



Data Protection Policy

Navy Cadet Force

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DATA PROTECTION POLICY

POLICY STATEMENT

NCF policies and procedures will be written in accordance with the approved format and published on the NCF website, allowing access to all staff. They will be periodically reviewed to ensure compliance with prevailing legislative and ethical requirements.

A policy is a succinct statement setting out the NCF' position or desired position in relation to a relevant and significant issue.

Policies are to be signed off by the Staff Officer Compliance. They will be compliant with prevailing legislative and ethical requirements.

APPLICATION

This policy applies to all data of a personal nature held by the NCF or members of the NCF in relation to their work within or on behalf of the NCF.

INTRODUCTION

This policy has been developed to ensure that all staff have a clear understanding of the data protection requirements placed upon them and to ensure the accuracy, integrity, availability and confidentiality of all information held by the NCF. Staff must be aware that non-compliance with legislation and Policy could result in criminal proceedings, and/or disciplinary action.

The aims of the policy are to provide a framework to guide the direction that the NCF should take in managing the collection, storage, use, dissemination and disclosure of personal data.

The management of Data Protection requires time, authority, resources and expertise to complete the tasks necessary to help ensure that the NCF complies with the requirements of data protection and associated legislation. This will ensure that the NCF, as the designated Data Controller, and individual members of staff are not vulnerable to criminal or civil actions.

Increasingly, the NCF is dependant upon a wide range of information, including sensitive personal data, held in both computer systems and manual files, for its strategic and managerial decisions.

In addition to this, there are legislative requirements to be met by the NCF, in the area of Data Protection and Information Security.

It is necessary to demonstrate to external agencies, the public, and to all staff, that in accordance with the Data Protection Principles, all information held by the NCF will fall under the five disciplines set down by the legislation:

- ✓ Accurate,
- ✓ Secure,
- ✓ Up-to-date,
- ✓ Valid, and
- ✓ Properly managed.

This policy acknowledges and reflects Current Data Protection and associated legislation

DATA PROTECTION POLICY STATEMENT

Acknowledging the vital nature of a wide range of information, including personal data, in supporting the effective running of the organisation, the NCF will ensure that it processes personal data in accordance with current Data Protection legislation. Compliance with this policy is the duty of all staff and members of the NCF, cadets and other volunteers.

The NCF' policy takes full account of the requirements of Data Protection legislation, and the information needs of the NCF.

POLICY AIMS

The following aims have been developed to assist compliance with the policy:-

1. To ensure that every member of the NCF is provided with the means to gain an adequate understanding of Data Protection and associated legislation;
2. To ensure that the NCF's disclosure requirements and authorities are clearly defined;
3. To ensure that comprehensive procedures exist to enable the NCF to meet it's obligations in respect of data subject rights.
4. To ensure that all information processing systems are compliant with the relevant legislation; and
5. To ensure that legislative, policy and compliance requirements and associated responsibilities are properly documented and readily accessible to all staff.

Each of these aims is dealt with in detail below:

1. To ensure that every member of the NCF is provided with the means to gain an adequate understanding of Data Protection legislation and the requirements of national and local Data Protection policies.

Only by ensuring that all staff are aware of the Data Protection requirements, will the NCF have fully discharged its responsibilities with regard to Data Protection. The majority of staff within the NCF will come into contact with personal data of some kind, even if this is not directly from an information system. It is therefore vital that they have been made aware of their responsibilities. This will not only include full and part-time members of staff, but also those working on a voluntary, temporary or contract basis.

Actions:

- Establish a Data Protection Section on the NCF website for the promulgation of all relevant material.
- Assist the XO in the development of suitable Data Protection training material for publication and distribution within the NCF; and

- Establish effective communication and liaison arrangements within the NCF on Data Protection matters through the Regional Officers

All new staff to receive during their initial training, a Data Protection Awareness session. A staff guide to Data Protection will be issued to all new staff on appointment. The staff guide will also be available to staff members via the NCF Website.

Literature, including posters, leaflets and newsletters will be produced and distributed to ensure that staff awareness of data protection issues is raised and maintained.

2. To ensure that the NCF's disclosure requirements and authorities are clearly defined;

It is possible that the nature of the information is such that it has value to other individuals, groups and organisations. Many staff are unaware of what the NCF expects with regard to the disclosure of information.

Actions:-

- Establish procedural guidance to ensure the avoidance of unauthorised and unlawful disclosure of personal data.
- Establish a formal NCF mechanism to consider and decide upon disclosure issues.
- Consider training needs.

3. To ensure that all information systems are compliant with the relevant legislation.

There is a need to ensure that all personal data held by the NCF is processed in accordance with the Principles of the Data Protection Act. These eight Principles state that personal data shall be:

- I. Obtained and processed fairly and lawfully;
- II. Held for specific purpose(s) and not further processed in any way incompatible with the purpose(s);
- III. Adequate, relevant and not excessive for the purpose(s);
- IV. Accurate and, where necessary, kept up to date;
- V. Not kept longer than necessary;
- VI. Processed in accordance with the rights of the data subject; and
- VII. Kept secure and properly protected against loss.
- VIII. Subject to restrictions on transferral outside the European Economic Area.

Actions:

- Establish inspection procedures to ensure that all systems in which personal data are processed are known and compliant.
- Ensure that all systems have management ownership and that managers are aware of their compliance responsibilities.
- Ensure that comprehensive procedures exist to enable the NCF to properly meet its obligations in respect of subject rights.
- Develop and conduct a programme of monitoring and auditing of all information systems.

4. To ensure that legislative, policy and compliance requirements and associated responsibilities are properly documented and readily accessible to staff.

Actions:-

- Review the extent and quality of existing documentation.

5. To ensure that legislative, policy and compliance requirements and associated responsibilities are properly documented and readily accessible to all staff.

LEAD RESPONSIBILITIES

The lead officers for Data Protection is the XO and the Staff Officer Compliance who, will oversee compliance and in particular, ensure that:-

- This policy is reviewed every two years and examine progress on each of the actions supporting the aims.
- Compliance and policy issues arising are properly considered and dealt with.
- The Data Protection profile in the NCF is maintained at an appropriate level and
- That **all** units are registered with the Information Commissioner and have suitable systems in place to ensure that they are dealing with personal data in an appropriate manner.

EXCEPTIONS

None

POLICY OWNER

The policy falls under the remit of the XO.

REVIEW DATE

The policy will be reviewed within two years of the date of the signature of the Colonel of the NCF, unless there is a need to review it before that time.

It is important that all Staff Officers, Commanding Officers ensure that they are working to the most recent copy of the policy. Care must be taken in respect of printing off the policies to ensure that the copy held is the current version.

These can be found on the NCF' website. Should you be in any doubt please contact the NCF' Administration Officer.

The Responsibility of this Policy falls to the Colonel of the Navy Cadet Force.



Signed:

Date: January 2023

Print: Colonel Terry Fitzgerald

This Policy has been approved for distribution by the Chairman of the Navy Cadet Force.



Signed:

Date: January 2023

Print: Luke Giles