



Highlands and Islands Transport Partnership

Data Protection Policy

Introduction

This is a statement of the Data Protection Policy adopted by HITRANS, the Highlands and Islands Transport Partnership.

This policy is applicable to all personal data held by HITRANS. It applies to all Members, Observers and employees of HITRANS and to any contractors or agents performing work for or on behalf of HITRANS.

HITRANS is a partnership of Argyll and Bute Council, Comhairle nan Eilean Siar, Highland Council, Moray Council and Orkney Islands Council. HITRANS is responsible to Scottish Ministers for the formulation and delivery of a Regional Transport Strategy for the region bounded by Argyll and Bute Council (except Helensburgh and Lomond) and the other four partner councils.

In order to operate, HITRANS needs to process certain types of data about people with whom it deals. This includes current, past and prospective members, observers, employees, suppliers, contractors, agents, stakeholders, users, customers, and others with whom HITRANS interacts.

In order to comply with the Data Protection Act 1998, all personal data is dealt with properly, however it is collected, recorded and used. Safeguards are in place to observe the requirements of the Act, these are set out in more detail in the following paragraphs.

HITRANS regards the safe-keeping of all personal data as paramount to maintaining confidence between itself and those with whom it deals. HITRANS endeavours to fulfil all the requirements of the Act while remaining open and accessible by the public.

The Data Protection Principles

HITRANS fully endorses and adheres to the eight Data Protection Principles which are set out in the Data Protection Act 1998 and can be summarised as follows:

- Data must be fairly and lawfully processed
- Data must be processed for limited purposes
- Data must be adequate, relevant and not excessive
- Data must be accurate and up to date
- Data must be not kept longer than necessary
- Data must be processed in accordance with the individual's rights
- Data must be secure
- Data must not be transferred to countries outside the European Economic area unless that country has adequate protection for the individual

What HITRANS will do

HITRANS will, through appropriate management and strict application of criteria and controls:

- fully observe conditions regarding the fair collection and use of data;
- meet its legal obligations to specify the purposes for which data is used;
- collect and process appropriate data only to the extent that it is required to fulfill operational needs or to comply with any legal requirements;
- ensure the quality of the data used;
- apply strict checks to determine the length of time the data is held;
- ensure that rights of people about whom data is held can be fully exercised under the Act. These rights include:
 - the right to be informed that processing is being undertaken;
 - the right of access to a person's own personal data;
 - the right to prevent processing in certain circumstances; and
 - the right to correct, rectify, block or erase data which is regarded as wrong data;
- take appropriate technical and organisational security measures to safeguard personal data;
- ensure that personal data is not transferred outside the European Economic area without suitable safeguards.

In addition HITRANS will ensure that:

- there is someone with specific responsibility for data protection in the organisation;
- everyone managing and handling personal data understands that they are contractually responsible for following good data protection practice;

- everyone managing and handling personal data is appropriately trained to do so;
- everyone managing and handling personal data is appropriately supervised;
- anyone wishing to make enquiries about handling personal data knows what to do;
- queries about handling personal data are competently and courteously dealt with;
- methods of handling personal data are clearly described;
- a regular review and audit is made of the way personal data is managed;
- methods of handling personal data are regularly accessed and evaluated;
- performance with handling personal data is regularly accessed and evaluated.

Detailed Policies

This statement sets out HITRANS's primary general policy with regard to Data Protection. As and when appropriate or required, HITRANS will also develop more detailed policies, codes of practice, protocols and guidance for specific types of data and their collection, maintenance and protection.

Further Information

For further information about HITRANS or about this Data Protection Policy, please contact:

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