

KILMARNOCK LEISURE TRUST T/A THE GALLEON CENTRE

DATA PROTECTION POLICY

1. Introduction

Data protection compliance is seen as an integral part of the Kilmarnock Leisure Centre Trust employment practice. We will develop a culture in which respect for private life, data protection, security and confidentiality of personal information is viewed as the norm.

2. Good Practice – Managing Data Protection

The Trust will ensure that data is always processed in accordance with the provisions of the Data Protection Act 1998.

In processing data the following principles will be adhered to:

- Personal data will be processed fairly and lawfully. Normally, the Trust will seek to obtain the consent of the Employee to the processing of personal data. In relation to the processing of sensitive personal data (which is personal data relating to race/ethnic origins, political, religious or other similar beliefs, sexual life, medical condition, commission of any offence, criminal proceedings or sentences, or trade union membership), explicit consent to any processing will normally be obtained.
- Personal data will be obtained for one or more specified and lawful purposes, and will not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data will be adequate, relevant and not excessive.
- Personal data will be accurate and, where appropriate, kept up to date.
- Personal data will not be retained for longer than is necessary.
- Personal data will be processed in accordance with the rights of data subjects as defined by the 1998 Act.
- Appropriate measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data will not be transferred to countries outside the European Economic Area unless there are adequate measures in place to protect data subjects (Employees).

3. Recruitment and Selection

The KLCT will have a Recruitment Code of Practice to be followed at all times.

4. Access to Data

Employees have the right to request that the Company specify whether personal data of which he or she is the subject is being processed by the Company and to be given a description of the data, the purposes for which it is being processed and to whom it may be disclosed.

Employees have the right to obtain a copy of any personal data held. To exercise this right a written request should be made to the Office Manager specifying the information sought. A charge of £10 will be made for the information and, in accordance with the 1998 Act, shall be provided within the 40 day period following the date on which the Galleon Centre is in receipt of both the written request and the £10 charge. Note that information requested which contains details relating to another individual will not normally be released (except in amended form) without that individual's consent. In addition, the Galleon Centre will not normally release any information relating to references given by the Galleon Centre on behalf of the Employee, management planning, information relating to negotiations with an Employee, e.g. over pay or any other information it is entitled to withhold under the 1998 Act

5. Processing Data

The Galleon Centre will conduct regular reviews of the information held by it to ensure the relevancy of the information it holds. Data will normally only be held for a limited period of time. Where an Employee leaves the Galleon Centre, personal data will be kept only for such a period as may be necessary to protect the interests of the Galleon Centre and the Employee.

Employees are under a duty to inform the Galleon Centre of any changes to their current circumstances. Where an Employee has concerns regarding the accuracy of personal data held by the Galleon Centre, the Employee should contact the Office Manager to request an amendment to the data.

6. Security of Data

The Trust will take appropriate measures to prevent unauthorised access to personal data and in particular any sensitive personal data held.

In particular, access to personal data by managers and other Employees of the Trust will be restricted only to those individuals who have legitimate business reasons for requiring the information.

Not only could such an event cause adverse publicity for the Trust but, if the Employee is the person responsible for the infringement, the Employee could be the subject of a personal criminal prosecution and liable to a fine. It is

important to keep the penalties in perspective, however. If the Employee follows the advice given below and takes sensible and reasonable precautions to protect information in the Employee's case there should be few, if any, problems.

- Observe to the letter any instruction or guidelines issued by the Trust in relation to data protection and your work.
- Observe the data protection principles set out in the 1998 Act at all times.
- Take confidentiality and security seriously whether the Employee considers the information to be sensitive or not. In particular:-
 - do not disclose your password;
 - change your password regularly;
 - do not gossip about Trust data;
 - do not leave Trust data in the street, on the train, or on, the bus etc.;
 - do not take computer scrap paper home; and
 - do not allow unauthorised use of computer equipment issued by the Trust.
- Always ensure that data is input correctly. Do not delay in inputting new data when available.
- Do not make any oral or written reference to personal data held by the Trust about any individual except to Employees of the Trust who need the information for their work or a registered recipient.
- Take great care to establish the identity of any person asking for personal information. Make sure that the person is entitled to receive the information.
- If an Employee is asked by an individual to provide details of their personal information held by the Trust the Employee should ask that they put their request in writing and send it to the General Manager. If the request is in writing pass it immediately to General Manager.
- Do not use personal information for any purpose other than your work for the Trust.
- If the Employee is in doubt about any matter to do with data protection do not guess - refer the matter to your manager immediately.