EMPLOYEE DATA RESPONSIBILITY POLICY

Policy Number: 38

Document Control

Owner	Reviewers	Approver
Head of People & Performance	Head of People & Performance Head of Internal Audit SMT	Head of People & Performance Head of Internal Audit Head of I&C

Version	Date Issued	Status	Description	Review Date
Finalv1.0	8th May 2018	Final	New policy for GDPR.	Apr 2019

Policy

All employees, particularly those tasked with regularly handling personal data of colleagues or third parties, have responsibility for ensuring that processing meets the standards set out in this policy. Employees should observe, as a minimum, the following rules:

1. Employees must observe to the letter any instruction or guidelines issued by the Society in relation to data protection.
2. Employees should not disclose personal data about the Society, colleague or third parties unless that disclosure is fair and lawful, in line with this policy;
3. Employees must take confidentiality and security seriously, whether the employees considers the information to be sensitive or not.
4. Any personal data collected or recorded manually which is to be inputted to an electronic system should be inputted accurately and without delay and the paperwork should either be securely held or securely destroyed. Guidance will be provided at a departmental level.
5. Employees must not make any oral or written reference to personal data held by the Society about any individual except to employees of the Society who need the information for their work.
6. Great care should be taken to establish the identity of any person asking for personal information and to make sure that the person is entitled to receive the information, if you are unsure you must check with your line manager.
7. If an employee is asked to provide details of personal information held by the Society the employee should ask the requestor to put their request in writing and send it to the Data Privacy Manager. If the request is in writing the employee should pass it immediately to the Data Privacy Manager.
8. Employees must not use personal information for any purpose other than their work for the Society.
9. If an employee is in doubt about any matter to do with data protection they must refer the matter to their line manager **OR** Head of People and Performance immediately.
10. Employees should ensure they have read the details of the Society's Computer Use policy, Mobile Phone Policy and Social Media policy which are available on SharePoint and the employee hub.
11. System passwords should not be disclosed and should be changed regularly;
12. Employees or third party personal data should not be left unsecured or unattended, e.g. on public transport;
13. Employees must follow the Society's "clear desk" policy and ensure that all confidential information, whether containing employees or third party personal data or not, is secured when it is not in use or when the employee is not at work.
14. Employees should only use Society equipment to carry out work where they are processing personal or sensitive information and must ensure that devices are password protected and locked when not in use. Extracts of personal or sensitive data should not be taken outwith the protection of the Society's computer network.
15. As far as possible, employees or third party personal data contained in emails and attachments should be anonymised before it is sent by email; and
16. Documents containing sensitive information should be password protected and, if the document requires to be transmitted, the document and password should be transmitted separately. Passwords must be complex, at least ten characters long, and include numbers and special characters. The password should be for one time use only.
17. This policy is revised periodically, as the need arises, and updates published on Scotmid's intranet.

Related Policies and Documents:

This policy should be read in conjunction with the following other Scotmid policies and documents:

a) Staff Handbook
b) Computer Use Policy
c) Mobile Device Policy
d) Social Networking Policy

DECLARATION

I confirm that I have received a copy of this policy and that I have read and understood it.

Name: _____

Signature: _____ Date: _____