POLICY DOCUMENT

Data Protection Policy

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DATA PROTECTION POLICY and PROCEDURE

The Policy

Royal Blind recognises the importance of safeguarding personal privacy when dealing with information about employees. The policy complies with the Data Protection Act 1998 (the Act) and requires us to inform employees what data we hold on them and the purposes for which this data might be used.

Summary of Principles

The organisation’s handling of your personal data must comply with certain principles of good practice which underpin the Act which state that personal data shall:

- Be obtained and processed fairly and lawfully
- Be held only for specified and lawful purposes
- Be adequate, relevant but not excessive
- Be accurate and where necessary, kept up to date.
- Be held for no longer than necessary
- Be accessible to you, as and when requested.
- Be protected by appropriate measures against unauthorised or unlawful processing and against accidental loss, damage or destruction; and
- Not be transferred outside the European Economic Area without your consent unless that country or the recipient is deemed to be ensuring an adequate level of protection.

Royal Blind and all staff who process, or use personal data must ensure that they abide by these principles at all times. This policy has been developed to ensure this happens.

The Policy in Operation

We collect, maintain and process data about employees to enable us to conduct our business and to ensure that company policies such as the Communications policy are being followed. We also process data to enable us to comply with legal, fiscal and other regulatory requirements.

Where we operate CCTV cameras, we do so at the request of our customers for the purposes of security and crime prevention purposes and do not seek to obtain nor do we intentionally retain CCTV images of staff.

For the purposes of security, a key fob system is in use throughout the majority of the organisation. This will not be used for purposes of timekeeping nor to determine where people are on a regular basis. This information will be used for security and crime
prevention purposes and we do not seek to obtain nor do we intentionally hold this information of staff. Within reasonable and practical limits, an employee’s key fob should not be used by anyone other than the assigned user at any time. Deliberate misuse of another employee’s key fob may lead to disciplinary action.

**Information we hold**

The types of data that we may hold will vary as according to needs of the organisation. Certain information about you is regarded as “sensitive personal data” under the Act and is specially protected. It can only be processed under certain conditions. A summary of the types of information we hold as follows including a list of what is constituted as sensitive personal data can be found in the appendix, pg. 8.

**Personal data**

Royal Blind may supply personal data to the following;

- Individuals who are legally entitled to the information or to lenders, banks, landlords, future employers or other persons or organisations seeking specific information, which you have agreed we may give them.
- Organisations that provide the company with electronic data processing services or other professional or management services such as financial, legal, or health organisations.
- Business partners or other third parties who become involved in the management of our business for instance because of a joint venture, merger or outsourcing.
- Any authority which we are required by law to disclose personal data to (e.g. Her Majesty’s Revenue and Customs, the Health and Safety Executive, the Police etc).

**Conditions**

We will ensure that at least one of the following conditions is met before we process any personal data:

1. the individual has consented to the processing
2. the processing is necessary for the performance of a contract with the individual
3. the processing is required under a legal obligation (other than one imposed by a contract)
4. the processing is necessary to protect vital interests of the individual
5. the processing is necessary to carry out public functions e.g. administration of justice
6. the processing is necessary in order to pursue our legitimate interests or those of third parties (unless it could unjustifiably prejudice the interests of the individual)

Under the Act, one of a set of additional conditions must be met for ‘sensitive personal data’. This includes information about racial or ethnic origin, political opinions, religious and other beliefs, trade union membership, physical or mental health condition, criminal proceedings or convictions. We will ensure that one of the following additional conditions is met before we process any sensitive personal data:
1. the individual has explicitly consented to the processing
2. we are required by law to process the information for employment purposes
3. we need to process the information in order to protect the vital interests of the individual or another person
4. the processing is necessary to deal with the administration of justice or legal proceedings

We will ensure that adequate security measures are taken so that privacy is preserved whenever processing of sensitive personal data takes place

**Access to personal data**

All employees are entitled to reasonable access to their own personal data to verify it and put right any inaccuracies. Employees wishing to access their personal data should submit a written application to the HR Manager, indicating the information that access is sought to. Wherever possible we aim to process this information within 1 working week of the request being made.

**Misuse of personal data**

It is a criminal offence to knowingly or recklessly, without the consent of the organisation to:

- **disclose personal data about employees, residents, young people or customers to third parties**; (e.g. employees passing information to journalists).
- **obtain personal data**; (e.g. journalists obtaining personal information from employees).
- **procure the disclosure of personal information to another person**
  (e.g. a private detective paying an employee to disclose information to a journalist).

Any wilful and deliberate misuse of personal data by employees will be treated extremely seriously and may constitute a disciplinary offence under Royal Blind’s disciplinary procedure. Any employee who has a concern about a request should contact their line manager in the first instance.

**Additional Information**

This document will be reviewed regularly and updated as necessary. However, it will only be re-issued to all Staff when there is a significant change to the Policy or Procedures. An up to date version of the document can be obtained from your line manager, HR Department or accessed on the Intranet.
APPENDIX

This appendix is an outline of the types of information we may hold and the purposes for which we may do so. It covers all types of data subjects and is a broad description of the data categories held. It is not intended to be an exhaustive list of reasons as to why the data is held.

We hold information for 10 purposes as outlined;

1. Staff Administration purposes

Purpose Description: Appointments or removals, pay, discipline, superannuation, work management or other personnel matters in relation to the staff of the data controller.

Data subjects are: Staff including volunteers, agents, temporary and casual workers, complainants, correspondents and enquirers, relatives, guardians and associates of the data subject

Includes: personal details, education and training details, employment details, freely given financial details as required, racial or ethnic origin*, trade union membership*, physical or mental health conditions, disciplinary records, offences (including alleged offences).

*It is the right of employees not to disclose this information

2. Administration of membership records

Purpose Description: The administration of membership records.

Data subjects are: Staff including volunteers, agents, temporary and casual workers, Members or supporters, Complainants, correspondents and enquirers, donors and lenders

Includes: personal details, family, extenuating and social circumstances, freely given financial details as required, goods or services provided, membership details.

3. Fundraising

Purpose Description: Fundraising in support of the objectives of the Organisation.

Data subjects are: Staff including volunteers, agents, temporary and casual workers, Members or supporters, Complainants, correspondents and enquirers, Advisers, consultants and other professional experts, Business or other contacts, Employees of other organisations, Donors and lenders

Includes: personal details, family, extenuating and social circumstances, freely given financial details as required, goods or services provided, membership details.

4. Realising the objectives of a charitable organisation or voluntary body
**Purpose Description:** The provision of goods and services in order to realise the objectives of the charity or voluntary body.

**Data subjects are:** Staff including volunteers, agents, temporary and casual workers, customers and clients, suppliers, members or supporters, complainants, correspondents and enquirers, relatives, guardians and associates of the data subject, advisers, consultants and other professional experts, business or other contacts, employees of other organisations, trustees.

*Includes:* personal details, family, extenuating and social circumstances, education and training details, employment details, goods or services provided, physical or mental health or condition, membership details.

### 5. Education

**Purpose Description:** The provision of education or training as a primary function or as a business activity. Administration of education and training (e.g. registration, monitoring and reporting, calculation and publication of exam results, provision of references), provision of education and training (e.g. planning and control of curricula and exams, commissioning, validation and producing educational materials, arrangement of work experience placements), preparation of DFEE returns.

**Data subjects are:** Staff including volunteers, agents, temporary and casual workers, suppliers, complainants, correspondents and enquirers, relatives, guardians and associates of the data subject, advisers, consultants and other professional experts, students and pupils

*Includes:* personal details, family, extenuating and social circumstances, education and training details, employment details, freely given financial details as required, racial or ethnic origin, religious or other beliefs of a similar nature, physical or mental health or condition.

### 6. Educational Support and Ancillary purposes

**Purpose Description:** Educational Support and Ancillary Purposes. To include processing for purposes supplementary to the provision of education and training, administration and provision of health care services, administration and provision of welfare and pastoral services, administration and provision of library services (including membership records, loan/hire records, information and databank administration), careers guidance, planning and administration of events (e.g. social, sports, school trips etc.), organisation of parent-teachers and other associations and events involving parents/guardians of pupils, organisation of alumni and other associations and events involving former pupils and students.

**Data subjects are:** Staff including volunteers, agents, temporary and casual workers, suppliers, complainants, correspondents and enquirers, relatives, guardians and associates of the data subject, advisers, consultants and other professional experts, students and pupils, health professionals, welfare and pastoral professionals and advisors, authors, publishers, editors, artists and other creators, trustees.
Includes; personal details, family, extenuating and social circumstances, education and training details, employment details, freely given financial details as required, racial or ethnic origin, religious or other beliefs of a similar nature, physical or mental health or condition, offences (including alleged offences), student records, disciplinary records.

7. Schools Administration

Purpose Description: Administration and management of school property, planning and administration of repair and maintenance, access, security and safety arrangements, office administration (including office directories, e-mail, word processing, dealing with enquiries and complaints), administration in connection with board and management committee, the administration of supplier records relating to goods, orders, services and accounts provided to the school.

Data subjects are: Staff including volunteers, agents, temporary and casual workers, suppliers, complainants, correspondents and enquirers, relatives, guardians and associates of the data subject, advisers, consultants and other professional experts, students and pupils, trustees, business and other contacts.

Includes; personal details, education and training details, employment details, freely given financial details as required, ra

8. Staff, Agent and Contractor Administration

Purpose Description: The administration of prospective, current and past employees including self-employed, contract personnel, temporary staff or voluntary workers, planning and management of staff workload and/or business activities, administration of agents or other intermediaries, vetting checks, staff training, occupational health service, pensions administration, disciplinary matters, industrial tribunals etc.

Data subjects are: Staff including volunteers, agents, temporary and casual workers, suppliers, relatives, guardians and associates of the data subject, advisers, consultants and other professional experts, agents and contractors, previous and prospective employers of the data subject, and other referees.

Includes; personal details, employment details, freely given financial details as required, goods or services provided, trade union membership*, physical or mental health or condition, offences (including alleged offences).

*It is the right of employees not to disclose this information

9. Crime prevention and Prosecution of offenders

Purpose Description: Crime prevention and detection and the apprehension and prosecution of offenders. Includes the use of closed-circuit television for the monitoring and collection of sound and/or visual images for the purpose of maintaining the security of premises, for preventing crime and for investigating crime.

Data subjects are: Customers and clients, offenders and suspected offenders, members of the public, those inside, entering or in the immediate vicinity of the area under surveillance.
Includes: personal details, goods or services provided, offences (including alleged offences) criminal proceedings, outcomes and sentences, sound and/or visual images, personal appearance and behaviour.

10. Customer Accounts & Records

*Purpose Description:* Keeping accounts related to any business or other activity carried on by the data controller, or deciding whether to accept any person as a customer or supplier, or keeping records of purchases, sales or other transactions for the purpose of ensuring that the requisite payments and deliveries are made or services provided by him or to him in respect of those transactions, or for the purpose of making financial or management forecasts to assist him in the conduct of any such business or activity.

*Data subjects are:* Customers and clients, Suppliers, Complainants, correspondents and enquirers.

*Includes:* customer personal details, freely given customer financial details as required, goods or services provided.

Full details at [https://ico.org.uk/](https://ico.org.uk/)

*To allow a definition as to the meaning of ‘sensitive personal data’ the following list has been included as outlined in the Data Protection Act 1998. Royal Blind would not look to hold all of the following information as detailed:*

**Sensitive personal data (Data protection Act 1998) includes any of the information on:**

- Your racial or ethnic origins.
- Your political opinions *(RB does not hold this information)*
- Your religious beliefs or other beliefs of a similar nature.
- Your membership or otherwise of a trade union.
- Your sexual life. *(RB does not hold this information for employees)*
- Your physical or mental health or condition.
- The commission or alleged commission by you of any offence; or
- Any proceedings or sentence imposed for any offence committed or alleged to have been committed by you.