



CPB
NORTHWEST LTD

CPB Northwest Ltd

CPB NW / POL / 12

DATA PROTECTION POLICY

Issue 1 – May 2020
Review date: May 2021

CPB Northwest Ltd (CPB NW) recognises that to carry out its services, it must collect and use personal data relating to the people with whom and for whom it works. 'Personal data' means any information relating to a living individual from which that individual may be identified (including, for example, their name, address or payroll number), whether by itself or taken together with other information in the possession of CPB NW.

CPB NW will manage any personal data in accordance with the Data Protection Act 1998 and other related legislation, in whichever manner that such data is collected, recorded or used (whether on paper, databases, emails, CCTV or telephone records, or recorded by any other means). CPB NW follows the 8 data protection principles set out in the Data Protection Act 1998 and understands its obligations to ensure that personal data is managed fairly, lawfully, accurately, and securely. These principles require that personal data, including that of its employees and third parties **must be:**

- Processed fairly and lawfully
- Obtained only for specified and lawful purposes and shall not be processed in any manner which is incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate and kept up-to-date
- Kept for no longer than is necessary
- Processed in accordance with the rights of data subjects under the Act
- Processed securely (preventing unauthorised or unlawful processing, accidental loss, destruction or damage)
- Adequately protected when transferred outside of the European Economic Area

CPB NW holds Personal Data which is directly relevant to its employees. That data will be held and processed in accordance with the data protection principles above and with this Policy. The following data may be collected, held, and processed by CPB NW:

- Identification information relating to employees including, but not limited to, names and contact details
- Equal opportunities monitoring information including age, gender, race, nationality and religion
- Health records including details of sick leave, medical conditions, disabilities and prescribed medication
- Employment records including, but not limited to, interview notes, curricula vitae, application forms, assessments, performance reviews and similar documents
- Details of salaries including increases, bonuses, commission, overtime, benefits and expenses
- Records of disciplinary matters including reports and warnings, both formal and informal
- Details of grievances including documentary evidence, notes from interviews, procedures followed and outcomes

Implementation of the Data Protection Principles will be achieved by CPB NW ensuring that:

- Internal and external individuals are available to provide advice and assistance on issues arising under the DPA
- Everyone managing and handling personal information understands they are responsible for following good data protection practice and is appropriately trained and supervised
- Personal data will only be accessed by those authorised to do so
- Appropriate efforts will be made to ensure that all stored data is accurate and updated as necessary, password protected and that data which is obsolete or no longer required is destroyed with appropriate regard paid to the confidentiality of that information
- A regular review is made of the way personal information is managed

The responsibility for compliance primarily rests with CPB NW. However, every employee has an individual responsibility to ensure compliance and can be held legally accountable.

Signed:

Eamonn Burke (*Director*)

Dated: 1st May 2020