



## Age UK East London

# Data Security & Protection Training Policy

## Version 3.1

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### 1. Introduction

- 1.1 This Policy sets out the obligations of Age UK East London a Private Limited Company by guarantee without share capital use of 'Limited' exemption registered in England under number 07687015, whose registered office is at 2nd Floor 82 Russia Lane, Bethnal Green, London, England, E2 9LU (“the Company”) regarding the training and briefing of trustees, directors, senior managers, managers, employees, agents, contractors, volunteers and other parties working on its behalf.

### 2. Scope

- 2.1 This Policy expands on the requirements in the Company’s Data Security and Protection Policy that:
- a) All Parties (trustees, directors, senior managers, employees, agents, contractors, volunteers and other parties) working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company’s responsibilities under Data Protection Law and under this Policy, and shall be given access to a copy of this Policy;
  - b) All Parties working on behalf of the Company handling Personal Data will be appropriately trained to do so.
- 2.2 All policies and procedures set out in this document must be followed at all times by the Company, and all Parties working on its behalf in all locations.

### 3. Policy Framework

- 3.1 This Policy is part of the Company’s Data Security and Protection Policy Framework.

- 3.2 This policy should be interpreted in conjunction with the Company's primary policy in the framework, the **Data Security and Protection Policy**.
- 3.3 Definitions contained in the Data Security and Protection Policy apply equally to this Policy.

#### 4. Responsibilities

- 4.1 The Company's **Information Governance Lead** is responsible for:
  - a) ensuring compliance with this policy
- 4.2 The Company's **Operations and Human Resources Manager** is responsible for:
  - a) the administration of this Policy
  - b) conducting training needs assessments covering all Staff and other relevant groups
  - c) Organising and monitoring the delivery of appropriate data security and protection training and briefing for all Parties working on behalf of the Company.
  - d) making enquiries of parties Processing Personal Data on behalf of the Company or sharing Personal Data with The Company as to whether their staff are given appropriate and relevant training
  - e) keeping appropriate training records
- 4.3 The Company's **Data Protection Officer** is responsible for:
  - a) providing advice and guidance to the Company on interpretation of this policy
  - b) reviewing this policy and related procedures regularly to ensure that they comply with current data protection legislation and best practice

#### 5. General Training

- 5.1 The Company is responsible for ensuring that all Parties working on its behalf are aware of their personal responsibilities in relation to Personal Data, ensuring that it is properly protected at all times and is processed only in line with the Company's procedures.
- 5.2 To this end, the Company:
  - a) shall ensure that all Parties working on its behalf are given appropriate and relevant briefing and training. It shall be the duty of the Company to organise both specific briefing and training for Parties with responsibility for Processing

- or managing the Processing of Personal Data as well as onboarding training for all Parties and to maintain records of attendance.
- b) will ensure that its contracts with processors and data sharing agreements with partners contain clauses requiring them to provide their staff with appropriate and relevant training.

## **6. Specific Training**

- 6.1 The Company is responsible for ensuring that all Parties who are responsible, on a day-to-day basis, for compliance with the Data Protection Legislation and relevant good practice, are able to exhibit competency in their understanding of the Data Protection Legislation and data security and protection good practice.
- 6.2 All Parties with data security and protection roles and responsibility shall receive appropriate training and all training records are to be maintained by the Company's management team. This provision includes, but is not limited to:
  - a) The Caldicott Guardian
  - b) The Senior Information Risk Owner (SIRO)
  - c) The Information Governance Lead
- 6.3 The Company shall also be responsible for ensuring that all Parties with data security and protection roles and responsibility are regularly informed of and updated on all relevant matters related to Personal Data management and data protection legislation, including through contact with external bodies, the most noteworthy of which are the Information Commissioner's Office (<https://ico.org.uk>) and the Company's Data Protection Officer (DPO) (<https://exigia.com>).

## **7. Implementation and Review**

- 7.1 This Policy shall be deemed effective as of 10<sup>th</sup> June 2021. No part of this document shall have retroactive effect and shall thus apply only to matters occurring on or after this date.
- 7.2 This document will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.
- 7.3 This document will be reviewed regularly and normally at least annually.

7.4 The latest version of this document will be made readily available to all staff and other relevant parties.

## 8. Approval

This document has been approved and authorised by:

**Name:** Geetha Umaasuthan  
**Position:** Director of Finance and Operations  
**Date:** 10/06/21

**Due for Review  
by:** 10/06/22

**Signature:** 

## 9. Change History

Version	Section	Issue	Change	Approval	Date
3.0	All	New Data Security and Protection Framework	Multiple		
3.1	1.1 2.1	Changes in Data Security & Protection Policy	The underlying policy statements, underpinning this policy, have been updated.  In particular, trustees are now included.		
	Multiple	Terminology	Staff replaced with Parties in line with the Data Security and Protection Policy.		



# Appendix A: Course and Schedule

Course	Audience	Frequency	Notes
Data Security and Protection: A Briefing for Trustees and Senior Managers	Trustees and Senior Managers	Annual	