



Data & Information Security

Policy Document

This is a statement of data protection policy adopted by Sure Group.

1. Sure Group Commitment

This Policy has been amended so that it directly supports the best practice contained in British Standard BS 10012.

The Sure Group needs to collect and use certain types of personal information on for example current, past and prospective employees, suppliers, clients/customers, and others with whom it communicates.

In addition, it may occasionally be required by statute to collect and use certain types of information to comply with the requirements of government departments.

This personal information must be dealt with properly irrespective of how it is collected, recorded, used and disposed of - whether on paper, in a computer, or recorded on other material - and there are safeguards to ensure this in the Data Protection Act 1998.

We regard the lawful and correct treatment of personal information as critical to successful operations, and to maintaining members' confidence in us.

To maintain our reputation and integrity as an open and professional organisation we need to be fully compliant with this legislation.

To this end we fully endorse and adhere to the Principles of data protection, as dictated in the Data Protection Act 1998 – in summary these state that personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose

- Be adequate, relevant and not excessive for those purposes
- Be accurate and kept up to date
- Not be kept for longer than is necessary for that purpose
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorised access, accidental loss or destruction
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

2. Policy Status

Sure Group takes its data protection responsibilities very seriously. It is a condition of employment that employees will abide by the rules and policies made by Sure Group. Any failure to follow the policy can therefore result in disciplinary action.

3. Our Disciplines

3.1 Overall Approach

As part of our commitment to data protection, we will:

- Observe fully conditions regarding the fair collection and use of information
- Meet our legal obligations to specify the purposes for which information is used;
- Collect and process appropriate information only to the extent that it is needed to fulfill operational needs or to comply with any legal requirements
- Ensure the accuracy of information used
- Apply strict checks to determine the length of time information is held
- Ensure that the rights of people about whom information is held can be fully exercised under the Act

- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards.

In addition, we will ensure that:

- Everyone managing and handling personal information understands that they are responsible for following good data protection practice;
- Everyone managing and handling personal information is appropriately supervised and trained to do so
- Anybody wanting to make enquiries about handling personal information knows what to do
- Queries about handling personal information are promptly and courteously dealt with
- Methods of handling personal information are clearly described
- A regular review and audit is made of the way personal information is managed
- Methods of handling personal information are regularly assessed and evaluated
- Performance in the handling of personal information is regularly assessed and evaluated.

3.2 Notification of Data Held and Processed

All staff, customers and other users are entitled to:

- Know what information Sure holds and processes about them and why
- Know how to gain access to it
- Know how to keep it up to date
- Know what Sure is doing to comply with its obligations under the 1998 Act.

3.3 The Data Controller

Sure Group as a body corporate is the Data Controller under the Act, and the board is therefore ultimately responsible for implementation. However, there are designated Data Controllers dealing with day to day matters.

The first point of contact for enquirers is:

**Simon Marsh, Exec Director
- Data Protection Controller,
Telephone 0151 494 5803
Email: smarsh@suregroup.co.uk**

3.4. Data Security

All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely
- Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Personal information should be:

- Kept in a locked filing cabinet; or
- In a locked drawer; or
- If it is computerised, be password protected; or
- Kept only on disk which is itself secure.

3.5. Disposal of Data

When personal data is no longer required, or has passed its retention date, paper records must be shredded. If there is a significant amount of material which cannot be dealt with by normal shredding machines, this should be disposed of using a reputable disposal contractor.

Computerised records must be permanently deleted, with particular care taken that 'hidden' data cannot be recovered. The IT Department can advise on permanent deletion of computerised records.

3.6 Concluding Statement

Compliance with the 1998 Act is the responsibility of all employees and supply chain members. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the designated Data Controller, Simon Marsh.



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