

Sample Do Not Use



GDPR Toolkit

TRAINING

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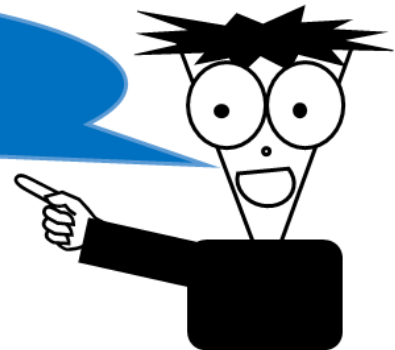
Do not use as-is, but make necessary amendments relevant to your organisation

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INTRODUCTION

Please read the READ ME User Guide first to make sure you know and understand the need to add, amend, or delete in order to reflect your people, processes and technologies as well as the data you hold and the jurisdiction(s) you operate in.

Please browse through this READ ME guide to make sure you understand before starting to use the toolkit



The READ ME User Guide will you help navigate around the GDPR-Toolkit and identify what you need to do for your organisation.

DISCLAIMER

GDPR can be complicated and there are different laws in UK, EU, Jersey and Guernsey. Simply having Templates, Documents, Samples and Guidance does not make you compliant.

The reason for this disclaimer is that I cannot warrant or guarantee materials for every system or circumstance or jurisdiction and the client/user/recipient is obliged to review, test and where necessary customise or take advice to generally assert that they are satisfied before using this “live”.

If DIY isn't for you, that's OK. I'm rubbish at electrical work, plumbing or carpentry. Call an expert. There are many out there and data protection is too important for you, your organisation and the people who trust you with their data for you to get it wrong.

SUPPORT

For those organisations without the resources, skills or experience I can help with training or provide support to customise the documents to meet your particular needs. TimHJRogers@AdaptConsultingCompany.com

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TRAINING POLICY

TITLE	ACC GDPR Training policy.docx	DATE	10/04/18
LOCATION	V:\Data2018\product_gdprtoolkit\ACC GDPR Training policy.docx	VERSION	Ver 1
AUTHOR	[Author]	Pages	3 of 8
APPROVER	[Approver]		

TRAINING POLICY

These procedure base is based on guidance from the UK ICO and related to Data Protection (Jersey) Law 2018

<https://www.jerseylaw.je/laws/enacted/Pages/L-03-2018.aspx>

<https://www.jerseylaw.je/laws/enacted/Pages/L-04-2018.aspx>

The principles of GDPR require that personal information:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s)
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals/Service Users in relation to the processing of personal information, without the knowledge and agreement of the data-subject.

[Organisation Name] will, through appropriate management and strict application of criteria and controls:

1. Observe fully conditions regarding the fair collection and use of information
2. Meet its legal obligations to specify the purposes for which information is used
3. Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
4. Ensure the quality of information used

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In addition, [Organisation Name] will ensure that:

1. It has a Data Protection [Role Title of Data Protection Person] with specific responsibility for ensuring compliance with Data Protection
2. Everyone processing personal information understands that they are contractually responsible for following good data protection practice
3. Everyone processing personal information is appropriately trained to do so
4. Everyone processing personal information is appropriately supervised
5. Anybody wanting to make enquiries about handling personal information knows what to do
6. It deals promptly and courteously with any enquiries about handling personal information
7. It describes clearly how it handles personal information
8. It will regularly review and audit the ways it hold, manage and use personal information
9. It regularly assesses and evaluates its methods and performance in relation to handling personal information
10. All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

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LEVELS OF TRAINING

You may want to consider different training for different people

Training For The Board

This needs to cover the big picture about GDPR and the impact on policies, products and services, as well as the messages to customers. This also has to explain the Board responsibilities and the necessary implementation plan and progress.

Training For The Management

Inevitably it will be the management who need to update the policies, procedures and practices and who will know what data is held where, and for what purpose. Training for the management is largely about implementing GDPR and communicating with staff and customers.

Training For The Staff

Staff at the front-line and good policies and procedures are of little value if staff do not understand and follow them. Training for staff needs to focus on the practical aspects if for example a customer asks a question or staff plan to use, share or disclose data.

Practical What Happens 9 To 5, Monday To Friday

Staff training is vital, but posters are an every-day reminder to clear the desk, lock the cabinets, check the caller. As important as a training session is, it needs reinforcement for knowledge to become habit.

SCOPE OF TRAINING

Training and/or Guidance relevant to the role and responsibilities of all staff, volunteers and those handling personally identifiable information will be given

1. When joining the organisation
2. When taking on a new or changed responsibility towards handling personally identifiable information
3. At least annually as a reminder and part of quality control.

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CONTENT OF TRAINING

It is good to mix theory and practice and have small interactive discussion groups

Data Protection principles as outlined in the Data Protection Policy
Data Protection practices as part of day-to-day operational procedures
Cyber Essentials principles

1. Secure your Internet connection
2. Secure your devices and software
3. Control access to your data and services
4. Protect from viruses and other malware
5. Keep your devices and software up to date

You may also consider testing people on their knowledge and awarding certificates and score sheets to evidence the learning, understanding and agreement.

EXAMPLE OF A ROLL-OUT PLAN

Session 1 Directors (2 hours?)

1. Board responsibilities for GDPR
2. Reporting obligations
3. The need to consider different legislation– GDPR vs UK, Jsy, Gsy and other

Sessions 2,3,4... Management and Staff (max 90mins each, incl Q&A)

Part I will be theoretical using a slide presentation to cover the main areas of GDPR

Theoretical elements

- a. Definition of personal and sensitive data
- b. Core principles of data protection
- c. Rights of data subjects
- d. Definitions and responsibilities of Controllers, Processors and DPO
- e. Breaches and consequences
- f. Subject Access Requests
- g. The importance of DPIAs (Data Protection Impact Assessments)

Part II will be run as a discussion exercise using stories/examples

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DOCUMENT CONTROL

[document owner] is the owner of this document and is responsible for ensuring that this procedure or process is reviewed in line with the review requirements.

Consultation Phase: A document which is circulated for comment to key stakeholders to ensure support for scope, format, and content.

Draft Phase: Ostensibly the last draft, capturing all the points from the previous consultation phase and circulated for comment before being finalised.

Final Phase: A document which is FINAL. This is the baseline document which may subsequently amend over time.

VERSION	DESCRIPTION OF CHANGE	AUTHOR	APPROVAL	DATE OF ISSUE
Consultation	Initial Issue for consultation.	[Author]	[Approver]	March 2018

