



Environmental Services Ltd

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DATA PROTECTION POLICY

Seven Ways Environmental Services Limited aims to fulfil its obligations under the Data Protection Act 1998 to the fullest extent. Stephen Wilson has been allocated responsibility for compliance with the Data Protection Act.

In order to operate efficiently, Seven Ways Environmental Services Limited has to collect and use information about people with whom it works. This may include members of the public, current, past and prospective employees, clients and customers and suppliers. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the Act to ensure this.

Seven Ways Environmental Services Limited regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the company and those with whom it carries out business.

Personal information applies to both manual and computerised personal data held in a relevant filing system. This information must be accurate and up-dated as necessary and workers, employees, volunteers, job applicants and ex-employees have the right to see records kept about them.

- Information held on individuals will only be held as long as it is necessary and the company will not hold any information that is unnecessary.
- Data will only be disclosed when legally required to do so or if explicit consent is given by the person on whom the data is held
- No data regarding customers or clients will be released
- The company will identify the relevant filing systems that will be covered by the provisions of the Data Protection Act
- Employees will be informed if they are to be subject to surveillance and monitoring – such monitoring and surveillance will always be proportionate
- Absence records will be kept separate from sickness and accident reports
- Unauthorised access to personal data (manual or computerised) will not be permitted
- Employees must treat all data as confidential as required to do so in their Terms and Conditions of Employment

Access to Employee Data

Procedure

- Employees are allowed to have access to all personal data about them held under the Data Protection Act 1998. This Act requires Seven Ways Environmental Services Limited to respond to requests for access to personal data within 40 days.
- The Data Protection Act 1998 gives individuals the right to have access to their personal data at reasonable intervals. The company will send an annual reminder of this right to each employee. Employees should read this information carefully and inform Stephen Wilson at the earliest opportunity if they believe that any of their personal data are inaccurate or untrue, or if they are dissatisfied with the information in any way.
- In the event of a disagreement between an employee and the company regarding personal data, the matter should be taken up under the company's formal Grievance Procedure.
- Employees have a right to know the information's source and how it will be used, including whether it will go to third parties, such as a payroll bureau.
- Information will only be used for the purpose for which it was gathered.
- All manual files storing employee data will be kept in a secure and locked cabinet at all times.
- The procedure which applies to computerised data will also apply to manual files.

Computer Security

- Seven ways Environmental Services Limited regards the integrity of its computer system as central to the success of the organisation. Its policy is to take any measures it considers necessary to ensure that all aspects of the system are fully protected.
- Laptop computers should not be left unattended and should be stored out of sight in a secure and locked cabinet.
- Databases should not be stored on disks, key drives or other such mobile data storage devices.

Procedure

- Overall computer security is the responsibility of Stephen Wilson. Line managers are responsible for security within their own scope of responsibility.
- On induction employees will be given copies of the computer security policy and will receive instructions on security procedures.
- Computer training at every level will emphasise the importance of security.
- Information held on record should not be used for a different purpose from the one it was gathered for.
- All incoming emails may be monitored and scanned for viruses before being released to the recipient.
- Employees with access to personal data must bear in mind at all times the provisions of the Data Protection Act and must not disclose any data to unauthorised persons.
- Passwords must be used at all times and changed regularly. Employees should not select obvious passwords. All passwords must be kept confidential. Employees must not give their passwords to other members of staff or to any person outside the organisation.
- The safekeeping of CDs and DVDs sent from external sources is the responsibility of the person to whom it was sent. CDs and DVDs generated internally must be kept in a secure place.
- Misuse of computers is a serious disciplinary offence.
- This list is not exhaustive. Depending on the circumstances of each case, misuse of the computer system may be considered gross misconduct.
- Management, in consultation with specialist auditors, may institute confidential control techniques and safeguards.

All breaches of computer security must be referred to Stephen Wilson Where a criminal offence may have been committed Stephen Wilson will consult on whether to involve the police.

Signed:  Steve Wilson Director Date: 1st September 2009

Signed:  Michael Connolly Director Date: 1st September 2009