

EMPLOYEE RECORDS DATA PROTECTION POLICY



The Institute
of Contemporary
Music Performance

Version number	Date approved (including committee)	Reason for production/revision	Author	Proposed next review date
V1.1	IGG Sept 2023	Periodic review	Head of HR	Q1 2025-26
V1.0	Sept 2021 ExCo	Alignment with the Information Governance Framework	Head of HR	Biennially and as required

Related policies

Data Protection Policy
Freedom of Information Policy
Records Management Policy
Data Security Policy
Email Use Policy
Acceptable Use of IT Policy
Bring Your Own Device Policy
Business Continuity Policy
Staff Disciplinary Policy
Student Disciplinary Policy
Equality & Diversity Policy
Safeguarding Policy

External Reference

General Data Protection Regulation (GDPR), UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulation (PECR),

1. POLICY

- 1.1. ICMP collects employee related personal data in order to ensure that ICMP can effectively manage and facilitate efficient transactions with its employees and contractors as well as to comply with relevant employment law.
- 1.2. The Head of HR is the primary handler and administrator of all subject access requests relating to personnel data held by ICMP.
- 1.3. The Employee Records Data Protection Policy does not form part of the formal contract of employment and/or service provision, but it is a condition of engagement that all employees/contractors will abide by it at all times.
- 1.4. ICMP must keep their employees' personal data safe, secure and up to date.
- 1.5. If an employee asks to find out what data is kept on them, ICMP will have 30 days to provide a copy of the information.

2. SCOPE

ICMP is entitled to keep the following data about their employees without their permission:

- name
- address
- date of birth
- sex
- education and qualifications
- work experience
- National Insurance number
- tax code
- emergency contact details
- employment history with the organisation
- employment terms and conditions (e.g. pay, hours of work, holidays, benefits, absence)
- any accidents connected with work
- any training taken
- any disciplinary action

3. PROCEDURE

3.1. *Monitoring*

- 3.1.1. ICMP may from time to time monitor the activities of employees; such monitoring may include, but will not necessarily be limited to, internet and email monitoring.
- 3.1.2. Any employee is hereby informed in advance that they maybe monitored; however, under no circumstances will monitoring interfere with an employee's normal duties.

- 3.1.3. ICMP shall use reasonable endeavours to ensure that there is no intrusion upon employees' personal communications or activities. Equipment provided by ICMP may be monitored.

3.2. *Benefits*

- 3.2.1. In cases where employees are enrolled in benefit schemes that are provided by ICMP (including, but not limited to, pensions, and healthcare) it may be necessary from time to time for third party organisations to collect personal data from relevant employees. Prior to collection, employees will be fully informed of the personal data that is to be collected, the reasons for its collection, and the way(s) in which it will be processed. ICMP shall not use any such data except insofar as is necessary in the administration of relevant benefits schemes.

3.3. *Health Records*

- 3.3.1. ICMP holds health records on all employees in order to assess the health, wellbeing and welfare of employees and highlight any issues which may require further investigation. Such health records include details of sick leave, medical conditions, disabilities, Occupational Health reports and prescribed medication. Data under this heading will be used by management only and will not be revealed to fellow employees and peers (unless those employees are responsible for health records in the normal course of their duties).
- 3.3.2. Employees have the right to request that ICMP does not keep medical records on them. All such requests must be made in writing and addressed to the Head of Human Resources.

3.4. *Employee Records and Retention*

- 3.4.1. Personal data processed for any purpose shall not be kept for longer than is necessary for those purposes (normally six years following the cessation of the working relationship) or as required to comply with legislation.