



Data Protection Policy

V6.0

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Document Ref: LS/ POL-05/ VR- 6.0

Issue No: 3

Date of Issue: 29th May 2024

Distribution List:

This Data Protection Policy is communicated to all employees. A copy is available at the Head Office, held in the sites, and published on the internal company shared drive. All employees are encouraged to read it and communicate any queries to a director.

Document Control:

Number	Comments	Review Date
V1.0	Original Version (Draft)	25 May 2020
V1.1	Signed off	26 May 2020
V2.0	Update and Review	30 Nov 2020
V3.0	Update and Review	30 Nov 2021
V4.0	Update and Review	30 Nov 2022
V5.0	Update and Review	01 Apr 2023
V6.0	Update and Review	23 May 2024

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1. Introduction

Leverage Enterprises Ltd need to collect and process personal data about people with whom it deals to carry out its business and provide its services. Such people include but are not limited to employees (present, past and prospective), clients, suppliers and other business contacts. The data may include identifiers such as name, address, email address, data of birth, National Insurance Number etc. It may also include private and confidential information, and special categories of personal data.

Leverage Enterprises Ltd is determined to comply with the European General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA2018) which implements the GDPR in the UK.

The lawful and proper treatment of personal information by Leverage Enterprises Ltd is extremely important to the success of our business and to maintain the confidence of our service users and employees. Leverage Enterprises Ltd must ensure that it processes personal information lawfully and correctly.

2. Data Protection Principles

NHS England and NHS Improvement fully support and must be able to demonstrate compliance with the six principles of the Act which are summarised below:

- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.
- Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Information covered by data protection legislation

GDPR definition of "personal data" covers any information relating to an identified or identifiable natural person – i.e. living individuals. Pseudonymised personal data is covered, however anonymised or aggregated data is not regulated by the GDPR or DPA2018, providing the anonymisation or aggregation has not been done in a reversible way.

Individuals can be identified by various means including their name and address, telephone number or Email address, NHS Number, NI Number

The GDPR defines special categories of personal data (previously referred to as sensitive personal information) as information related to:

- Race Or Ethnic Origin
- Political Opinions
- Religious Or Philosophical Beliefs
- Trade Union Membership
- Genetic Data
- Biometric Data
- Health Data
- Sexual History And/or Sexual Orientation
- Criminal Data

4. Scope

All our employees are within the scope of this policy.

5. Roles and Responsibilities

5.1. Action Plan

- Implement the requirements of the Data Controller
- Ensure that an appropriate framework is in place encompassing relevant roles within the organisation that have responsibility for data protection, including the Data Controller
- Provide training for all staff members who handle personal information and ensure access to further guidance and support
- Provide clear lines of report and supervision for compliance with data protection

- Carry out regular checks to monitor and assess new processing of personal data and to ensure the Leverage Enterprises Ltd improvement notification to the information Commissioner is updated to take account of any changes in processing of personal data
- Develop and maintain procedures to ensure compliance with data protection legislation, to cover for example:
 - o Data protection impact assessment
 - o Managing responses to subjects' rights requests
 - o Management of personal data breaches
 - o Provision of privacy information
 - o Training and compliance testing
- Maintain a record of processing activities
- Ensure the organisation complies with its transparency and fair processing obligations in relation to data subjects' personal data.

5.2. The Data Controller

Leverage Enterprises Ltd has Data Controller. The Data Controller is responsible for handing data, providing advice, monitoring compliance, and is the first point of contact in the organisation for data protection matters. Data Controller reports to Managing Director.

5.3. Employees Responsibilities

All employees will, through appropriate training and responsible management:

- Observe all forms of guidance, codes of practice and procedures about the collection and use of personal information.
- Understand fully the purposes for which Leverage Enterprises Ltd uses personal information.
- Collect and process appropriate information, and only in accordance with the purposes for which it is to be used by Leverage Enterprises Ltd to meet its service needs or legal requirements.
- Ensure the information is destroyed (in accordance with the provisions of the Act) when it is no longer required.
- On receipt of a request by or on behalf of an individual for information held about them, or any other data subject's rights in relation to their personal data, staff will immediately notify their line manager and the customer contact centre and abide by the Procedure for managing personal data requests.
- Not send any personal information outside of the United Kingdom without the authority of the Data Controller.
- Understand that breaches of this Policy may result in disciplinary action, up to and including dismissal.
- Section 170 (1) of the Data Protection Act 2018: Unlawful obtaining etc of personal data, states it is an offence for a person knowingly or recklessly:
 - o To obtain or disclose personal data without the consent of the controller
 - o To procure the disclosure of personal data to another person without the consent of the controller, or
 - o After obtaining personal data, to retain it without the consent of the person who was the controller in relation to the personal data when it was obtained

6. Monitoring

Compliance with the policies and procedures laid down in this document will be monitored via the Data Controller and the Managing Director, together with independent reviews from Internal Audit.

7. Reporting and Reviewing

We will measure our progress on an ongoing basis through regular reports to the Board.

We will review our policy at least annually. We will incorporate any necessary changes and reissue the policy accordingly. Any major changes will be rolled out to all staff.

8. Equality Impact Assessment

This document forms part of Leverage Enterprises Ltd Improvement's commitment to create a positive culture of respect for all staff, clients and related businesses. The intention is to identify, remove or minimise discriminatory practice in relation to the protected characteristics (race, disability, gender, sexual orientation, age, religious or other belief, marriage and civil partnership, gender reassignment and pregnancy and maternity), as well as to promote positive practice and value the diversity of all individuals and communities.

As part of its development this document and its impact on equality has been analysed and no detriment identified.



Signed By:
Mohammad Furqan Alam
Managing Director

Date: 29th May 2024