

CWD Data Protection Policy

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1. Introduction

Charisma Workforce Development (CWD) holds and processes information about employees, delegates, and other data subjects for training, administrative and commercial purposes. When handling such information, Charisma, and all staff or others who process or use any personal information, must comply with the Republic of Sudan, National Information Centre (NIC) Legislation 2010 and the Data Protection Principles which are set out in the **Data Protection Act 1998 (the Act)**

In summary these state that personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorized access, accidental loss or destruction.
- Not be transferred to another country, unless that country has equivalent levels of protection for personal data.

1.2 Definitions

- “**Staff**”, “**Delegates**” and “**other data subjects**” may include past, present and potential members of those groups.
- “**Other data subjects**” and “**third parties**” may include contactors, suppliers, contacts, referees, friends or family members.
- “**Processing**” refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

2. Notification of Data Held

Charisma shall notify all staff and delegates and other relevant data subjects of the types of data held and processed by the Training Center concerning them, and the reasons for which it is processed. When processing for a new or different purpose is introduced, the individuals affected by that change will be informed.

3. Staff Responsibilities

3.1 All staff shall

- Ensure that all personal information which they provide to Charisma in connection with their employment is accurate and up-to-date;
- Inform Charisma of any changes to information, for example, changes of address;
- Check the information which Charisma shall make available from time to time, in written or automated form, and inform Charisma of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. The Centre shall not be held responsible for errors of which it has not been informed

3.2 When staff hold or process information about delegates, colleagues or

other data subjects (for example, students' course work, ID records, references to other Training process, or details of personal circumstances), they should comply with the Data Protection Guidelines.

3.3 Staff shall ensure that

All personal information is kept securely;

- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.
- When staff supervise delegate's doing work which involves the processing of personal information, they must ensure that those delegates are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

4. Delegates Responsibilities

4.1 All delegates shall

- Ensure that all personal information which they provide to Charisma is accurate and up-to-date;
- Inform Charisma of any changes to that information, for example, changes of address;

- Check the information which Charisma shall make available from time to time, in written or automated form, and inform Charisma of any errors or, where appropriate, follow procedures for up-dating entries on computer forms.
- Charisma shall not be held responsible for errors of which it has not been informed.

4.2 Delegates who use Charisma computer facilities may, from time to time, process personal information (for example, in course work or research). In those circumstances, they must notify training department, who will provide further information about this requirement.

5. Rights to Access Information

5.1 Staff, delegates and other data subjects in Charisma have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files.

5.2 Charisma aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the designated data controller to the data subject making the request.

6. Subject Consent

6.1 In some cases, such as the handling of sensitive information or the processing of research data, Charisma is entitled to process personal data only with the consent of the individual. Agreement to Charisma processing some specified classes of personal data is a condition of acceptance of delegates on to any course, and a condition of employment for staff

7. Sensitive Information

7.1 Charisma may process sensitive information about a person's health, disabilities, criminal convictions, race or ethnic origin, or trade union membership to ensure that staff are suitable for the job, and delegates for the courses offered. Charisma may also require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy.

7.2 Charisma also asks for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma or

Diabetes. Charisma will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency.



8. The Data Controller and the Designated Data Controllers

8.1 Training Department is the data controller, and the Principal is ultimately responsible for implementation. Responsibility for day-to-day matters will be delegated to the Administration Department as designated data controllers. Information and advice about the holding and processing of personal information is available from the Administrative Assistant.

9. Retention of Data

9.1 Charisma will keep different types of information for differing lengths of time, depending on legal, academic and operational requirements.

10. Compliance

10.1 Compliance with the Act is the responsibility of all delegates and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Administrative Assistant.

10.2 Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the designated data controller initially. If the matter is not resolved it should be referred to Human resource coordinator or delegate complaints procedure.

Hamid Abuzaid

Managing Director

Charisma Workforce Development

1st June 2016