DATA PROTECTION - GDPR

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CONTENTS

1	Scope	2
2	Introduction	2
3	Who does this policy apply to	3
4	Who is responsible for Data protection at NEAS?	3
5	Why is data protection compliance important?	3
6	What is personal data?	3
7	What does processing personal data mean?	4
8	Data protection obligations	4
9	Individual rights and responsibilities	12
10	Record keeping	13
11	Training	14
12	Departures from this policy	14

1. Scope

This policy is designed to recognise and address the North East Autism Society's responsibilities pertaining to the General Data Protection Regulation Act 2018, formerly the Data Protection Act 1998, and to lay out how the Society will handle, process, secure and then destroy personal and sensitive personal data relating to all stakeholders.

In the discharge of its duties and to comply with statutory and moral obligations, the North East Autism Society will collect and retain and share information from many sources including parents,carers, service users, Local Authorities, Health Trusts, the police, suppliers, external contractors and agencies. All of this information will be retained by the North East Autism Society for varying amounts of time in order to comply with the statutory and other rules of retention.

We hold personal data pertaining to children, young people and adults who access our services and their families/carers in order to:

- Support service provision, including caring, teaching and learning
- Monitor and report on progress
- Assess how well the Northeast Autism Society is doing

We hold personal data on people in our employment.

We retain personal data of those people who no longer access our services or are in ouremployment in line with statutory regulation.

2. Introduction

At North East Autism Society, we collect and process information about individuals (i.e. 'personal data') for business purposes, including employment and HR administration, provision of our services, marketing, and business administration. This includes personal data relating to our staff,customers, suppliers and other third parties.

Compliance with data protection law is essential to ensure that personal data remains safe, our business operations are secure, and the rights of individuals are respected. North East Autism Society is a controller under data protection law, meaning it decides how and why it uses personal data. This policy explains our procedures for complying with data protection law in relation to personal data. It also sets out your obligations whenever you are processing any personal data in the course of your employment.

If you routinely handle individuals' personal data, you will be given specific training and instructions regarding data protection procedures in relation to your particular role and department. The training and instructions will supplement your obligations as set out in this policy.

There will also be other policies which will impact on how you deal with personal data and data protection. The main one is our Information Technology policy, and we expect you to comply withthis where relevant.

This Policy does not give contractual rights to any Employees. It may be updated at any time.

3. Who does this policy apply to?

- This policy applies to all North East Autism Society employees, workers, [contractors, agency workers, consultants, interns, volunteers, partners and directors], (together referred to as 'Employees' or 'you').

4. Who is responsible for data protection at Northeast Autism Society?

- The CEO is ultimately responsible for Northeast Autism Society's compliance with applicable data protection law. Northeast Autism Society has appointed a Data Protection Lead who is responsible for overseeing advising North East Autism Society on and administering compliance with this Policy and data protection law.

- All Employees at North East Autism Society have some responsibility for ensuring that personal data is kept secure and processed in a lawful manner although certain employees will have particular responsibilities, of which they will be aware and in respect of which they may receive specific instructions.

- If you are in any doubt about how you should handle personal data, or if you have any concerns orquestions in relation to the operation (or suspected breaches) of this Policy, you should seek advice from the Data Protection Lead, Jessica Greer, COO at jessica.greer@ne-as.org.uk.

5. Why is data protection compliance important?

- Data protection law in the UK is regulated and enforced by the Information Commissioner's Office (ICO). Failure to comply with data protection law may expose North East Autism Society and, in some cases, individual Employees to serious legal liabilities. These can include criminal offences and fines of up to EUR20 million (approximately £18 million) or 4% of total worldwide annual turnover, whichever is higher. In addition, an individual may seek damages from us in the courts if we breach their rights under data protection law. Breaches of data protection law can also leadto serious damage to our brand and reputation.

- In addition to the legal liabilities, failure to comply with your obligations under this policy couldlead to disciplinary action and, in serious cases, it could result in the termination of your employment.

6. What is personal data?

- Personal data means any information relating to any living individual (also known as a 'data subject') who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). Relevant individuals can include your colleagues, consumers, members of the public, business contacts, etc. Personal data can be factual (e.g. contact details or date of birth), an opinion about a person's actions or behaviour, or information that may otherwise impact that individual. It can be personal, or business related.

- Personal data may be automated (e.g. electronic records such as computer files or in emails) orin manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

7. What does 'processing' personal data mean?

- 'Processing' personal data means any activity that involves the use of personal data (e.g. obtaining, recording or holding the data, amending, retrieving, using, disclosing, sharing, erasing or destroying). It also includes sending or transferring personal data to third parties.

8. Data Protection Obligations

- North East Autism Society is responsible for and must be able to demonstrate compliance with data protection law. To ensure that North East Autism Society meets its responsibilities, it is essential that its Employees comply with data protection law and any other North East Autism Society policies, guidelines or instructions relating to personal data when processing personaldata in the course of their employment.

- We have set out below the key obligations under data protection law and details of how North East Autism Society expects employees to comply with these requirements.

a. Process personal data in a fair, lawful and transparent manner

b. Legal grounds for processing

Data protection law allows us to process personal data only where there are fair and legal grounds which justify using the information.

Examples of legal grounds for processing personal data include the following (at least one ofthese must be satisfied for each processing activity):

- complying with a legal obligation (e.g. health and safety or tax laws).
- entering into or performing a contract with the individual (e.g. an Employee's terms andconditions of employment, or a contract for services with an individual customer).
- acting in Northeast Autism Society or a third party's legitimate interests (e.g. maintaining records of business activities, monitoring business productivity); and
- obtaining the consent of the individual (e.g. for sending direct marketing communications).

Where consent is relied upon, it must be freely given, specific, informed and unambiguous, and North East Autism Society must effectively demonstrate that consent has been given.

In line with ICO guidance regarding the employer/Employee relationship, North East Autism Society does not use consent as a legal ground for processing Employee data unless the data processing activities concerned are genuinely optional.

In most cases, consent is also not required for other standard business activities involving the use of customer or supplier data, but it may be needed for activities which are not required to manage the main business relationship, such as direct marketing activities.

Transparency

Data protection law also requires us to process personal data in a transparent manner by providing individuals with appropriate, clear and concise information about how we process their personal data.

We usually provide individuals with basic information about how we use their data on forms which collect data (such as application forms or website forms), and in longer privacy notices settingout details including: the

types of personal data that we hold about them and how we use it.

legal grounds for processing the information, who we might share it with and how long we keep it for. For example, we provide information about our processing of Employees' personal data in the North East Autism Society Employee Privacy Notice.

We supplement these notices, where appropriate, with reminders or additional information at the time particular processing activities take place or become relevant for an individual (for example when they sign up for a new service or event).

What do you need to do:

By processing personal data only in accordance with your lawful job duties and North East Autism Society instructions, ordinarily, you will be processing personal data fairly and lawfully.

The standard privacy notices and statements that we issue, for example, to Employees, customers and the public, should normally be sufficient to ensure that individuals have appropriate information about how you are handling their personal data in the course of your employment. However, you should consider whether reminders or additional information may be appropriate at the time particular processing activities take place. This is particularly importantif you think that individuals may need further assistance to understand clearly how their data will be used as part of such activities.

Any new forms which collect personal data, and any proposed consent wording must be approvedin advance by the Data Protection Lead.

If you have any concerns about the legal grounds for processing personal data or if you are unsure whether individuals have been provided with appropriate information (in particular in relation to any new processing activities), please check with the Data Protection Lead.

c. Take extra care when handling sensitive or special categories of personal data

Some categories of personal data are 'special' because they are particularly sensitive. These include information that reveals details of an individual's:

- racial or ethnic origin;political opinions.
- religious or philosophical beliefs;trade union membership; physical or mental health; sexual life or sexual orientation.
- biometric or genetic data (if used to identify that individual), and criminal offences or convictions.

Where special category personal data is concerned, data protection law requires us to have (as well as one of the legal grounds described in section 1), an additional legal ground to justify usingthis sensitive information. The appropriate legal ground will depend on the circumstances.

Additional legal grounds for processing special category data include the following. Those marked with an asterisk (*) would be particularly relevant to processing Employees' special category personal data:

- complying with a legal obligation/exercising a legal right in the field of employment*; assessing working capacity (based on expert medical opinion, and subject to obligations of confidentiality)
- carrying out equalities monitoring in relation to racial or ethnic origin, religious beliefs,health or sexual orientation*.

- exercising, establishing or defending legal claims*;
- preventing or detecting unlawful acts; or
- explicit consent of the individual. (As well as the requirements for consent outlined in section 1 above, this requires an express statement from the individual that their special category of data may be used for the intended purposes.)

What do you need to do:

If you are handling special category personal data in the course of your employment, you need totake extra care regarding compliance with data protection law. In particular, try to ensure that:

- any processing activities are strictly in accordance with your lawful job duties and Northeast Autism Society instructions;
- there are appropriate legal grounds for processing the data (both basic grounds under section 1 and additional grounds under this section 2) which have been assessed for your specific activities.
- individuals have received adequate information regarding how their data is being handled. Insome cases an existing privacy notice may need to be supplemented with more specific information regarding special category data (e.g. when North East Autism Society ismanaging sickness absence and/or making adjustments to job duties for Employees with disabilities or serious illness, we may provide additional ad hoc privacy notices to supplement the Employee Privacy Notice);
- You apply additional security and confidentiality measures, taking into account that the impact on individuals of loss or misuse of their special category data may be greater than with other types of data. See also section 7 below; and
- If you are relying on consent as a legal ground for processing, you obtain advance approval of any consent wording from the Data Protection Lead.

If you are routinely handling special category data as part of the requirements of your role andjob duties, North East Autism Society will ordinarily have put in place procedures which ensure that your processing activities satisfy the requirements above.

However, if alternative circumstances apply (e.g. you are involved in a new project or updatingan existing system which involves new types of processing of special data category), please contact the Data Protection Lead to ensure that the correct compliance procedures are followed.

Similarly, if you have any concerns over the legal grounds that apply when you are processing special category data or the appropriate information to be provided to individuals, please get in touch with the Data Protection Lead.

d. Only process personal data for specified, explicit and legitimate purposes

North East Autism Society will only process personal data in accordance with our legitimate purposes to carry out our business operations and to administer employment and other business relationships.

What you need to do:

You must only use the personal data that you process in the course of your duties for North East Autism Society's legitimate and authorised purposes. You must not process personal data for any purposes which are unrelated to your job duties.

Processing personal data for any incompatible or unauthorised purposes could result in a breachof data

protection law (e.g. using the company contacts database to find out a colleague's home

address for private, non-work related purposes). This may have potentially damagingconsequences for all parties concerned, including disciplinary action.

If you find that you need to process personal data for a different purpose from that for which it was originally collected, you must check whether the individuals have been informed and, if not, consider whether the additional purpose is legitimate (in the context of North East Autism Society's business activities) and compatible with the original purpose.

If you are unsure about whether the purposes for processing are legitimate, you should contactthe Data Protection Lead before going ahead with processing the data for the additional purpose.

e. Make sure that personal data is adequate, relevant and limited to what is necessary foryour legitimate purposes

Data protection law requires us to ensure that, when we process personal data, it is adequate, relevant to our purposes and limited to what is necessary for those purposes (also known as 'data minimisation'). In other words, we ask for the information we need for our legitimate business purposes, but we won't ask for more information than we need in order to carry out our business operations.

What you need to do:

You should try to ensure that you only acquire and process the personal data that you actually need for Northeast Autism Society's legitimate and authorised purposes within the scope of your role.

You must ensure that you have sufficient personal data needed to be able to use it fairly and to take into account all relevant details.

If you are creating forms that collect personal data, you should be able to justify why each specific category of data is being requested.

You must also comply with North East Autism Society's instructions about data retention and storage, ensuring that personal data is only kept for as long as it is needed for any intended purpose.

f. Keep personal data accurate and (where necessary) up to date

North East Autism Society must take steps to ensure that personal data is accurate and (where necessary) kept up-to-date. For example, we request that Employees provide us with any change in contact details or personal information in writing. We also take care that decisions impacting individuals are based on accurate and up-to-date information.

What do you need to do:

When you process individuals' personal data in the course of your employment, you must make reasonable efforts to be accurate and, where necessary, keep the relevant information updated.

When collecting any personal data, try to confirm its accuracy at the outset. If you subsequently discover any inaccuracies in the personal data that you are handling, these need to be corrected or deleted without delay.

Personal data should be held in as few places as possible to avoid the risk that duplicated copiesare not updated and become out of sync. You should not create additional copies of personal

data, but should work from and update a single central copy where possible (in accordance with standard North East Autism Society procedures on retention and storage of records).

g. Keep personal data for no longer than is necessary for the identified purposes

Records containing personal data should only be kept for as long as they are needed for the identified purposes. North East Autism Society has in place data retention, storage and deletion policies and internal processes/guidelines regarding various types of company records and information that contain personal data.

We take appropriate steps to retain personal data only for so long as is necessary, taking intoaccount the following criteria:

- the amount, nature, and sensitivity of the personal data;the risk of
- harm from unauthorized use or disclosure.
- the purposes for which we process the personal data and how long we need the particulardata to achieve these purposes.
- how long the personal data is likely to remain accurate and up-to-date.
- for how long the personal data might be relevant to possible future legal claims; and
- any applicable legal, accounting, reporting or regulatory requirements that specify howlong certain records must be kept.

What do you need to do:

Please familiarise yourself with our retention policies, processes, guidelines and instructions that are relevant to your job. Ensure that, where it falls within your responsibility, you destroy or erase all information that you no longer require in accordance with these.

If you are not sure what retention guidelines/instructions apply to you in your role, or you are unsure of how to apply them to a particular type or item of personal data, please contact theData Protection Lead.

h. Take appropriate steps to keep personal data secure

Keeping personal data safe and complying with Northeast Autism Society's security procedures toprotect the confidentiality, integrity, availability and resilience of personal data is a key responsibility for North East Autism Society and its workforce.

North East Autism Society has an Information Technology Policy, which sets out its organisational and technical security measures to protect information, including personal data

It also contains the protocols for Employees on use of technology and communications systems, which also help to ensure appropriate security of personal data stored or communicated usingsuch systems.

We regularly evaluate and test the effectiveness of these measures to ensure the security of ourpersonal data processing activities [as set out in our Information Technology Policy].

What you need to do:

To assist North East Autism Society in maintaining data security and protecting the confidentialityand integrity of the personal data you handle in course of your employment, we require you to comply with this policy, our Information Technology Policy and any North East Autism Society instructions regarding the processing and security of personal data. In particular, we require you to:

- *save, store and communicate personal data only within or using authorized North East Autism Society information and communications systems. Restrict storage of personal data on personal devices or using personal communications facilities*
- *use password-protected and encrypted software for the transmission and receipt of emailslock files in a*
- *secure cabinet*
- *never leave your laptop, other device or any hard copies of documents containing personal data in a public place*
- *take care when observing personal data in hard copy or on-screen that such information is not viewed by anyone who does not have the right to that information, especially if you are viewing the personal data in a public place*
- *when storing data on portable devices such as laptops, smartphones, or USB drives, ensure that the device is encrypted and password protected*
- *ensure that information containing personal data is disposed of securely and permanently, using confidential waste disposal or shredding where necessary*
- *alert the Data Protection Lead to any personal data breaches immediately (see below for further details about personal data breaches)*
- *ensure that any sharing or disclosure of personal data is permitted on appropriate legal grounds and, where necessary, safeguards are in place (see below for further details of safeguards regarding overseas transfers or if sharing personal data with third party service providers)*]

i. Take extra care when sharing or disclosing personal data

The sharing or disclosure of personal data is a type of processing, and therefore all the principles described in this Policy need to be applied.

Internal data sharing

North East Autism Society ensures that personal data is only shared internally on a 'need to know' basis.

External data sharing

We will only share personal data with other third parties (including group entities) where we havea legitimate purpose, and an appropriate legal ground under data protection law which permits usto do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to HMRC for tax purposes) or where necessary to perform our contractual duties to individuals (e.g. provision of information to our occupational pension providers).

We may appoint third party service providers (known as processors) who will handle information on our behalf, for example to provide payroll, data storage or other technology services.

North East Autism Society remains responsible for ensuring that its processors comply with data protection law and this Policy in their handling of personal data. We must assess and apply data protection and information security measures prior to and during the appointment of a processor. The extent of these measures will vary depending on the nature of the activities, but will include appropriate risk assessments and reviews, and contractual obligations.

Details of the recipients or categories of recipients of personal data (including processors andother third parties) should be set out in privacy notices as described in section 1 above.

What you need to do:

You may only share or disclose the personal data we hold internally with an Employee, agent or representative of North East Autism Society if the recipient has a job-related need to know the information.

You may only disclose the personal data we hold to service providers or other third parties (including group entities) where:

- there is a legitimate purpose and an appropriate legal ground for doing so (e.g. it is necessary for them to process the personal data in order to provide a service to us such as payroll, or if we are legally obliged to do so);
- the individuals whose personal data is being shared have been properly informed (e.g. in an appropriate privacy notice);
- if the disclosure is to a service provider, North East Autism Society has checked that adequate security and data protection measures are in place to protect the personal data concerned;
- the service provider or third party has signed up to a written contract that contains the provisions required by data protection law (unless the Data Protection Lead has determined that this is not required in context); and
- the transfer complies with any overseas transfer restrictions, if applicable.

Routine disclosures of personal data to established recipients (e.g. payroll providers or group entities) which form a normal and regular part of your role and job duties will ordinarily satisfy the above requirements. You should always ensure you comply with any particular North East Autism instructions you are given. However, if you are in any doubt as to whether you can share personal data with anyone else, first contact the Data Protection Lead.

j. Do not transfer personal data to another country unless there are appropriate safeguardsin place

An overseas transfer of personal data takes place when the data is transmitted or sent to,viewed, accessed or otherwise processed in, a different country. European Union data protection law restricts, in particular, personal data transfers to countries outside of the European Economic Area (EEA – this is the European Union plus Norway, Liechtenstein and Iceland), to ensure that thelevel of data protection afforded to individuals is not compromised (as the laws of such countries may not provide the same level of protection for personal data as within the EEA).

To ensure that data protection is not compromised when personal data is transferred to another country, North East Autism Society assesses the risks of any transfer of personal data outside of the UK (taking into account the principles in this Policy, as well as the restrictions on transfers outside the EEA) and puts in place additional appropriate safeguards where required.

We do not currently transfer personal data outside the UK.

What you need to do:

If you are required to transfer individuals' personal data outside of the UK or EEA in the course of your employment, adequate safeguards will need to be in place. Where these overseas transfers are a normal part of your role and job duties, North East Autism Society's current safeguards are likely to provide the required levels of data protection.

However, if you are transferring personal data overseas in alternative circumstances (e.g. for newtypes of processing activities which haven't previously formed part of your job scope and activities, or to countries with which you haven't previously dealt) you should contact the Data Protection Lead for further guidance before

going ahead with the transfer.

k. Report any data protection breaches without delay

North East Autism Society takes any data protection breaches very seriously. These can include lost or mislaid equipment or data, use of inaccurate or excessive data, failure to address an individual's rights, accidental sending of data to the wrong person, unauthorised access to, use of or disclosure of data, deliberate attacks on North East Autism Society's systems or theft of records, and any equivalent breaches by North East Autism Society's service providers.

Where there has been a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to individuals' personal data, North East Autism Society will take immediate steps to identify, assess and address it, including containing the risks, remedying the breach, and notifying appropriate parties (see below).

If North East Autism Society discovers that there has been a personal data security breach that poses a risk to the rights and freedoms of individuals, we will report it to the ICO within 72 hours of discovery.

We also keep an internal record of all personal data breaches regardless of their effect and whether or not we report them to the ICO.

If a personal data breach is likely to result in a high risk to the rights and freedoms of individuals, we will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures we have taken.

What you need to do:

If you become aware of any breach (or suspected breach) of this Policy (including, in particular any security breach), you must report it to the Data Protection Lead immediately via jessica.greer@ne-as.org.uk and take any other required steps in to ensure that the breach is effectively assessed and addressed, and that we comply with North East Autism Society's data breach reporting obligations.

l. Do not use profiling or automated decision-making unless you are authorised to do so

Profiling, or automated decision-making, occurs where an individual's personal data is processed and evaluated by automated means resulting in an important decision being taken in relation to that individual. This poses particular risks for individuals where a decision is based solely on that profiling or other automated processing.

One example of solely automated decision-making would be using an online psychometric test to automatically reject job applicants who do not meet a minimum pass mark (without any human oversight such as a review of the test results by a recruiting manager).

Data protection law prohibits decision-making based solely on profiling or other automatedprocessing, except in very limited circumstances. In addition, where profiling or other automated decision-making *is* permitted, safeguards must be put in place and we must give individuals the opportunity to express their point of view and challenge the decision. We do not generally conduct profiling or other automated decision-making in respect of Employees' or service user's personal data.

What you need to do:

If you conduct profiling or other automated decision-making in the course of your role, you must familiarise yourself with and implement any applicable safeguards.

If you are proposing to undertake any new automated decision-making or profiling activities in thecourse of your employment, please contact the Data Protection Lead, who will advise you whether it is permitted and about the safeguards you need to put in place.

m. Integrate data protection into operations

Data protection law requires North East Autism Society's to build data protection considerations and security measures into all of our operations that involve the processing of personal data, particularly at the start of a new project or activity which may impact on the privacy of individuals. This involves taking into account various factors including:

- the risks (and their likelihood and severity) posed by the processing for the rights andfreedoms of individuals;
- technological capabilities;
- the cost of implementation; and
- the nature, scope, context and purposes of the processing of personal data.

We also seek to assess data protection risks regularly throughout the lifecycle of any project or activity which involves the use of personal data.

What you need to do:

If you are involved in the design or implementation of a new project or activity that involves processing personal data, you must give due consideration to all the principles of data protection set out in this policy.

You should assist the Data Protection Lead with regular reviews of projects or activities to ensure data protection risks continue to be addressed.

A useful tool for assessing data protection and privacy considerations is a Data Protection Impact Assessment or 'DPIA'. A DPIA will consider the necessity and proportionality of a processing operation, and assess the risks to individuals and the measures that can be put in place to mitigate those risks. A DPIA must be carried out if a data processing operation is likely to give riseto a high risk to individual rights and freedoms.

If you are involved in the design or implementation of a new project that involves processing personal data, you must check whether it is necessary to conduct a DPIA or similar risk or compliance assessment by contacting the Data Protection Lead. They will also be able to advise you on how we expect you to conduct, or otherwise contribute to, a DPIA or similar riskassessment.

9. Individual Rights and Requests

Under data protection law, individuals have certain rights when it comes to how we handle their personal data. For example, an individual has the following rights:

- **The right to make a 'subject access request'.** This entitles an individual to receive a copy of the personal data we hold about them, together with information about how and why we process it and other rights which

they have (as outlined below). This enables them, for example, to check we are lawfully processing their data and to correct any inaccuracies.

- The right to request that we correct incomplete or inaccurate personal data that we hold about them.
- The right to withdraw any consent which they have given.
- The right to request that we delete or remove personal data that we hold about them where there is no good reason for us continuing to process it. Individuals also have the right toask us to delete or remove their personal data where they have exercised their right to objectto processing (see below).
- The right to object to our processing of their personal data for direct marketing purposes, or where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- The right to request that we restrict our processing of their personal data. This enables individuals to ask us to suspend the processing of personal data about them, for example if they want us to establish its accuracy or the reason for processing it.
- The right to request that we transfer to them or another party, in a structured format, their personal data which they have provided to us (also known as the right to 'data portability'). The applicability of this right depends on the legal grounds on which we process it.
- The right to challenge a decision based solely on profiling/automated processing, to obtain human intervention, and to express their point of view.

We are required to comply with these rights without undue delay and, in respect of certain rights,within a one month timeframe.

Individuals also have rights to complain to the ICO about, and to take action in court to enforce their rights and seek compensation for damage suffered from, any breaches.

What you need to do:

If you receive a request from an individual seeking to exercise a right in relation to their personal data, or making an enquiry or complaint about our use of their personal data, you must forward the request, enquiry or complaint to the Data Protection Lead immediately so that it can be dealtwith appropriately and within the applicable time limit [in accordance with North East Autism Society's individual personal data rights procedures]. Your assistance may be needed to address and respond to the request, enquiry or complaint.

10. Record Keeping

In order to comply, and demonstrate our compliance, with data protection law, North East AutismSociety keeps various records of our data processing activities. These include a Record of Processing which must contain, as a minimum: the purposes of processing; categories of data subjects and personal data; categories of recipients of disclosures of data; information about international data transfers; envisaged retention periods; general descriptions of security measures applied; and certain additional details for special category data.

What you need to do:

You must also comply with our applicable processes/guidelines and any specific instructions you are given concerning the keeping of records about our processing of personal data.

If you are processing individuals' personal data in the course of your employment and you collect any new types of personal data or undertake any new types of processing activities, either through the introduction of new systems or technology or by amending existing ones, please inform the Data Protection Lead so that we are able to keep our records up-to-date.

11. Training

We require all Employees to undergo some basic training to enable them to comply with data protection law and this policy. Additional training may be required for specific roles and activitiesinvolving the use of personal data.

To this end, we provide training as part of our induction process for new joiners to North East Autism Society and operate an ongoing training programme to make sure that Employees' knowledge and understanding of what is necessary for compliance in the context of their role is up-to-date. Attendance at such training is mandatory and will be recorded.

12. Departures from this Policy

There are some very limited exemptions from data protection law, which may permit departure from aspects of this Policy in certain circumstances.

You will be given specific instructions if any exemptions are relevant to your role.

If you think you should be able to depart from this Policy in any circumstances, you must contact the Data Protection Lead before taking any action.