



Data Protection Policy

1) Purpose and scope

- a) The purpose of this policy is to ensure compliance with the General Data Protection Regulation and related EU and national legislation ('data protection law'). Data protection law applies to the storing or handling ('processing') of information ('personal data') about living identifiable individuals ('data subjects').
- b) This policy applies to the Academy of Forensic Medical Sciences ('the Academy' or 'AFMS'), as a single organisation ('data controller').
- c) This policy applies to all staff except when acting in a private or non-Academy capacity. In this policy, the term 'staff' means anyone working in any context within the Academy at whatever level or grade and whether permanent, fixed term or temporary, including but not limited to employees, retired but active research staff, other visiting research or teaching staff, workers, trainees, interns, seconded staff, agency staff, agents, volunteers, and external members of committees.
- d) This policy applies to all students when processing personal data on behalf of the Academy, but not in any other situation including when acting in a private or non-Academy capacity.
- e) This policy is not, and should not be confused with, a privacy notice (a statement informing data subjects how their personal data is used by the Academy).
- f) This policy should be read in conjunction with the obligations in the following documents, which supplement this policy where applicable:
 - i) staff employment contracts and comparable documents (e.g. worker agreements), which impose confidentiality obligations in respect of information held by the Academy;

- ii) information security policies, procedures and terms and conditions, which concern the confidentiality, integrity and availability of Academy's information, and which include rules about acceptable use, breach reporting, IT monitoring, and the use of personal mobile devices;
- iii) records management policies and guidance, which govern the appropriate retention and destruction of Academy's information; and
- iv) any other contractual obligations on the AFMS or individual staff which impose confidentiality or data management obligations in respect of information held by the Academy, which may at times exceed the obligations of this and/or other policies in specific ways (e.g. in relation to storage or security requirements for funded research).

2) Policy statement

- a) The Academy is committed to complying with data protection law as part of everyday working practices.
- b) Complying with data protection law may be summarised as but is not limited to:
 - i) understanding, and applying as necessary, the data protection principles when processing personal data;
 - ii) understanding, and fulfilling as necessary, the rights given to data subjects under data protection law; and
 - iii) understanding, and implementing as necessary, the Academy's accountability obligations under data protection law.

3) Roles and responsibilities

- a) The Academy has a corporate responsibility as a data controller (or when acting as a joint data controller or a data processor) for:
 - i) complying with data protection law and holding records demonstrating this;
 - ii) cooperating with the Information Commissioner's Office (ICO) as the UK regulator of data protection law; and
 - iii) responding to regulatory/court action iii) and paying administrative levies and fines issued by the ICO.
- b) The Academy's Board of Directors is responsible for:
 - i) reviewing (at least once every five years) and approving this policy; and

- ii) assessing the overall risk profile and ensuring appropriate resources and processes are in place and implemented to enable compliance with data protection law.
- c) The Academy Office, is responsible for:
 - i) publishing and maintaining core privacy notices and other AFMS-wide data protection documents;
 - ii) handling data subject rights requests; and
 - iii) managing and/or handling Data Protection Impact Assessments, data subject complaints and personal data breaches.
- d) Individual staff, as appropriate for their role and in order to enable the Academy to comply with data protection law, are responsible for:
 - i) following relevant advice, guidance and tools/methods provided by the Academy Office
 - ii) when processing personal data on behalf of the Academy, only using it as necessary for their contractual duties and/or other Academy roles and not disclosing it unnecessarily or inappropriately;
 - iii) recognising, reporting internally, and cooperating with any remedial work arising from personal data breaches;
 - iv) recognising, reporting internally, and cooperating with the fulfilment of data subject rights requests;
- e) Non-observance of the responsibilities in paragraph d) may result in disciplinary action.
- f) The roles and responsibilities in paragraphs a) to f) do not waive any personal liability for individual criminal offences for the wilful misuse of personal data under data protection law.

4) Contact and date of last revision

- a) The Academy Office can be contacted on: info@afms.org.uk
- b) This policy was last revised and approved by the Academy's Board of Directors in May 2018.