

Data Protection Policy

Dixon Searle Partnership Ltd (“DSP”) is committed to adhering to best practice in respect of the processing of personal data provided to the company through the course of its business.

Applicable Laws and Principles

Personal data will only be collected and processed by DSP in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) coming into effect in the UK on 25 May 2018. We have referred to advice available on website of in the drafting of this policy and associated privacy statements. The GDPR includes the following rights for individuals which we will consider at all times:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

To comply with the GDPR principle of ‘Data Protection by Design and Default’, we shall:

- ensure any personal information processed is relevant and not excessive, is accurate and up to date and not kept for longer than is necessary;
- we will regularly review and update our procedures to ensure best practice;
- we will provide appropriate training to relevant staff on data protection issues.

Information Audit

DSP currently processes personal data provided by job applicants and employees for core business purposes only. These two groups will be informed how we use their personal data, and advised of their rights, via the use of Privacy Notices.

Our current field of work – the provision of development viability advice to Local Authorities – does not involve the processing of any personal data. Any new lines of work considered in the future will be assessed for data protection implications and proper procedures put in place for the protection of such data.

Personal Data – Job Applicants

The ‘Privacy Notice for Job Applicants’, is appended to this document at Appendix A. The document will also be published with any job adverts on our website (www.dixonsearle.co.uk).

DSP will rely on the consent of the individual as the lawful basis for processing job applicant data. Such consent can be withdrawn at any time upon request, at which point the job application will also be withdrawn.

To enable deletion of data in a timely manner, data will be stored electronically on the company server in one folder for each recruitment round.

Personal Data - Employees

The 'Privacy Notice for Employees' is appended to this document at Appendix B. This Notice will be issued to new employees at the point a job offer is made, and will also be included as an Appendix to the Staff Handbook which is issued to all staff.

DSP will rely on contract and legitimate interests as the lawful bases for processing employee data, as it is necessary to do so in connection with their individual contracts of employment and to comply with our legal obligations as an employer.

To allow easy identification, documents relating to each employee will be stored electronically on a secure area of the company server in one named folder for that individual. In addition, details will be recorded as required by payroll software used by the company or their payroll subcontractor.

Data Controller

DSP's Data Controller is Rob Searle, Company Director. Under GDPR there is no legal requirement to appoint a Data Protection Officer due to the size of the business and the nature of our work.

Access Requests from Individuals

The Data Controller will respond to all reasonable requests from individuals in respect of their personal data as soon as possible and in any case within one month of receipt. We reserve the right to refuse or charge for requests that are manifestly unfounded or excessive, as is our right under the GDPR.

Data Security

DSP will take all reasonable steps to avoid data breaches of electronic files, including, but not restricted to, the following actions:

- use of passwords to restrict server and personal computer access;
- use of up to date antivirus software;
- regular information security reviews with our IT supplier to ensure electronic data is held securely
- regular scheduled backups of data.

As soon as we become aware of any potential data breaches, the Data Controller will advise individuals as soon as possible, and in any case within 72 hours.

Information Commissioner's Office (ICO)

We have consulted information available on the ICO website at March 2018 to inform the detail of this policy. There is no requirement for DSP to register with the ICO as we are only processing personal data for our core business purposes.