

RVC DATA PROTECTION POLICY

POLICY and PROCEDURES

Responsibility of	Data Protection Officer
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1) Policy Statement

The Royal Veterinary College holds and processes information about employees, students, clients, suppliers and other **Data Subjects**or various academic, administrative and commercial purposes. The College is committed to protecting the rights and freedoms of all our **Data Subjects** to processing their data securely in accordance with our legal obligations.

The RVC will process data in accordance with the six Data Protection Principles, having established and documented a lawful basis for data processing together with an additional condition when processing any Special Category Data.

The RVC will not process data in ways that have an unjustifiably adverse effect on the **Data Subjects** and only handle data fairly and in ways that **Data Subjects** would reasonably expect.

The RVC will implement appropriate technical and organisational measures to ensure and be able to demonstrate that processing is undertaken in accordance with its legal obligations.

The RVC recognizes that data subjects have specific rights relating to the collection and use of their personal data and will ensure that it complies with these individual rights.

The RVC will ensure that it remains in compliance with current UK Data Protection law.

2) Key definitions

General Data Protection Regulat

Under delegated authority from the College Executive Committee, the responsibility for monitoring compliance with the GDPR / current UK Data Protection law, our data protection policy, awareness-raising, training, and audits will rest with the Data Protection Office(DPO).

The College Executive Committee will ensure that:

- x it involves the DPQ in a timely manner, in all issues relating to the protection of PersonalData
- x the DPO's sufficiently well resourced to be able to perform their tasks
- x it does not penalize the DPO for performing their duties
- x it ensures that any other tasks or duties assigned to the DPOdo not result in a conflict of interests with their role as a DPO

7) Data Protection Officer (DPO)

As a Public Authority, the College has a duty to appoint and support a **Data Protection Office(DPQ**. This person reports directly to the College Executive Committee. The requirements of the role and how it be supported are as specified by UK data Protection Law. In accordance with legislation the **DPO's** esponsibility will include but not be limited to:

- x maintaining appropriate registration with the Supervisory Authorit(CO)
- x ensuring that the College fulfils its responsibilities as a Data Controller
- x act as a contact point for Data Subjectand the Supervisory Authority
- x inform and advise on the College's data protection obligations as specified by the current UK Data Protection law
- x putting into place comprehensive but proportionate governance measures (policies / procedures)
- x maintain robust breach detection, investigation and internal reporting procedures
- x keeping a record of Departmental Data Officers in each relevant and accountable area
- x monitoring internal compliance and directing Departmental Data Officerss required
- x establishing the lawful basis (bases) for the processing of data
- x ensuring that with regard to the processing of children's data that appropriate systems and processes are in place in order to address the particular protections appropriate for children
- x provide advice regarding

- x accurate and, where necessary, kept up to date
- x kept in a form that permits identification of Data Subjectsor no longer than is necessary for the stated purposes for processing the data
- x protected against unauthorized or unlawful processing.

12) Security

All **PersonalData** must be processed in a manner that ensures its security. This must include protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. Appropriate technical and organizational security measures must be employed.

13) Privacy Notices

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2) <u>Contract</u>

The choice of lawful basis for data processing does not dictate which special category condition is applicable.

The choice of the specific condition for processing **Special Category** atamust be made in consultation with the **DPO** and, in order demonstrate compliance, all decisions must be fully documented.

The requirements for processing Special Category Datae shown in Appendix 2.

21) Criminal Offence Data

Personal Pata relating to criminal convictions and offences or related security matters must only be processed by anyone responsible for processing data when they are acting in an official capacity or 8

If the breach is likely to result in a high risk of adversely affecting individual's rights and freedoms, the **Data Subject(s)** oncerned must also be advised without due delay.

The DPOwill facilitate the decision-

APPENDIX 2 - Requirements for Special Category Data