



# CVQO Data Protection Policy

## 1. Policy Overview

The Cadet Vocational Qualification Organisation (CVQO) is committed to full compliance with the [Data Protection Act 1998](#) [“the Act”] and recognises in full the rights and obligations established by the Act in relation to the management and processing of personal data. This policy sets out what CVQO does in practice to meet its data protection obligations.

## 2. Data Protection Act Responsibility

In accordance with CVQO’s standard records management practice, the [CVQO Data Protection Officer](#) is responsible for the general development, promotion, and adherence to this policy, although ultimate responsibility for compliance lies with each Head of Department.

Using information and guidance provided by the CVQO Data Protection Officer, all CVQO staff who are likely to process personal data in any way are expected to:

- understand and adhere to the eight [Data Protection Principles](#) set out in the Act;
- read, understand and manage personal data in accordance with the [staff](#) and [learner](#) data protection “collection notices”, which set out the purposes for collecting an individual’s personal information, how it is used while in CVQO’s possession, and the process for retaining the information;
- manage all records in accordance with the relevant records retention schedule to ensure personal information is not retained longer than necessary; and dispose of and/or destroy confidentially where necessary those records that have reached the end of their retention period.

## 3. CVQO Compliance with the [Data Protection Principles](#)

CVQO is committed to the eight [Data Protection Principles](#) set out in the Act. Specific procedures, processes and mechanisms are in place to ensure that the management of personal data adheres to these principles.

The CVQO Data Protection Officer provides a central and focal point for promoting good management of personal data and for upholding the rights established in the Act. The CVQO Data Protection Officer publishes online information about the Act and its provisions, including an online [Data Protection Act Good Practice Guidance](#). All online information is published via designated data protection webpages.

Staff and learners are provided with a collection notice when they commence employment or register as a learner (also published online), which sets out the purposes for collecting an individual’s personal information, how it is used while in CVQO’s possession, and the process for retaining the information. Personal data are only ever processed in accordance with this statement.

[Subject Access Requests](#) are managed in accordance with specified and established procedures. The procedures are published online.

The CVQO Data Protection Officer establishes, implements and monitors adherence to records management policies, procedures and accompanying retention schedules to ensure personal data are not retained longer than necessary.

In order to prevent unauthorised processing, or accidental loss, damage or destruction, records that hold staff personal data are stored in locked filing cabinets and learner personal data are stored in a restricted area. Access to CVQO’s computer drives, applications and servers is managed by password only, and CVQO operates strict Electronic Information Security and Records Disposal Policies.



#### 4. Annual Notification

The CVQO Data Protection Officer is responsible for submitting the annual notification to the Office of the Information Commissioner.

The notification process confirms that CVQO is processing personal data and describes in general terms the categories of data being held.

#### 5. Subject Access Requests

CVQO recognises the right of all Data Subjects to access information held about them by CVQO and has an established procedure for responding to requests for access to such information. Data Subjects (or their nominee) are asked to submit a written request to CVQO Data Protection Officer. It is usually CVQO's policy to make a charge of £10 for each Subject Access Request made under the Act. CVQO aims to comply with requests for access to personal information as quickly as possible, and ensures that information is provided within the statutory 40-day limit unless there is good reason for delay.

CVQO reserves the right not to release any information, and the 40-day deadline period does not commence until: CVQO has received payment, CVQO has received adequate information to identify the individual requesting the information, and CVQO is satisfied that the request is a genuine request made by or with the knowledge and consent of the Data Subject.

Data Subjects are always informed about the progress of their request, including any decision not to release any data or any reason(s) for delaying a response.

#### 6. Complaints Procedure

CVQO has in place a specific complaints procedure to ensure individuals concerned about any aspect of the management of personal data by CVQO are able to raise their concerns in a fair and equal way. This procedure is published online and/or available from the Records Management Office upon request.

#### 7. Data Protection Awareness

The CVQO Data Protection Officer is responsible for ensuring that adequate and appropriate knowledge of the Act and CVQO's legal obligations is available across CVQO. The means for performing this function include the Records Management policy, adhoc training sessions to relevant groups, the new staff induction programme, and adhoc individual advice as appropriate.

#### 8. Policy Review

In accordance with CVQO's standard records management practice, the policy is reviewed every three years to ensure it meets effectively CVQO's operational and legal requirements.

**Policy Agreed:** Autumn 2006

**Policy Effective from:** Spring 2007

**Policy due for renewal:** Autumn 2009