

# Ecoserv Group Data Protection Policy

## Aims of this Policy

- To inform employees about data protection principles.
- To inform employees about the types of information held and the purpose of this.

## Policy Apply to?

This policy is applicable to all employees.

## Essential Elements

The Company complies with the Data Protection Act 1988 (DPA) and its successor the General Data Protection Regulation (GDPR) from the 25 May 2018 which regulates how organisations hold and store information. This policy gives some useful information about the type of information that we keep, and the purpose of this.

These records may include:

- Information gathered about an employee and any references obtained.
- Details of terms of employment.
- Payroll, tax, and National Insurance information.
- Performance information.
- Details of job duties.
- Health records.
- Absence records including holiday records and self-certification.
- Details of any disciplinary investigations and proceedings.
- Training records.
- Contact names and addresses (and related contact information).
- Correspondence with Ecoserv and other information provided to Ecoserv by other organisations.

This information will be held and used under the auspices of contractual necessity (e.g. for the processing of employee payment data), or a legal obligation (e.g. for the processing of employee data in relation to social security), or the legitimate interest of the employer (e.g. in the context of employee monitoring). From time to time, we may need to disclose some information we hold about our employees to relevant third parties (e.g. requested to do so by an employee for the purposes of giving a reference, to the Job Centre when a claim for benefits is made, etc.).

It should be noted that Ecoserv may hold the following information about an employee for which disclosure to any person will be made only when strictly necessary for the purposes set out below:

- An employee's health, for the purpose of compliance with our health and safety and our occupational health obligations.
- For the purposes of personnel management and administration, for example to consider how an employee's health affects their ability to do their job, and, if the employee is disabled, whether they require any reasonable adjustment to be made to assist them at work.

- The administration of insurance, pension, sick pay, and other related benefits.
- In connection with unspent convictions - to enable us to assess an employee's suitability for employment.

The Company requires all employees to comply with the DPA and the GDPR in relation to information about other staff and clients. Failure to do so, e.g., unauthorised, inappropriate, or excessive disclosure of or obtaining information about individuals, will be regarded as gross misconduct, and dealt with in accordance with the Company's disciplinary policy. More information can be found on the Information Commissioner's Office website: <http://www.ico.gov.uk/>.

## Whistle Blowing

Whistle Blowing is where an employee raises concerns about underhand or illegal practices within their organisation or an associated organisation. Our policy is to operate within the laws and regulations of this country, and all employees are expected to co-operate with this.

We will offer protection to any employee who honestly and reasonably believes that underhand or illegal practices are taking place, including the prevention of retaliation against good faith whistle blowers as prescribed by the Public Interest Disclosure Act 1988 which provides such workers protection against victimisation or dismissal.

The aim is that the career of any employee should not in any way be harmed or hindered because of their disclosure (whether the item reported proves to be true or not, provided the reporting was carried out in good faith).

We would expect all employees to report any of the following: a criminal offence, a failure to comply with a legal obligation, the endangering of an individual's health and safety, damage to the environment, deliberate concealment of information relating to any of these areas.

An employee is encouraged to make a disclosure immediately to a director. When disclosing any concerns, the employee will not be expected to have absolute proof of malpractice but will need to be able to show the reason for their concern.

Any deliberately false or malicious allegations will be taken very seriously, and appropriate disciplinary action will be taken. If an employee has a concern and is unsure whether this is the appropriate procedure for raising it or is unhappy about the outcome of an investigation, they can contact the independent charity, Public Concern at Work [www.pcaaw.co.uk](http://www.pcaaw.co.uk) on 0207 404 6609 for independent advice or contact our HR advisors.

A handwritten signature in black ink, appearing to be "Jean-Henri Beukes".

Jean-Henri Beukes  
Chief Executive Officer  
20th February 2022