



5 E Ltd

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Data Protection Policy

The following document outlines 5 E Ltd's (hereinafter referred to as organisation) Data Protection Policy

The Data Protection Act 1998 came into force in March 2000. This act regulates the processing of information, and covers computerised records as well as manual filing systems.

5E OBLIGATIONS

Personal information may relate to members of staff, customers, volunteers and other members.

5 E Ltd will hold the minimum personal information necessary to enable them to perform its contractual obligations under the current Data Protection legislation.

5 E Ltd processes personal data in accordance with current statutory legislation.

5 E paid staff and volunteers will observe and implement the following main principles of the current Data Protection Act mentioned below;

- Fairly and lawfully processed
- Processed for specified purposes
- Adequate, relevant and not excessive
- Be accurate and kept up to date
- Be held for no longer than necessary
- Be accessible to individuals
- Kept secure- must take appropriate steps to maintain security- that is, prevent unauthorised

processing or accidental loss, damage or destruction

- Data must not be transferred abroad unless that country maintains similar data protection rights or other conditions are met.

5 E staff who process or use personal data will ensure they abide by these principles at all times. This policy has been developed to ensure this happens. 5 E obligations will apply to;

(a) Customers

Customers who receive 5 E services may be subject to eligibility criteria attached by the funding body for utilising their funds to provide this service. This will mean checking and keeping evidence to confirm customer's eligibility. The main criteria for which evidence is required are:

- (1) Name and address details
- (2) Telephone number
- (3) NI number
- (4) Evidence of UK and EU Residency Test of 3 years
- (5) Right to work,- Copy of passport or birth certificate
- (6) Certification and/or educational details where these are required by legislation or as a minimum standard for a particular occupation.

The attending services at 5 E Ltd are required to bring with them in accordance with funding body regulations, the following information relating to their employment status, education, other qualification details, personal details including name, address and contract number only)

(b) Staff

In relation to the staff of 5 E the information requirements mentioned under the customer heading is required in addition to the following information mentioned below;

- Bank Details (Pay roll purposes)
- Appraisals

5 E will process data about you only so far as is necessary to fulfil its contractual obligations under the current statutory legislation.

Data will not be disclosed to anyone else other than the authorised personnel from 5E funding bodies or their authorised agents and government agencies under exempt legislation or for legal purposes.

5 E will take all reasonable steps to ensure that the data it processes is accurate. Data regarding customers will be retained as necessary during the course of their training and records will be retained for up to ten years or any reasonable period required by the funding authority after the data that you leave the training in case legal proceedings arise during that period. Data will be retained for the necessary period required if it is material to legal proceedings. All data being held and stored will be kept in a secured location with access available to only authorised personnel.

5 E will ensure that data will be kept in a secure system whether manual or computerised in accordance with the good practices set out by the current data protection legislation.

The staff and customer induction book containing the organisation's policies are available to the respective group in paper and electronic form.

Training

Training on confidentiality; data protection, freedom of information and IT security will be included in the organization's training and development plan. This will also be part of your induction training which is provided to all new members of staff.

Removal or Change of access

When a member of staff leaves or changes post within the organisation, their line managers must ensure the following:

- Rights of access to computer systems are rescinded or changed to meet the needs of the staff's new post
- Ownership of files and documents (held in any format) are transferred to another appropriate member of staff or line manager
- Any of property belonging to 5 E Ltd is returned e.g. varying from keys to various types of office equipments such as mobiles, memory storage devices.
- Rights of access to filing cabinets and other secured locations holding information are rescinded or changed

STAFF OBLIGATIONS

All staff will observe and implement the confidentiality of personal information and to adhere to the following guidelines below;

- Access to areas, departments of offices containing confidential information must be restricted to authorized personnel, funding body and their appointed agents only

- Information of a personal nature must not be left unattended as far as humanly possible.
- Staff not permitted to access any information regarding customers or employee records for which they have no proper reason to do so in the course of their duties at 5 E.
- Under any circumstances should be information be removed from the secured locations of 5 E premises.
- All staff to ensure that any personal data they hold whether in electronic or paper format is kept securely at all times.
- All staff to ensure that personal information is not disclosed deliberately or accidentally either orally or in writing to any unauthorized third party.
- Staff is contractually obliged to abide by this policy. Any breach of confidentiality must be reported to a line manager concerned. Any breach of this policy will be considered as a gross misconduct offence and will be dealt with in accordance with 5 E's disciplinary procedure.

Any member of staff who considers that the policy has not been followed in respect of personal information should first raise the matter with their line manager. If it is not resolved then write to the Director. If it is still unresolved then raise it under a grievance procedure.

Staff to ensure they comply with the practice of confidentiality and data protection, as instructed in their staff induction.

Electronic Data/Hard Copy Files

Files and folders containing customer and/or staff information must be kept in a secured location (Filing cabinets and locked rooms) and be locked at all times. Access to information from a secured location will only be available to authorized personnel, funding body and their appointed agents.

All computer access must be password controlled. Passwords must be constructed to minimize the

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possibilities of either being memorized by an onlooker or a guessed by a hacker or colleague. Staff must change their password at regular intervals or at any time they suspect that their password has become known.

Managers must determine what systems staff can access and to what level of access. The manager ensures staff receives the necessary training on security and information handling.

CUSTOMER OBLIGATIONS

Customers must ensure that all personal information about themselves they provide to 5 E Ltd is accurate and up-to-date e.g. changes of address are reported to 5 E without delay.

To ensure the confidentiality of personal information, the following guidelines must be followed:

- Recorded information of a personal nature must not be left unattended.
- Customers must not remove any records (their own or fellow customers) relating to their training from the premises of 5 E

A customer who uses 5 E's facilities must comply with the rules and regulations of 5 E. Misuse may result in disciplinary proceedings.

ACCESS TO INFORMATION

Staff and customers have the right to access personal data that is being kept about them in so far as it falls within the current statutory legislation.

Any person wishing to access their personal data can do so by requesting in writing to the Managing Director @ 5 E Ltd, Selby Centre, Selby Road, Tottenham, London, N17 8JL.

5 E Ltd aims to comply with the request for access to personal information as quickly as possible, but

5 E Ltd will endeavour to complete this request within forty days.

5 E Ltd does not need to comply with a request where it has received an identical or similar request from the same individual unless a reasonable interval has elapsed between compliance with the original request and the current request.

Where disclosure of data would necessarily mean that information relating to a third party would be disclosed 5 E Ltd **may** refuse to disclose it unless the third party consents or it is reasonable to disclose the information without such consent.

Should you wish to bring any inaccuracy in disclosed data to the attention of 5 E you must do so in writing to the Managing Director @ 5 E Ltd, Selby Centre, Selby Road, Tottenham, London, N17 8JL. In appropriate circumstances you may find that arranging an appointment with your manager to hand him/her your written notification of any inaccurate data is preferable.

It is 5 E's policy to ensure that all data is as accurate and to rectify any inaccuracies that occur swiftly.

5 E Ltd will comply with practices in accordance with current statutory legislation.

Review of Policy

This was reviewed in June 2018 and is due for next review in June 2019 or as and when legislation changes.

If you require this policy in a larger font size, please contact the HR Department.