

## 1.0 PURPOSE

To ensure that employment records (paper based and computerised) are collected and maintained in accordance with the requirements of the Data Protection Act 1998.

## 2.0 RESPONSIBILITIES

The Data Protection Controller is responsible for ensuring that the Company's employment practices and procedures comply with the aforementioned and as such assume overall responsibility for the maintenance of all employment records in accordance with the Data Management and Security Matrix.

## 3.0 DOCUMENTATION

- 3.0.1 CAP 06/F1 – Data Management and Security Matrix

## 4.0 GENERAL

- 4.0.1 The Company will ensure that all newly appointed workers are aware of the nature and source of any information kept about them, how this will be used and to whom it will be disclosed, this will be indicated to all new employees within their Contracts.
- 4.0.2 This procedure will provide information for all workers in respect of their rights under the Data Protection Act 1998, including their right to access information kept about them.

## 5.0 RIGHT TO ACCESS

The Data Protection Act 1998 provides employees with a right to access personal information held about them by the Company and to ascertain the purpose for which it is processed. This right is known as a subject access right.

- 5.0.1 Employees wishing to make a subject access right should, in the first instance, apply in writing to an Executive Director or the Human Resources department.
- 5.0.2 The Company will respond within 40 calendar days of receiving the subject access request by providing the employee with a hard copy of the information kept. The information will be sent to the individual's home address unless agreed otherwise.
- 5.0.3 The company reserves the right to charge a fee of £20.00 - £25.00 dependent on the amount of work involved for providing such information, plus copy charges per copy.
- 5.0.4 The Company reserves the right to only supply dates of employment and trade/position as a reference response. No other information will be supplied.

## 6.0 PROCEDURE

- 6.0.1 All employees will have either a paper-based or computerised record throughout their employment and for as long a period as necessary following the termination of employment. The type of information the company will need to keep will be for purposes connected with individual's employment including, but not limited to, the following:

- Recruitment and selection;
- Competence assurance and skills monitoring;
- Reporting, including local, regional and company and statutory reporting;
- Maintaining contact details for you and your dependants in case of emergency;
- Safety, health checks and any other statutory requirements
- Crime prevention; and monitoring electronic communications
- Appraisal / performance assessments

In addition, the records may include: information gathered from the employees and any references obtained during recruitment; details of your terms of employment; payroll, tax, national insurance information; performance data; health records; absence records including holiday records and self-certification forms; details of any disciplinary investigations and proceedings; training records; correspondence with the company and any other information given the individual to the company.

The Company believes that these uses are consistent with the employment relationship and with the principles of the Data Protection Act 1998. The information will be held for management and administrative use only but it may be necessary from time to time, to disclose some information held about you to relevant third parties (e.g. when legally obliged to do so by instructions from the H M Inland Revenue or where requested to do so by the individual for the purpose of giving a reference).

- 6.0.2 Human Resources or Payroll will have responsibility for detailing the aforementioned types of information on the Company's computerised personnel system. At the same time a paper-based file will be opened and will mirror the contents of the computer system at all times.