



Thompsons of Prudhoe Group of Companies* Policy Statement

*The Thompsons of Prudhoe Group of Companies comprise:

Thompsons of Prudhoe Holding Ltd, Thompsons of Prudhoe Ltd, W & M Thompson (Quarries) Ltd & Tyneside Minimix (Concrete) Ltd
Registered Offices: Thompson House, Princess Way, Low Prudhoe, Northumberland, NE42 6PL

DATA PROTECTION POLICY

This policy applies to:

- the UK Registered offices of the Thompsons of Prudhoe Group of Companies together hereafter referred to as "the Group";
- its sites, remote offices and regions;
- all workers operating on behalf of the Group.

The purpose of this policy is to enable the Group to:

- comply with the law in respect of the data it holds about individuals;
- follow good practice;
- protect the Group's staff, consultants, sub-contractors and other individuals and protect the organisation from the consequences of a breach of its responsibilities.

This policy applies to information relating to identifiable individuals, even where it is technically outside the scope of the Data Protection Act, by virtue of not meeting the strict definition of 'data' in the Act.

The Group will:

- comply with both the law and good practice
- respect individuals' rights
- be open and honest with individuals whose data is held
- provide appropriate training and support for staff and consultants who handle personal data, so that they can act confidently and consistently

The Group recognises that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:

- keeping information securely in the right hands, and
- holding good quality information.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, the Group will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

The Group has identified the following potential key risks, which this policy is designed to address:

- Breach of confidentiality (information being given out inappropriately) —
- Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access - especially at branch level.
- Failure to establish efficient systems of managing changes to employees, leading to personal data being not up to date.
- Harm to individuals if personal data is not up to date
- Insufficient clarity about the way workers' or clients' staff personal data is being used e.g. given out to general public.
- Failure to offer choices about use of contact details for staff





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The Data Protection Officer is the HR Director Helen Hillary with the following responsibilities:

- Briefing the Group's boards on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors

The Head Office HR department where personal data is handled is responsible for drawing up the Group's operational procedures (including induction and training) to ensure that good Data Protection practice is established and followed.

All staff handling personal data are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

Significant breaches of this policy will be handled under the Group's disciplinary procedures

Access

Any subject access requests will be handled by the Data Protection Officer

Subject access requests must be in writing. All staff and volunteers are required to pass on anything which might be a subject access request to the Data Protection Officer without delay.

All those making a subject access request will be asked to identify any Group personnel who may also hold information about them, so that this data can be retrieved.

Where the individual making a subject access request is not personally known to the Data Protection Officer their identity will be verified before handing over any information.

The required information will be provided in permanent form unless the applicant makes a specific request to be given supervised access in person.

This Policy Statement Shall be reviewed annually, and following any significant change or development in the Group's business operations.

Signed: 

Date: 10.8.17

Helen M Hillary
HR Director
Thompsons of Prudhoe Group

TOP/QMS/0006

