

DATA PROTECTION POLICY AND SITE WORKER PRIVACY NOTICE

POLICY — COMPANY FILE

The policy, the record of what the site forms collect, and the notice for workers

KD-PQ-DP-006 Rev A0

UK GDPR Article 5 sets the principles — lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality — and makes the controller responsible for, and able to demonstrate, meeting them. A contractor is the controller of the personal data its site forms, registers and assessments collect: sign-in and visitor records, inductions and briefings, cards and authorisations, fit-to-work declarations and emergency contacts, accident and investigation records, health surveillance, exposure records and tests, pregnancy and young person assessments, working time and leave, right to work and CIS records, photographs and CCTV, and the concerns people report. Health information is special category data (Article 9): using it needs a lawful basis under Article 6 and a condition under Article 9 — for employment obligations, Data Protection Act 2018 s.10 and Schedule 1 Part 1 paragraph 1, which also requires the appropriate policy document in section 6. Articles 13 and 14 list what people must be told when their data is collected from them or obtained from someone else; the privacy notice on the last page is written to those lists. The law applies across the UK.

1 THE BUSINESS

BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	POLICY DATE	YOUR REV
REGISTERED / TRADING ADDRESS		DATA PROTECTION LEAD		REVIEW BY
DATA PROTECTION FEE — ICO REFERENCE AND RENEWAL	DATA PROTECTION OFFICER		APPROPRIATE POLICY DOCUMENT	

2 POLICY

This business collects only the personal data it needs to run safe sites, employ people and meet the law; tells people what it collects and why; keeps it secure; keeps it no longer than it needs to; and answers people who ask about it. In particular:

- 1 Every form, register or file that holds personal data has a stated purpose and a lawful basis, recorded in section 3 before it is used.
 - 2 Health information — fit-to-work declarations, health surveillance, exposure records, drug and alcohol results, pregnancy assessments, accident injuries — is seen only by the people who need it, and held apart from the general site file.
 - 3 Nothing personal is displayed on a site board beyond what the board is for (first-aiders' names, emergency contacts for the site).
 - 4 At demobilisation paper records are boxed, indexed and taken to secure storage (KD-SITE-DM-034), with health forms sealed separately; each record is destroyed securely when its retention period ends — never before a legal minimum shown in section 3.
 - 5 A lost folder, a stolen laptop or an email to the wrong person is reported to the data protection lead the same day.
- COMMITMENTS NOT ADOPTED — NUMBER AND REASON

3 THE RECORD OF PROCESSING — SITE RECORDS FIRST, THEN EVERYTHING ELSE THIS BUSINESS HOLDS

Article 30 requires a written record of all the controller's processing: the purposes, the categories of people and of data, the recipients, any transfer outside the UK with its safeguards, where possible the time limits for erasure, and a general description of the security measures. An organisation employing fewer than 250 people is excused only where its processing is occasional, unlikely to result in a risk, and includes no special category data — a contractor collecting health declarations every week does not meet that. For special category data processed under a Schedule 1 condition the record also shows the condition relied on, how Article 6 is met, and whether the retention policy was followed (Data Protection Act 2018 Schedule 1 paragraph 41). Legal minimum retention periods are printed in the rows; the business's own period is never shorter. Add everything else the business holds on the blank lines.

RECORD AND THE DATA IT HOLDS	PURPOSE	LAWFUL BASIS	RECIPIENTS	OUTSIDE UK	KEPT FOR	SECURITY
Sign-in, visitor and key records KD-SITE-SI-001, KD-SITE-VR-002, KD-SITE-KA-020 — name, company, times on site, vehicle registration, key holders						
Induction and briefing records KD-CDM-IN-009, KD-SITE-IR-003, KD-SITE-RB-008 — name, employer, trade, card type and number, emergency contact, signatures						
Training, competence and authorisations KD-SITE-TC-004, KD-PLT-OA-011, KD-SYS-AA-019 — card and ticket numbers, expiry dates, copies, appointments						
New starters and young persons KD-SITE-NS-006, KD-HR-YP-005 — age, experience, language, return after injury, restrictions on the work						
Fit-to-work and emergency contact KD-SITE-FW-005 — date of birth; health conditions, medication, allergies and work restrictions (special category); next of kin. The sheet itself is destroyed when the person leaves the project unless it forms part of an accident record						

Concerns, reports and equality monitoring
KD-PQ-ED-003, KD-PQ-MS-004, KD-PQ-AB-005 and its
shifts register — concerns and reports, which may include
special category data; equality monitoring data (special
category), held apart

SECURITY — PAPER, DEVICES AND EMAIL

SHARING AND CCTV

KD-PO-DP-006 | Rev A0 | Issued 2026-09-12 | Effective 2026-09-12 | Next review 2027-09-12

People may ask for a copy of their personal data (Article 15), and for it to be corrected or erased, its use restricted, or object to its use, subject to the conditions in the law. Answer within the applicable time period in UK GDPR Article 12A, inserted by the Data (Use and Access) Act 2025: one month from the latest of receiving the request, receiving any identification asked for, and receiving any fee charged — extendable by two further months for complex or numerous requests, but only by a notice giving the reasons within that first month. Answers are free of charge unless the request is manifestly unfounded or excessive (Article 12). A person may also complain to the business: Data Protection Act 2018 s.164A requires the controller to make complaints easy to make — for example with a complaint form — to acknowledge each within 30 days, to respond without undue delay and to tell the complainant the outcome. A personal data breach is notified to the Information Commissioner without undue delay and, where feasible, within 72 hours of becoming aware of it, unless it is unlikely to result in a risk to people (Article 33); where it is likely to result in a high risk to people's rights and freedoms, the people affected are also told without undue delay (Article 34). Every breach is documented, whether notified or not.

DATE	TYPE	WHO AND WHAT	DUE BY	ACTION TAKEN	WHO TOLD	CLOSED

6 THIS POLICY AS THE APPROPRIATE POLICY DOCUMENT

Where health or other special category data is processed under a condition in Data Protection Act 2018 Schedule 1 that needs one — such as the employment condition in paragraph 1 — the business must have an appropriate policy document: one that explains its procedures for meeting the Article 5 principles for that data, and its policies on retention and erasure with an indication of how long the data is likely to be kept (paragraph 39). This policy is written to be that document: sections 2 and 4 are the procedures and section 3 the retention. It is kept for as long as the processing continues and for six months after it stops, revised when needed, and given to the Information Commissioner free of charge on request (paragraph 40).

SCHEDULE 1 CONDITIONS RELIED ON

SECTION 3 AND THIS SECTION LAST CHECKED

7 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

8 SIGNED FOR THE BUSINESS

I adopt this data protection policy for the business named in section 1, and I will make sure it is resourced, briefed and kept current.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	REVIEW BY

DATA PROTECTION POLICY AND SITE WORKER PRIVACY NOTICE

Site worker privacy notice — give it at induction and display it in the site office

NOTICE — ISSUE AT INDUCTION

KD-PQ-DP-006 Rev A0

N1 PRIVACY NOTICE FOR PEOPLE WORKING ON OR VISITING OUR SITES

This notice tells you what personal information we hold about you, why, where it comes from, and what you can do about it. It is written to UK GDPR Articles 13 and 14.

WHO WE ARE

CONTACT ABOUT YOUR DATA

DATA PROTECTION OFFICER

N2 WHAT WE HOLD, WHY, THE LAWFUL BASIS, AND HOW LONG WE KEEP IT

WHAT WE HOLD AND WHY	LAWFUL BASIS WE RELY ON	HOW LONG WE KEEP IT
Signing in and out, visitor details and keys so we know who is on site in an emergency and can keep unauthorised people out		
Induction, briefings, cards, tickets and authorisations so only competent, briefed people do the work — with your card numbers and emergency contact		
New starter and young person checks to decide what extra supervision or limits you need		
Fit-to-work declaration your date of birth, and any health condition, medication, allergy or work restriction you choose to tell us — to help you in an emergency		
Accidents, incidents, investigations and observations to look after you, find out what happened, and report to HSE where the law requires		
Occupational health, exposure records, face-fit and drug and alcohol tests only where your work requires them — some health records must be kept for 40 years		
New or expectant mother assessment once you tell us — to remove or control the risks to you and your baby		
Working time, leave and workstation assessments (our employees) to pay you correctly and meet the working time and display screen rules		
Right to work checks (our employees) because the law requires us to check before employment		
CIS verification, payments and deductions (self-employed subcontractors) because HMRC requires us to verify you and record what we paid and deducted		
Photographs and CCTV (where used) to keep the site secure and to record the work		
Concerns and reports you raise, and equality monitoring to deal with the concern; monitoring data only if you choose to give it		

WHO WE SHARE IT WITH

SENT OUTSIDE THE UK?

WHERE WE GET IT FROM, IF NOT FROM YOU

N3 YOUR RIGHTS

You can ask us for a copy of your personal information, and ask us to correct it, erase it, restrict how we use it, or stop using it, and in some cases to give it to you in a form you can take elsewhere — the law sets conditions on each. We reply within one month of receiving your request (or the proof of identity we ask for); for a complex request we can extend that by two months, and if we do we tell you why within the first month. Where we rely on your consent, you can withdraw it at any time; that does not affect what we did before. You can complain to us, using the contact above, and you can complain to the Information Commissioner's Office.

Signing in, the site induction and your training cards are a condition of working on this site: without them we cannot let you work. The fit-to-work declaration and emergency contact help us keep you safe; tell the site manager if there is anything you would rather not write down.

AUTOMATED DECISIONS ABOUT YOU

NOTICE VERSION AND DATE

SITE

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-12	first-issue	First issue.	— not yet approved —
A0	2026-09-12	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.