

People Policies and Procedures

DATA PROTECTION POLICY



Our goal is to have engaged and helpful colleagues who will deliver ever improving customer service.

Manchester Airports Group

Introduction

The Data Protection Act 1998 (DPA) regulates the way in which certain information about employees is held and used. It aims to strike a balance between the needs of employers to hold and process information and the needs of individuals to have information about them kept private.

Manchester Airports Group processes information in line with the Act's key principles which are summarised below:

1. Personal data must be processed fairly and lawfully;
2. Personal data must be obtained only for specified and lawful purposes and must not be further processed in any manner incompatible with those purposes;
3. Personal data must be adequate, relevant and not excessive in relation to the purpose(s) for which it is processed;
4. Personal data must be accurate and, where necessary, kept up to date;
5. Personal data must not be kept for longer than is necessary for the purpose(s) for which they were obtained;
6. Personal data must be processed in accordance with the rights of data subjects (i.e. individuals who are the subject of personal data). These are the employee's right to (a) request access to his personal data, (b) prevent processing likely to cause damage or distress, (c) prevent processing for direct marketing and (d) object to certain decisions being taken by automated means (i.e. without human intervention).
7. Appropriate technical and organisational measures must be taken against unauthorised or unlawful processing of personal data and against accidental loss, destruction of, or damage to, personal data.
8. Personal data must not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Scope

This policy applies to all employees within the Manchester Airports Group of companies and to any agency/contract staff who have access to employee data within HR or who manage MAG employees. References to the masculine are solely for convenience and are understood to include the feminine.

Responsibilities

Each function in which data is processed will provide guidance on the standards required in respect of data processing; this is the responsibility of the function director. The use of the majority of employee data is covered within the Colleague Data Guide (HR). The approved methods of technology for protection of corporate data are covered within the IS Data Handling Procedures Guide (IS).

All colleagues must comply with the DPA in relation to information about other colleagues. Failure to do so e.g. unauthorised, inappropriate or excessive disclosure of or obtaining information about individuals will be regarded as serious misconduct and managed within the Company Disciplinary Procedure(s). Colleagues dealing with personal information will be given separate guidance on their obligations, and must ask if they are unsure of them.

MAG's Data Protection registrations and comprehensive guidance on the DPA can be found on the website of the Information Commissioner's Office.

Overall responsibility for compliance with the DPA rests with John Hampton, Head of Group Reward and Employment Policy.