

## DATA PROTECTION AND SECURITY POLICY

Power Lines, Pipes and Cables Ltd (PLPC Ltd) is a family run business that was established in 1973 to provide a power line construction service to Transmission and Distribution Network Operators (TNOs and DNOs) across the UK. PLPC Ltd supply and install overhead power lines and fibre optic systems to TNOs and DNOs and private clients. The skills and experience held by staff enable the company to take a flexible approach that allows them to meet increasing customer demands and succeed in a challenging economic climate.

The purpose of this policy is to ensure that all personal information handled within the company is processed accordingly, to legally compliant standards of data protection and data security. PLPC recognise the importance to notify it's staff of the types of information held and how it is used, ensuring staff understand our rules and legal standards for handling personal information relating to staff and others and also to clarify the responsibilities and duties of staff with this.

This policy and arrangements apply to all PLPC employees, consultants, contractors, casual / agency staff, volunteers and interested parties / stakeholders, who access or generate any information from our sites, offices or customers.

### **Personal information and activities generated by the company include:**

- Those which relate to an individual who can be identified either from isolated information or by reading it together with other information held
- Information stored electronically or on paper in a filing system
- Information in the form of statements of opinion as well as facts
- Information which relates to staff (present, past or future) or to any other individual whose personal information we handle or control
- Information obtained, held or stored, organised, disclosed or transferred, amended, retrieved, used, handled, processed, transported or destroyed

### **Personal information processed includes:**

- Information provided by employees, before or during employment
- Information by third parties, such as references, supplier / contractor information, customers, landowners or other interested parties
- Information available in the public domain

### **Personal information collected, stored and used relating to employees include:**

- Home address and contact details (including personal emails, mobile, home numbers)
- Next of kin contact details
- Recruitment (including application forms / CV, references received and qualification details)
- All pay records, national insurance number, tax details and any employment benefits such as pension
- Attendance records (including absence, sickness, non approved days taken, along with any health/medical information provided)
- Religious or philosophical beliefs (including specific dietary or holiday requirements)
- Sexual orientation, where this is disclosed to us (eg through providing details of your spouse or partner for the administration of benefits)

- Gender, where this is disclosed. May be used anonymously for eg national statistics
- Risk assessments eg pregnancy, colour vision testing
- Logs and registers relating to work activities eg accident and training registers, minutes
- Performance reviews, training records and any disciplinary matters, grievances, complaints, non compliances or concerns in which employees are involved in.
- Supplier and contractor contact information eg pay records, tax / cis information, performance records, cv's/references,
- Complaints and satisfaction recorded from interested parties

**Authorised personnel will use information to carry out regular business activities, to administer employment or engage employees and to deal with any problems or concerns arising with staff, including:**

- **Staff Address Lists:** to compile and circulate lists of home addresses and contact details, to contact employees outside working hours (eg for faults, working away from home or emergency enquiries)
- **Sickness Records:** to maintain a record of your sickness absence and copies of any doctors notes or other documents supplied to us in connection with your health, to inform your colleagues and others that you are absent through your sickness, as reasonably necessary to manage your absence, to deal with unacceptably high or suspicious sickness absence, to inform reviewers for appraisal purposes of your sickness absence level, to publish internally aggregated, anonymous details of sickness absence levels.
- **IT systems:** monitor use of e-mails, internet, telephone, mobiles, computer or other communications or IT resources
- **Vehicle records:** to monitor safe usage, location of vehicles/plant for security of vehicles and in relation to work
- **Disciplinary, grievance or legal matters:** in connection with any regulatory or compliance matters or proceedings that may involve you.
- **Performance Reviews;** to monitor competency, performance and training requirements

The employer is a data controller of the personal information in connection with staff employment. This means that PLPC determine the purposes for which, and the manner in which, your personal information is processed. Information will only be processed for the purpose for which they were originally collected. Systems are in place to ensure data is only maintained for a limited period of time, with data subjects having the right to access or request, where appropriate, for information to be deleted at any time.

If an employee considers any information held about them is inaccurate, they should notify a manager or the Data Protection Officer and, where it is agreed that the information is inaccurate, then it will be corrected. If the company does not agree with the correction, staff comments will be noted.

The company will take measures to ensure that personal information is kept secure, as described in this policy, processed lawfully, fairly and in a transparent manner in relation to the data subject. Your personal information will be collected for specified and legitimate purposes with consent requested. This will not be disclosed to others outside the employer, with the exception of for working requirements such as:

- The administration of employment and associated benefits e.g. to the providers of pension or insurance schemes
- To comply with legal obligations or assist in a criminal investigation or to seek legal or professional advice in relation to employment issues, which may involve disclosure to lawyers,



accountants or auditors and to legal and regulatory authorities, such as HM Revenue and Customs

- To customers as part of working requirements
- To other parties which provide products or services to us

Where suitable the company aim to anonymisation or pseudonymisation to personal data. With document protected and limited to access by essential staff only

By providing personal information to the company, staff are consenting to the use of personal information (including any sensitive personal data) in accordance with this policy.

These areas will be achieved through the implementation of and adherence to a framework of objectives, procedures and processes that comply with requirements of the Data Protection Act 2018, UK GDPR and associated industry codes, customer, statutory and regulatory requirements.

The Managing Director is responsible for establishing, communicating, reviewing, and implementing this policy and the supporting management system within PLPC Ltd. The **Data Protection Controller** has day to day responsibility for Data Processing and Data Security and developing compliance requirements. All staff and interested parties have a personal responsibility to ensure compliance with this policy, to handle all personal information consistently with the principles set out here and within the management system, to ensure that measures are taken to protect data security. Managers have responsibility for leading by example and monitoring and enforcing compliance.

Any breach of this policy will be taken seriously and may result in disciplinary action. This policy will be displayed at our Carlisle office and on the company website, with distribution to customers, suppliers or any person, group or organisation on request. Copies of personal information held is also available on request.

Signed:



**Dale Harrison**  
**Managing Director**

**Last Reviewed:** March 2024  
**Next Review Date:** March 2025

