**Employee data policy**

The Company is required to comply with the requirements of the Data Protection Act 1998 (“DPA”) in relation to how it holds and/or uses certain data.

This policy sets out the kinds of data that the Company holds for its Employees and the purpose(s) that this data is held for.

The Company’s Data Compliance Officer, with overall responsibility for compliance with the DPA, is *[insert name]*.

**Policy statement**

All employees are required to comply with their obligations under the DPA, in relation to data/information about other employees. Employees in positions that require use of data/information about employees will be given separate specific guidance on these obligations. Employees must ask the Company’s Data Compliance Officer if they are unsure of their obligations.

If any employees fail to comply with these obligations, their failure will be regarded as serious misconduct under the Company’s disciplinary procedure.

**Types of data held**

The following types of data may be held by the Company, as appropriate, on its employees:

* conduct issues such as letters of concern, disciplinary proceedings
* CVs and other information gathered during recruitment
* holiday records
* internal performance information
* job title, job descriptions and pay grades
* medical or health information
* name, address, phone numbers - for the employee and next of kin
* National Insurance numbers
* references from former employers
* sickness absence records
* tax codes
* terms and conditions of employment
* training details.

The Company believes its use and storage of this data/information is consistent with the employment relationship and the principles of the DPA. The Company needs to store information about its employees for operational efficacy. Accordingly, this data will be held for management and administrative purposes, as necessary, throughout employment, and for as long a period as is necessary following the termination of employment.

It may be necessary on occasion to disclose some data/information about employees to relevant third parties. We may also transfer data/information to another Associated Company within the Group, solely for purposes connected with the ongoing employment of the employee or efficient management of the Company’s business activities.

**Data disclosures**

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

* any employee benefits operated by third parties
* disabled employees - whether any reasonable adjustments are required to assist them at work
* employee’s health data - to comply with health and safety or occupational health obligations towards the employee
* for Statutory Sick Pay purposes
* HR management and administration - to consider how an employee’s health affects his or her ability to do their job
* The smooth operation of any employee insurance policies or pension plans

These kinds of disclosures will only be made when strictly necessary for the purpose.