

Data Protection Policy

1. Policy Statement:

Parsons + Whittley needs to collect and use certain types of information about employees, clients, contractors and other individuals who come into contact with the practice. This personal information will be dealt with properly however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material.

Parsons + Whittley fully endorse and adhere to the Principles of Data Protection, as detailed in the Data Protection Act, (and are registered with the Information Commissioners Office under registration Z2933619), and regard the lawful and correct treatment of personal information as very important.

2. Our Data Protection Principles:

Specifically, the principles require that personal information:

- will be processed fairly and lawfully
- will be obtained only for one or more specified and lawful purposes, and will not be further processed in any manner incompatible with that purpose or those purposes,
- will be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
- will be accurate and, where necessary, kept up to date,
- will not be kept for longer than is necessary for that purpose or those purposes,
- will be processed in accordance with the rights of data subjects under the Act,
- appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data,
- will 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 data subjects in relation to the processing of personal data

Furthermore Parsons + Whittley will:

- observe fully conditions regarding the fair collection and use of information,
- meet its legal obligations to specify the purposes for which information is used,
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements,
- ensure the quality of information used,
- apply strict checks to determine the length of time information is held,
- ensure that the rights of people about whom information is held, can be fully exercised under the Act. (these include: the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information),
- take appropriate technical and organisational security measures to safeguard personal information,
- ensure that personal information is not transferred abroad without suitable safeguards,

In addition, Parsons + Whittley will ensure that:

- there is someone with specific responsibility for Data Protection.
- everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice,
- everyone managing and handling personal information is appropriately supervised and trained to do so and that they have access to appropriate sources of advice including the Information Commissioner's Office
- methods of handling personal information are clearly described,

- a review and audit is made annually of the way personal information is held, managed and used,
- a breach of the rules and procedures identified in this policy by a member of staff may lead to disciplinary action being taken,
- This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

3. Implementation and review procedures

This policy is constantly available on the company server to allow staff access at all times. It is provided to all employees at appointment, and is publicly available on the company web site. It is further distributed to clients and potential clients on request.

The policy is reviewed at least annually or at any other time according to emerging issues, and re-distributed as above on amendment.

It is the subject of discussion at staff annual review to ensure familiarity and understanding, and also to allow at least an annual opportunity to comment or suggest amendments.

The policy, and its implementation, is the responsibility of

Chris Parsons
Managing Director

and was last reviewed on 18th November 2011