

COMMUNICATIONS PROCEDURE (TIER 2)

Document Control

Reference: GDPR DOC 7.4

Issue No: 1

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1. Scope

All internal and external communications related to personal data, data breaches, GDPR compliance or any other topic related to data protection by Cognus Limited are within the scope of this procedure.

Where relevant, Cognus's policies, procedures and work instructions may determine the requirements for specific internal or external communications.

Where this is the case, those documents supersede the procedure below.

2. Responsibilities

- 2.1 The Head of Resources is responsible for identifying any necessary internal/external communications relating to GDPR compliance.
- 2.2 The Head of Resources and Managing Director are responsible for identifying when internal or external communication will be necessary.
- 2.3 The Head of People and Head of Resources is responsible for identifying requirements for internal and external communications and scheduling any necessary regular internal communications relevant to the GDPR.
- 2.4 The Managing Director and Services Director are responsible for approving external communications.

3. Internal communications

- 3.1 The Head of People and Head of Resources identifies the necessity for internal communication based on any changes, awareness needs, or improvements required with regard to personal data, data breaches, GDPR compliance or any other topic related to data protection.
- 3.2 The Head of People and Head of Resources identifies the content of the communication according to the following conditions:
 - 3.2.1 Cause for the communication
 - 3.2.2 Classification of the information being communicated
 - 3.2.3 Classification of the communication itself
- 3.3 The Head of People and Head of Resources identifies the appropriate audience for the communication according to the following conditions:
 - 3.3.1 Classification of the information being communicated
 - 3.3.2 Need-to-know
 - 3.3.3 The medium of communication (e.g. email, staff room notice, mandatory signed notification, etc.)
- 3.4 The Head of People and Head of Resources composes the communication as appropriate.

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- 3.5 The communication, if internal, is subject to review and approval by the Head of People and Head of Resources jointly.

4. External communications

- 4.1 Cognus is party to the following information sharing networks:
- 4.1.1 Social media sites such as twitter and facebook and the company websites
- 3.6 The Head of Resources identifies the necessity for external communication based on any changes, awareness needs, or improvements required with regard to personal data, data breaches, GDPR compliance or any other topic related to data protection.
- 3.7 The Head of Resources makes available the contact details their contact details as the Data Protection senior management representative relevant data processors, data controllers (if separate organisations), as well as to data subjects and the Information Commissioners Office.
- 4.2 The Head of Resources identifies the content of the communication according to the following conditions:
- 4.2.1 Cause for the communication
 - 4.2.2 Classification of the information being communicated
 - 4.2.3 Classification of related information
- 4.3 The Head of Resources identifies the appropriate audience for the communication according to the following conditions:
- 4.3.1 Cause for the communication
 - 4.3.2 Classification of the information being communicated
 - 4.3.3 Contractual, statutory or regulatory obligations
 - 4.3.4 The medium of communication (e.g. email, staff room notice, mandatory signed notification, etc.)
- 4.4 The Head of Resources composes the communication as appropriate, in accordance with Cognus's style guide for external communications.
- 4.5 The communication is subject to review and approval by the Managing Director or in her absence the Services Director.

Document Owner and Approval

The Head of Resources is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

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

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This procedure was approved by the Board of Directors on 22nd May 2018 and is issued on a version controlled basis under his/her signature.



Signature:

Date: 22/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Board of Directors	22/05/2018