Upper Medway Internal Drainage Board
Data Protection Training Policy

1. Upper Medway Internal Drainage Board (the Board) will maintain a proportionate, role-based data protection training programme to support compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. This policy applies to staff, Board members, temporary and agency workers, volunteers and contractors who handle personal information for the Board. Those with particular data protection responsibilities must have and maintain the competence required for their roles.

2. The Clerk will maintain an up-to-date training register covering everyone within this policy's scope. Records will include training dates, content, completion, checks of understanding, further training needs and refresher due dates. Training records must be protected, accessible only to authorised persons and retained in accordance with the Board's retention arrangements.

3. The Clerk will keep training content and relevant personnel informed of changes in legislation, regulatory guidance and the Board's procedures, using Information Commissioner's Office guidance and relevant sector advice. The Board's Data Protection Officer (DPO) will advise on training needs and content and independently monitor compliance, including awareness-raising and training. The Board remains accountable for compliance and will provide appropriate resources and continuing development for the DPO and others with specialist responsibilities.

4. Training must enable individuals to apply the data protection principles, recognise lawful processing and the need for additional safeguards for special category and criminal offence data, maintain confidentiality, share information securely and follow retention and disposal procedures. It must cover recognising and promptly referring individuals' rights requests and data protection complaints, and immediately reporting suspected personal data breaches to the Clerk and DPO under the Board's procedures. Complaints-handling training must reflect the statutory requirement to acknowledge data protection complaints within 30 days and to investigate, keep the complainant informed and communicate the outcome without undue delay. Those handling requests, complaints or breaches must receive additional training on applicable deadlines and procedures.

5. Everyone within this policy's scope must complete appropriate induction training before being permitted to process personal information for the Board. Refresher training must be completed at least annually as a Board policy requirement, with additional training when roles, systems, risks, legislation or procedures change, or incidents identify a need. Content must reflect each role and the Board's activities, including ratepayer and landowner records, drainage works correspondence, staff information and Board papers where these contain personal data. Training must address safe handling in the office, in the field and when working remotely, including approved devices, email and AI tools. Accessible alternatives must be provided where required, including for personnel who do not routinely use computers.

6. The Clerk will organise training, assess role-specific needs with advice from the DPO, and monitor completion and effectiveness through proportionate knowledge checks or practical exercises. Non-completion or gaps in understanding must be followed up promptly with support and further training; access to personal information must be restricted where necessary until competence is demonstrated. The Clerk will report completion levels, overdue training and significant gaps to the Board at least annually. The Board will review this policy and the training programme annually and sooner following relevant legal changes, significant incidents or changes in processing.

June 2024 Amendments

- None

November 2026 Amendments

- Updated the legal framework to UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, including training on the new data protection complaints requirements.
- Extended role-based training to Board members and other personnel handling personal data, with content tailored to the Board's activities.
- Required induction before processing personal data, annual refresher training as Board policy, and additional training when risks or requirements change.
- Clarified DPO oversight, Board accountability and training on rights requests, secure handling and immediate breach reporting.
- Strengthened training records, checks of understanding, follow-up of gaps, annual reporting and policy review.