



Data Protection Policy

This Policy sets out the general regulations which govern ABA Procurement's compliance with the Data Protection Act 1998. The policy is supported by specific protocols and procedures to be followed by staff, tutors, agents, clients, partners and students and should be read in conjunction with other policies, Staff Handbook and Learners Handbook. In certain specified instances, these regulations and procedures also apply to clients and of the ABA.

ABA Procurement, its staff, tutors, students, clients, agents, and other associated bodies, as users and/or processors of personal data (computerised and manual), have an obligation to comply with the principles of the Data Protection Act 1998. Under the Act, all individuals, as Data Subjects, have the same rights regarding their personal data.

Management of Compliance

All organisations must notify the Information Commissioner's Office of its intention to process data. ABA's correspondent with the Information Commissioner shall be the Programme Director or authorised deputy.

On a day-to-day basis, the Programme Director shall devolve responsibility for Data Protection matters to the Programme Administrator, who will review the policy when new legislation, which has an impact on personal data, is brought into force.

All contracts with academic partners, vendors, contractors and suppliers must include ABA's data protection protocols, which such Data Users must follow.

It is the responsibility of all managers to ensure that their staff are aware of this policy and their personal obligations under the Data Protection Act.

The Programme Director, shall ensure that notification under the Data Protection Act 1998, appropriate to all aspects of ABA's business, is filed with the Office of the Information Commissioner and is regularly maintained and reviewed, via an annual audit.

A rolling programme of audit will be conducted to ensure that any changes to the range of data since the previous audit is managed effectively.

Any new processing of personal data, during the year, should be notified to the Programme Director for inclusion in ABA's notification.

Current notification is ABA Procurement Ltd A1028031

Code of Practice for Data Users

Under the principles of the Data Protection Act 1998 anyone who uses or processes personal data is a 'Data User'. All Data Users (staff, tutors, students, partners, clients and agents) have an individual responsibility not only to ABA but also to the UK Information Commissioner. Data Users must, therefore, abide by the principles set out in the Act and adhere to ABA's Policy.

The Data Protection Principles:

- i. Obtain and process personal data fairly and lawfully.
- ii. Obtain and process personal data only for one or more specified and lawful purpose or purposes.
- iii. Personal data should be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- iv. Ensure that personal data is accurate and, where necessary, kept up to date.
- v. Hold personal data for no longer than is necessary.
- vi. Process personal data in accordance with the rights of Data Subjects under the Act.
- vii. Take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- viii. Do not transfer personal data 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 Data Subjects in relation to the processing of personal data.

The Anglia Business Academy may be obliged to comply fully with certain requests made by the Police or other Public Authorities (as stated in the Protection of Children Act 1999, the Terrorism Act 2006, and the Mental Health Act 2007).

Staff should neither confirm nor deny if asked for information related to the Terrorism Act. Any such request MUST be sent immediately, in strict confidence, to Programme Director or in his absence to the Company Secretary.

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David Pratt,
Director,