



Medipro Limited

DATA PROTECTION POLICY

1. Introduction

This policy sets out how Medipro Ltd handles the data of both employees and students. The Data Protection Act 1998, came into force on 1st March 2000, replacing the Data Protection Act (1984) and certain other legislation that gives rights of access to information held by organisations, including the Access to Personal Files Act (1987). The Data Protection Act extends the rights given to individuals in previous legislation and requires data controllers (people or organisations that hold and process the details of living individuals) to comply with the Eight Principles and to bear in mind the rights and freedoms of those individuals when processing their details.

Whilst legislation places certain responsibilities and requirements on Medipro Ltd to protect personal data, we are also conscious of the sensitivity of people with regards to the information held about them, and will always adhere to a courteous and responsible as well as lawful attitude towards the processing of data acquired.

Medipro Ltd aim to ensure that all appropriate staff are properly trained, fully informed of their obligations under the Data Protection Act and are aware of their personal responsibilities. Medipro Ltd will use the exemptions available to gather the necessary data to provide a training service to its students and share that information with other agencies, where it is legal to so do. Any information sharing arrangements concerning student confidential data will be based upon formal protocols and will be in accordance with the Data Protection Act's eight Data Protection principles. Medipro Ltd will secure and maintain data in accordance with the Data Protection Act, which is necessary to assist in the protection of the health and safety of its staff while continuing to comply with obligations to students and others under the Data Protection Act.

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All staff are expected to comply with the policy and seek advice from Admin when required. This policy is subject to regular review to reflect, for example, changes to legislation, or to the structure or policies of the organisation.

2. Scope

This policy covers all personal information that is stored in a relevant filing system. This policy is applicable to all staff/students, companies and other third parties holding, storing or using information on behalf of Medipro Ltd.

3. Objectives

The main aims of this policy is to:

- To provide a framework to manage Data Protection Act, 1998 requirements
- To provide guidance to Medipro Ltd staff/students and third parties that explains the requirements of the Act and their responsibilities with regard to managing an individual's personal information.

4. Collection of Data

Medipro Ltd needs to collect and use certain types of information about people with whom it deals, in order to operate and comply with legislation and any external policies or requirements it may be bound by. These include current and past medical histories of patients, personal contact details of students, social histories, staff details etc.

This personal information must be dealt with properly regardless of how it is collected, records and used, whether on paper, electronically, or other means, and there are safeguards to ensure this within the Data Protection Act 1998.

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Medipro Ltd highly regards the lawful and correct treatment of personal information by us as important to the achievement of our objectives and to the success of our operations, and to maintaining confidence between those whom we deal with and ourselves.

5. Data Protection Act Principles

Medipro Ltd adheres to the eight Principles within the Data Protection Act 1998:

1. Data shall be processed fairly and lawfully, and in particular will not be processed unless specific conditions are met
2. Data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
3. Data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
4. Data shall be accurate and, where necessary kept up to date
5. Data shall not be kept for longer than is necessary for the specified purpose or purposes
6. Data shall be processed in accordance with the rights of data subjects under the Act
7. Data shall be subject to appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data, or the accidental loss, destruction or damage to personal data
8. Data shall not be transferred to a country or territory outside the European Economic Area unless that country ensures an adequate level of protection for the rights and freedoms of the data subjects in relation to the processing of personal data

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6. Data Sharing

External sharing

On occasion, Medipro Ltd may have a legal or policy based obligation to share certain information held during operation and/or co-operation with external agencies.

Such information held by Medipro Ltd is usually by way of Application Forms which are legal documents about a particular student and their encounter with Medipro Ltd staff.

If access to controlled data is needed by an external authority, the external authority must request the information correctly and Medipro Ltd will then apply a set test to consider the request.

The process is as follows:

- The external authority makes a request for controlled data to Medipro Ltd by way of an official letter. Telephone and email requests are never acceptable.
- The letter must detail the reason(s) for the request, what the organisation intends to do with it or how it will use the information, and how it will protect the information once provided to them.
- Medipro Ltd will acknowledge the request in writing and will then consider the request, with appropriate legal advice if necessary.
- If the request is deemed reasonable, the data subject will be informed in writing of the decision of Medipro Ltd to release the data.
- The information will be provided to the external authority via a mutually agreeable method that is safe and trusted.
- If the request is denied by Medipro Ltd, a letter detailing the reasons for the decision will be sent to the external authority.

There are specific instances where this framework will not apply, for example, with regards to the course of a police or medical investigation. Such instances require by

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law that we co-operate with the concerned body if we believe the data will be used responsibly to prevent or deter crime.

Internal sharing

Controlled information always needs to be shared internally within Medipro Ltd and its departments for the purposes of student advice and liaison, support and general enquiries.

On such occasions members of staff are required at all time to respect and keep safe personal data and only share it with other staff who must have access to it. Data is always transferred between departments securely and confidentially with the use of electronic methods, password protected computer and database access and encryption to ensure that only authorised staff can view information.

All information is always securely stored and information pertaining to students is stored for a period of 10 years.

7. Subject Access Requests

Where Medipro Ltd holds any data about a person then that person has a right to request access to this data and to know what details we hold about them.

Some generic student details will be held such as student names, addresses, contact details, medical and drug history etc.

Employee details will be for purposes connected with employment, including recruitment and termination of employment. The sort of information we will hold includes information for payroll purposes, references, contact names and addresses and records (including, for example, disciplinary records) relating to your career with the company, information about health for the purposes of compliance with health and safety and occupational health obligations; considering how an employee's

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health affects ability to do the job or the health of a student to study and, if disabled, whether any reasonable adjustments to be made to assist at work.

To find out if we hold any information about a person a 'Subject Access Request' must be made to Medipro Ltd in writing.

You have the right, on written request to the following:

- to be informed whether personal data about you is being processed, whether by the company or someone else on its behalf;
- to be given:
 - a description of the personal data that are being processed;
 - a description of the purposes for which the data are being processed; and
 - details of all recipients or classes of recipients to whom they are or may be disclosed;
- to have communicated, in an intelligible form, any information held about you by the company, as well as any information available to the company as to the source of this information. If the information is not in an intelligible form, for instance if it contains codes, you will be given an explanation of the information. The information will be provided in a permanent form unless this is impossible, would involve a disproportionate effort or you agree to some other form. The copy will usually be a printed paper copy, but can also be provided in other ways, for example, on disk or via e-mail;

In the case of employees, the company will charge £10.00 to cover administration costs. The company will comply with the request within 40 days.

If the company has already complied with an identical or similar request the company does not have to respond to repeated demands until a reasonable period has elapsed

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or new information has been added to the file, for example, if the individual has been subject to an investigation or disciplinary hearing.

In the case of students, the company will charge £50.00 to cover administration costs.

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