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## LIFT Community Grants Programme Requests for Personal Information – Data Protection Policy

### Purpose

This policy sets out the commitment of the LIFT Community Grants programme to dealing with all requests for information under Article 15 of the General Data Protection Regulation and Chapter 3 (93) of the Data Protection Act 2018 in accordance with the requirements of the Regulations.

While this data protection policy is specific to the LIFT Community Grants programme, as a programme lead delivered by Norfolk County Council the policy will be in line with the data protection policy of the Council.

Norfolk County Council has legal obligations to respond to requests from individuals and other organisations within a time-limit.

<p>The General Data Protection Regulation</p>	<p>Requests from an individual for information about themselves, including details of personal information held, reasons for holding it and who it is shared with</p> <p>Requests from an individual for other rights include:</p> <ul style="list-style-type: none"> <li>The right to be informed</li> <li>The right to rectification</li> <li>The right to erasure</li> <li>The right to restrict processing</li> <li>The right to data portability</li> <li>The right to object</li> <li>Rights in relation to automated decision making and profiling</li> </ul>	<p>One calendar month from the day after the request is received and is considered a valid request</p>
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## **The LIFT Community Grants programme is committed to:**

- Ensuring that individuals' rights to their own personal information can be appropriately exercised
- Providing adequate training for staff
- Taking responsibility for personal information to ensure this
- Ensuring that everyone handling personal information knows where to find further guidance on individuals' rights to their own personal information
- Ensuring that queries about individuals' rights to their own personal information are dealt with effectively and promptly

## **Who this policy applies to**

This policy applies to:

### **People**

- All staff (including all permanent and temporary employees, agency and casual staff)
- Volunteers, students, interns and trainees doing placements with the LIFT Community Grants programme at the County Council
- Third parties doing business with the County Council such as contractors and sub-contractors or acting jointly or in partnership with the County Council

### **Premises**

- All premises used by the County Council for business or storage
- Anywhere that any of the people listed above work away from County Council premises

### **Systems**

- The deployment and use of the County Council's electronic systems including all computers, peripheral equipment, software, memory devices, tablets, smartphones *etc.*
- All use of computer networks or other systems for sending information
- Security of hardware, software and information, and the security of assets that may be placed at risk by misuse of the information systems

### **Information**

- All information, held in any format - electronic, paper, fax, microfiche, or any other format

For the LIFT Community Grants programme Suffolk is the sole sub-contractor.

## **Who has responsibility for Information requests?**

All staff are responsible for ensuring that any request for information they receive is dealt with in line with the requirements of the General Data Protection Regulation in compliance with this policy.

Anyone who receives enquiries from members of the public, staff or other organisations requesting their own or someone else's personal information held by the LIFT Community Grants programme and therefore Norfolk County Council.

All staff have a responsibility to recognise a request for information and ensure it is passed to the Information Compliance Team within two working days.

The County Council's Information Compliance Team manages and coordinates all requests for information received by the County Council. Any requests for information should be sent directly by email to [information.management@norfolk.gov.uk](mailto:information.management@norfolk.gov.uk).

The Information Management Service is responsible for ensuring the policy is kept up-to-date and that it is accessible to all staff across the organisation via the intranet.

There are some officers with specific responsibilities:

Data Protection Officer	<p>Appointed under the General Data Protection Regulation the DPO assists with monitoring compliance, informs and advises on data protection obligations, provides advice on Data Privacy Impact Assessments and acts as contact point.</p> <p>The DPO is independent and an expert in data protection and reports to the highest management level.</p> <p>The DPO helps demonstrate compliance and are part of the enhanced focus on accountability.</p>
Managing Director	<p>Responsible for ensuring the County Council's compliance with legislation, regulation and guidance</p>
Senior Information Risk Owner (SIRO)	<p>The Executive Director of Finance is the County Council's Senior Information Risk Owner (SIRO)</p> <p>Responsible (as delegated by the Managing Director) for ensuring effective systems and processes are in place to deliver the information security agenda</p> <p>Responsible for reporting any relevant information risk to the County Leadership Team</p>
Caldicott Guardians for Children's Services and Adult Social Services information	<p>Responsible for ensuring that the County Council handles service users' information in accordance with legal and ethical practice</p>
Directors/Heads of Service	<p>Information Asset Owners (IAOs) for the service</p> <p>Responsible for information held by the service</p> <p>Accountable to the Managing Director for ensuring the effective implementation of this policy in their service</p>
Managers	<p>Responsible for ensuring that the staff they manage have completed all necessary training, have read and understood all relevant policies and procedures and that they follow these procedures in carrying out their work</p>

Information Compliance Group/BI and IM	Responsible for agreeing policies and procedures Responsible for the implementation and monitoring of policies and procedures
Information Compliance Manager	Responsible for assisting in monitoring compliance with this policy Responsible for advising staff on compliance with the procedures supporting this policy

### **Implementation**

This policy along with the policies, procedures and guidance in Appendix A below will provide a framework for all staff.

This policy will be made available to all staff via the independent LIFT Community Grants programme website.

All LIFT Community Grants programme staff will undertake and complete the online induction e-learning on data protection. The 'Data Protection Essentials' course will explain to staff their responsibilities under the General Data Protection Regulation (GDPR) and will give them the confidence to correctly handle personal information in their Community Grant work.

### **Review of Policy**

This policy will be reviewed, and revised if necessary, at least once every eight months from the signing of the Community Grant Contract, or more often as necessary according to requirements.

Named Individual in charge of policy review and revision: LIFT Project Manager

Version No.	Published Date	Review Interval	Review Date Due	Actual Review Date	Reviewer Name	Approver Name	New Version No.	Comments
1	1/4/18	8 Months	15 Dec 2019					

### **References**

The General Data Protection Regulation

### **Further Information**

For further information on the LIFT Community Grants programme including access to further programme policies, please contact: [lift@norfolk.gov.uk](mailto:lift@norfolk.gov.uk)



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## Appendix A

Procedure Document	What it covers	Who it applies to
<p><b>‘How to identify a request for information’</b></p>	<p>How to recognise a request for an individual’s personal information or for requests from an individual for other rights which include:</p> <ul style="list-style-type: none"> <li>The right to be informed</li> <li>The right to rectification</li> <li>The right to erasure</li> <li>The right to restrict processing</li> <li>The right to data portability</li> <li>The right to object</li> <li>Rights in relation to automated decision making and profiling</li> </ul>	<p>All CG staff</p>
<p><b>‘What to do when you receive a request for information’</b></p>	<p>How to recognise a request, and actions to be taken with associated timescales</p>	<p>All CG staff</p>
<p><b>‘What to do if the Compliance Team asks you for information’</b></p>	<p>Actions to be taken and associated timescales</p>	<p>All CG staff</p>