 3rd party)

What information is an individual entitled to?

A request made by someone who wants to see a copy of the data we hold about them is called a Subject Access Request (SAR), and their right to see the data we hold is conveyed on them by the Data Protection Act.

We should act promptly to deal with a SAR and should respond no later than 40 calendar days following receipt of the SAR.

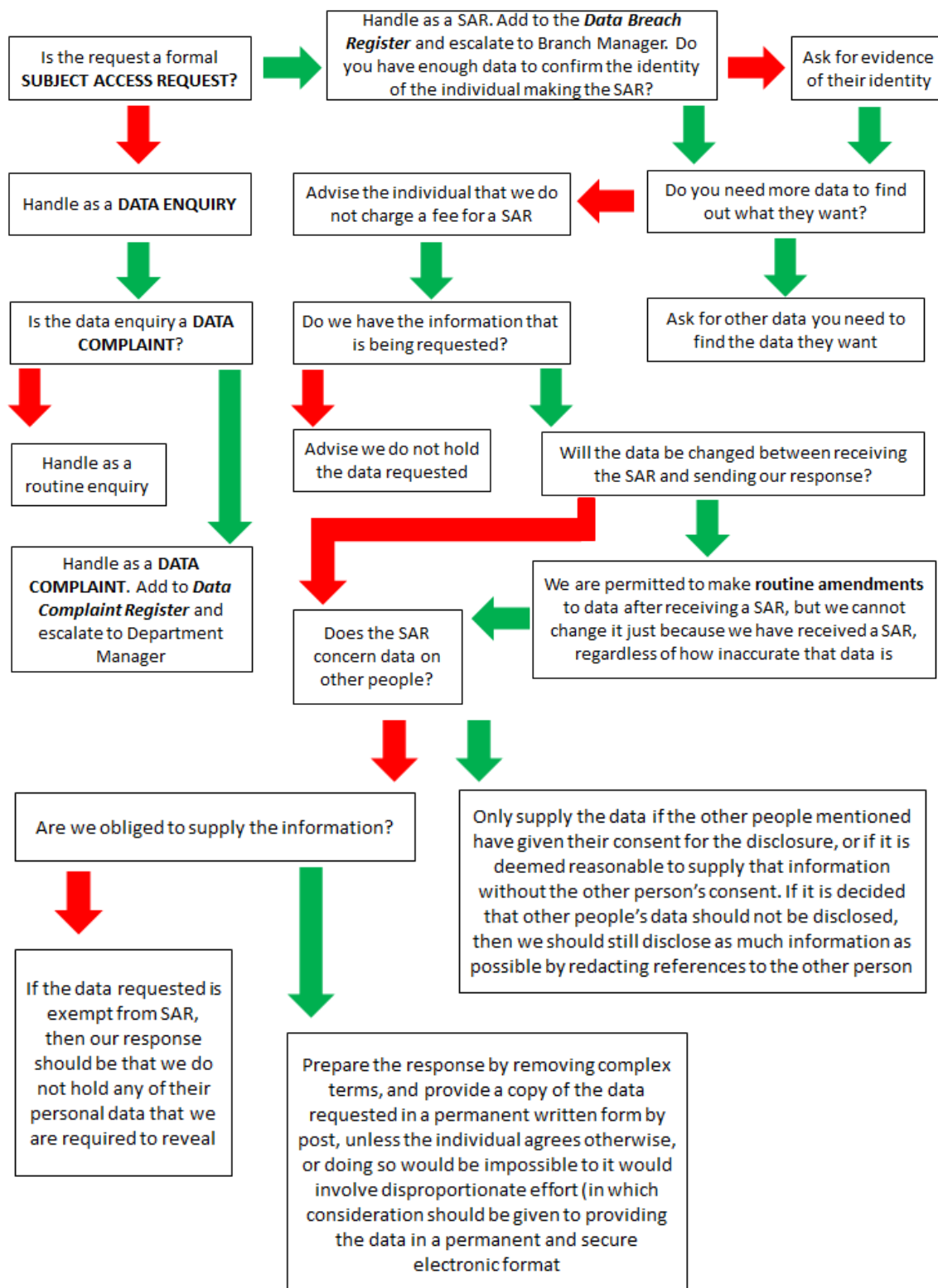
How should you handle a request for information?

All staff are required to have completed Data Protection Training and be able to identify a SAR. The following flow chart should allow you to handle any request for information, be it a SAR, Data Complaint or Data Enquiry.

Ultimately, you should ensure that any Data Breaches or Data Complaints are recorded on the relevant register, and the request is escalated to a Department Manager as soon as is practicable.

The following flow chart is provided as a decision-making tool to be used in receipt of a data request.

- Where the answer to the question is **Yes**, follow the **green** arrow
- Where the answer to the question is **No**, follow the **red** arrow



Employee Signature		Employer signature	
Date		Date	