

Data Protection & Information Governance: Policy Statement

1. Introduction

- 1.1 The Trust takes its responsibilities with regard to data protection very seriously. We recognise that the correct and lawful treatment of personal data will maintain confidence in our organisation and is an essential foundation for successful relationships with others.
- 1.2 We are committed to transparent, lawful and fair proportionate processing of personal data. This includes all personal data we process about customers, colleagues, and those who work or interact with us.
- 1.3 We recognise our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA). We are committed to complying with data protection legislation, and to upholding the six data protection principles. Those principles require that personal data is:
 - processed fairly, lawfully and in a transparent manner.
 - used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
 - adequate, relevant, and limited to what is necessary.
 - accurate and, where necessary, up to date.
 - not kept for longer than necessary; and
 - kept safe and secure.

2. Our approach

- 2.1 We will:
 - 2.1.1 Maintain an Information Governance Framework which sets out the structure and roles that we have in place to support good information governance and personal data protection.

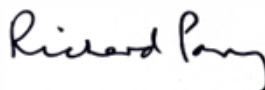


- 2.1.2. Hold and process the minimum personal information we need for our legitimate reasons and only for as long as is necessary for the purposes we have identified.
- 2.1.3. Maintain a schedule of retention and disposal periods for different types of personal data held by the Trust ensuring compliance with legal, fiscal and good practice requirements for records retention.
- 2.1.4. Have in place a process for the secure deletion and destruction of personal information.
- 2.1.5. Assign Information Asset Owners to each information asset throughout our organisation, who support the management of personal data and its associated risks.
- 2.1.6. Publish privacy notices on our website, updating them as required;
- 2.1.7. Provide all staff with appropriate training on information governance and data protection.
- 2.1.8. Have arrangements in place to manage any personal data breaches.
- 2.1.9. Notify the ICO within 72 hours where a breach is likely to result in a risk to the rights and freedoms of individuals.
- 2.1.10. Undertake Data Protection Impact Assessments where appropriate.
- 2.1.11. Ensure that compliance and privacy by design is integral to any project or service we offer.
- 2.1.12. Embed a culture of good information governance through training and communications.
- 2.1.13. Ensure that our contracts are compliant with UK GDPR.



David Orr CBE

Chair to the Board of Trustees



Richard Parry

Chief Executive

23 November 2023