



admiral
T A V E R N S

DATA PROTECTION POLICY

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IPOLICY STATEMENT

Admiral Taverns Group Holdings Limited and its subsidiary companies (hereinafter Admiral Taverns) collects and uses information about people with whom it communicates. This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the Data Protection Act 1998.

Admiral Taverns regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain confidence between those with whom it deals. To this end Admiral Taverns fully endorses and adheres to the Principles of Data Protection, as set out in the Data Protection Act 1998.



DATA PROTECTION POLICY

PURPOSE

The purpose of this policy is to ensure that the staff, volunteers and trustees of Admiral Taverns are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Failure to adhere to the Data Protection Act 1998 is unlawful and could result in legal action being taken against Admiral Taverns or its staff, volunteers or trustees.

PRINCIPLES

The Data Protection Act 1998 regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice which underpin the Act. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this Admiral Taverns follows the eight Data Protection Principles outlined in the Data Protection Act 1998, which are summarised below:

- I. Personal data will be processed fairly and lawfully;
- II. Data will only be collected and used for specified purposes;
- III. Data will be adequate, relevant and not excessive;
- IV. Data will be accurate and up to date;
- V. Data will not be held any longer than necessary;
- VI. Data subject's rights will be respected;
- VII. Data will be kept safe from unauthorised access, accidental loss or damage; and
- VIII. Data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

The principles apply to "personal data" which is information held on computer or in manual filing systems from which they are identifiable. Admiral Taverns' employees, volunteers and trustees who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

PROCEDURES

The following procedures have been developed in order to ensure that Admiral Taverns meets its responsibilities in terms of Data Protection. For the purposes of these procedures data collected, stored and used by Admiral Taverns falls into 2 broad categories:

1. ADMIRAL TAVERNS INTERNAL DATA RECORDS;

Staff, volunteers and trustees (hereinafter 'Internal Data Owners')

2. ADMIRAL TAVERNS EXTERNAL DATA RECORDS;

Tenants, licensees, members, customers, clients, agents, professional advisers, suppliers, distributors, complainants, correspondents and enquirers (hereinafter 'External Data Owners')

Admiral Taverns as a body is a Data Controller under the Act, and the Compliance Officer is ultimately responsible for the policy's implementation.

INTERNAL DATA RECORDS

PURPOSES

Admiral Taverns obtains personal data (names, addresses, dates of birth, phone numbers, email addresses), application forms, and references and in some cases other documents from its Internal Data Owners. This data is stored and processed for the following purposes:

- Recruitment
- Equal Opportunities monitoring
- Volunteering opportunities
- To distribute relevant organisational material
- Payroll and employee benefits

ACCESS

The contact details of Internal Data Owners will only be made available to other staff, volunteers and trustees. Any other information supplied on application will be kept in a secure filing cabinet and is not accessed during the day to day running of the organisation.

Contact details of Internal Data Owners will not be passed on to anyone outside the organisation without their explicit consent.

A copy of Internal Data Owners emergency contact details will be kept in the Emergency File for Health and Safety purposes to be used in emergency situations e.g. injury / hospitalisation.

Internal Data Owners will be supplied with a copy of their personal data held by the organisation if a request is made.

All confidential post must be opened by the addressee only or with their consent.

ACCURACY

Admiral Taverns will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an employee, volunteer or trustee has worked for the organisation and brief details for longer. Unless the organisation is specifically asked by an individual to destroy their details it will normally keep them on file for future reference. The Office Manager has responsibility for destroying personnel files.

STORAGE

Personal data is kept in paper-based systems and on a password-protected computer system. Every effort is made to ensure that paper-based data are stored in organised and secure systems. Admiral Taverns operates a clear desk policy at all times.

USE OF PHOTOGRAPHS

Where practicable, Admiral Taverns will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisations website or in the Newsletter.

EXTERNAL DATA RECORDS

PURPOSES

Admiral Taverns obtains personal data (such as names, addresses, dates of birth, national insurance numbers, bank details, proof of identity and phone numbers) from External Data Owners. This data is obtained, stored and processed solely to assist staff and volunteers in the efficient running of services. Personal details supplied are used to assess the credit score of a tenant, licensee or customer and to send material that is potentially useful. Most of this information is stored on Admiral Taverns' database.

Admiral Taverns obtains personal data and information from External Data Owners in order to provide services related to the running of the business.

This data is stored and processed only for the purposes outlined in the agreement and service specification signed by the External Data Owner OR where the data controller is subject to statutory obligation/s OR for the purposes of legal enforcement OR where the request to do so is exempt from the Act.

CONSENT

Personal data is collected over the phone, on-line and using other methods such as face to face, e-mail and postal services. As part of this initial contact process, the data owner is given an explanation of how this information will be used. Written consent is not requested as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty to do so or disclosure under other legislation is required, in which case the Compliance Officer will discuss and agree disclosure with the Director/s.

Contact details held on the Admiral Taverns' database may be made available to groups / individuals outside of the group. Individuals are made aware of when their details are being collected for the database and their verbal or written consent is requested.

ACCESS

Only the organisation's staff, volunteers and trustees will normally have access to personal data. All staff, volunteers and trustees are made aware of the Data Protection Policy and their obligation not to disclose personal data to anyone who is not supposed to have it.

Information supplied is kept in a secure filing, paper and electronic system and is only accessed by those individuals involved in the delivery of the service.

Information will not be passed on to anyone outside the group without their explicit consent, excluding statutory bodies and those that fall exempt from the Act.

Individuals will be supplied with a copy of any of their personal data held by the group if a request is made.

All confidential post must be opened by the addressee only or with their consent.

ACCURACY

Admiral Taverns will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for as long as the data owner uses our services and normally longer. Where an individual ceases to use our services and it is not deemed appropriate to keep their records, their records will be archived and later destroyed. However, unless we are specifically asked by an individual to destroy their details, we will normally keep them on file for future reference.

This procedure applies if Admiral Taverns is informed that an organisation ceases to exist.

STORAGE

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

Admiral Taverns operates a clear desk policy at all times.

USE OF PHOTOGRAPHS

Where practicable, Admiral Taverns will seek consent of individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisation's website or in the Newsletter.

CRIMINAL RECORDS BUREAU (CRB)

Admiral Taverns Limited will act in accordance with the CRB's code of practice.

Copies of disclosures are kept for no longer than is required. In most cases this is no longer than 6 months in accordance with the CRB Code of Practice. There may be circumstance where it is deemed appropriate to exceed this limit e.g. in the case of disputes.

RESPONSIBILITIES OF STAFF, VOLUNTEERS AND TRUSTEES

During the course of their duties with Admiral Taverns, staff, volunteers and trustees will be dealing with information such as names, addresses, dates of birth, phone numbers and e-mail addresses of External Data Owners. They may be told or overhear sensitive information while working for Admiral Taverns, the Data Protection Act (1988) gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Staff, paid or unpaid must abide by this policy.

To help staff, volunteers, trustees meet the terms of the Data Protection Act; the attached Data Protection / Confidentiality statement has been produced. Staff, volunteers and trustees are asked to read and sign this statement to say that they have understood their responsibilities as part of the induction programme.

COMPLIANCE

Compliance with the Act is the responsibility of all staff, paid or unpaid. Admiral Taverns will regard any unlawful breach of any provision of the Act by any staff, paid or unpaid, as a serious matter which will result in disciplinary action. Any employee who breaches this policy statement will be dealt with under the disciplinary procedure which may result in dismissal for gross misconduct. Any such breach could also lead to criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy statement should in the first instance be referred to the line manager.

RETENTION OF DATA

No documents will be stored for longer than is necessary. For guidelines on retention periods see the Data Retention Schedule.

All documents containing personal data will be disposed of securely in accordance with the Data Protection principles.

REAL COMMUNITY COMMITMENT

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