

Data Protection



Trouble Tongues recognises the need to comply with the various laws regulating the processing of personal data. It is our desire that employees recognise the risks involved when dealing with such information and fully understand the steps that must be taken in order to minimise such risks. It is Trouble Tongues' policy to educate and inform employees about the dangers of inappropriate and illegal use of the personal data they may have access to.

Whenever you are involved in processing any personal data, you must ensure that all associated procedures have been sanctioned by your manager. You must only operate within sanctioned procedures: -

- If for any reason registration of the information is withdrawn you must stop using the particular data immediately. Your manager will advise you of this
- You must ensure that your appropriate records are maintained and safe and are only used to perform your particular job
- You must ensure that all personal data is used, held and disclosed only for the registered purpose: you should not use any of the systems outside of these criteria
- Information must be collected and processed in a prudent and lawful manner and should be kept up to date and accurate at all times
- Information must not be transferred to countries outside the EU without authorisation from your Line Manager
- The information should only be retained for the period necessary, and for the purpose for which it is held

If you have any concerns or questions regarding the processing or use of personal data you should contact your manager as soon as possible. If in any doubt you should cease to process the information.

If you are required to use electronic equipment such as a computer or data-holding device your actions should comply with this and the ICT Use Policy. It is your responsibility to ensure that reasonable measures are taken to ensure the security of information contained within them. Such measures include keeping equipment in a lockable location when not in use and/or using password protection for files containing information covered by data protection legislation.

A breach of the data protection regulations or failure to adhere to Trouble Tongues' policies could have serious repercussions for Trouble Tongues and for yourself, if you are found responsible. It may also be treated as a serious disciplinary matter and may result in the termination of your employment.

If you are aware of any breach of Data Protection you must bring it to the attention of your Line Manager immediately. Any failure to do this may result in disciplinary action against you.

If you have access to or are responsible for collecting personal information that relates to any of Trouble Tongues' clients or employees, the above guidelines should be strictly adhered to.

As a member of staff, you need to be aware that Trouble Tongues will hold details pertinent to your employment on file as part of its personnel records. This may include sensitive information. This information may be processed for administrative or legal purposes or as required by your continued employment. This may include passing certain employment related data to third parties such as government authorities, suppliers or contractor organisations supplying services which require the use or creation of employee data (for example, payroll). Your data may also be used in emergency situations, to protect the legal interests and other rights of, Trouble Tongues or in other situations where you have consented to the disclosure of such information.

The following are examples of information which may be retained by Trouble Tongues as part of its personnel records. The list is not exclusive or exhaustive: -

- References obtained during recruitment
- Details of terms of employment
- Payroll, tax and National Insurance information
- Performance information
- Details of grade and job duties

- Health records
- Absence records, including holiday records and self-certification forms
- details of any disciplinary investigations and proceedings
- Training records
- Contact names and addresses

It should also be noted that Trouble Tongues might hold the following information about you, for which disclosure will be made only when strictly necessary for the purposes set out below: -

- Your health, for the purposes of compliance with our health and safety and our occupational health obligations
- For the purposes of personnel management and administration, for example, to consider how your health affects your ability to do your job and, if you are disabled, whether you require any reasonable adjustment to be made to assist you at work
- The administration of insurance, pension, sick pay and other related benefits in force from time to time
- In connection with unspent convictions to enable us to assess your suitability in employment for relevant roles

Trouble Tongues will endeavour to update personnel files on a regular basis. It is your responsibility to ensure that any changes in personal details are communicated in writing to

Trouble Tongues immediately, or as soon after the change as is practicable; and to inform your next of kin (or whoever you give as an emergency contact) that their details may be held on a personnel file.