

GDPR TRAINING POLICY (TIER 1)

Document Control

Reference: GDPR DOC 1.1

Issue No: 1.1

Issue Date: 25/05/2018

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1. Scope

This policy applies to Cognus's training and awareness programme where relevant to the GDPR, compliance with the GDPR, and other matters relating to data protection and privacy.

2. Training policy

- 2.1 Head of Resources assigns data protection responsibilities to Employees/Staff in relation to Cognus's policies and procedures on personal data management.
- 2.2 Head of Resources shall ensure that all Employees/Staff with day-to-day responsibilities involving personal data and processing operations, and those with permanent/regular access to personal data, demonstrate compliance with the GDPR.
- 2.3 These members of Employees/Staff are able to demonstrate competence in their understanding of the GDPR how this is practised and implemented throughout Cognus.
- 2.4 Head of Resources ensures that these members of Employees/Staff are kept up to date and informed of any issues related to personal data.
- 2.5 Head of Resources maintains a list of relevant external bodies, the most important of which is the Information Commissioner's Office (ico.org.uk).
- 2.6 Board of Directors promote training and awareness programmes, and Cognus shall make resources available in order to raise awareness. The Head of Resources shall demonstrate and communicate to Employees/Staff the importance of data protection in their role and ensure that they understand how and why personal data is processed in accordance with Cognus's policies and procedures.
- 2.7 Head of Resources ensures that all security requirements related to data protection are demonstrated and communicated to Employees/Staff to the same affect.
- 2.8 Employees/Staff are provided with specific training on processing personal data relevant to their individual day-to-day roles and responsibilities, and in accordance with Cognus's policies and procedures.
- 2.9 Employees/Staff are provided with specific training on any information security requirements and procedures applicable to data protection and the data processing within their individual day-to-day roles and responsibilities, including reporting personal data breaches.
- 2.10 Employees/Staff are provided with training on dealing with complaints relating to data protection and processing personal data.
- 2.11 HR Department and Head of Resources retain records of the relevant training undertaken by each person who has this level of responsibility.
- 2.12 All Employees/Staff with day-to-day responsibilities involving personal data and processing operations will at planned intervals assess the PIMS and it's capability to demonstrate compliance to the GDPR.
- 2.13 The Head of Resources and HR Department are responsible for organising relevant training for all responsible individuals and Employees/Staff generally, and for

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maintaining records of the attendance of staff at relevant training at appropriate times across Cognus's business cycle.

Document Owner and Approval

The Head of People is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the Intranet.

This policy was approved by the Board of Directors on 22nd May 2018 and is issued on a version controlled basis under the signature of the Managing Director.

Signature:



Date: 25/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1.1	Initial issue	Board of Directors	25/05/2018