

Employee Privacy Notice

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1.0 Purpose and Legal Basis

This privacy notice is a key part of our commitment to building a transparent and trusting relationship with the dedicated individuals who carry out our work. Our ability to fulfil our constitutional objects is built on a foundation of trust. This privacy notice is a cornerstone of that trust, demonstrating our commitment to protecting the personal data of the people who carry out this vital work.

This notice is designed to ensure the charity's full compliance with its obligations under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

This document outlines the scope of its application to all individuals engaged in work for the charity.

2.0 Scope

This notice defines who is covered by its terms, ensuring a comprehensive and consistent approach to data protection across the organisation. While the primary audience is employees, its scope is designed to cover the full employment lifecycle, from initial application to post-employment record-keeping.

This notice applies to the following individuals:

- Current and former employees
- Job applicants
- Agency staff
- Volunteers
- Contractors and consultants

Our core commitment is to protect the personal data of everyone who helps us deliver our vital work, a principle that is expanded upon in our Policy Statement.

3.0 Policy Statement

As part of a renewed commitment to the highest standards of governance, the Board of Trustees has established this policy to underscore the charity's fundamental duty to protect staff data. Our ability to effectively support the Beneficiary Community depends on a foundation of trust, integrity, and lawful conduct in all our operations. This begins with how we manage our internal affairs and care for our people.

The Board of Trustees of the charity are committed to processing all employee, volunteer, and contractor data lawfully, fairly, and in a transparent manner. We will ensure that personal data is collected only for specified, explicit, and legitimate purposes directly related to the employment relationship and will not be processed in any manner that is incompatible with those purposes. All data will be handled securely and with the utmost respect for individual privacy.

To ensure this commitment is understood and applied consistently, it is important to clarify the key terms used throughout this notice.

4.0 Definitions

This section provides clear, accessible definitions of key data protection terms as they apply within the context of the charity's operations.

- **Personal Data:** Any information that can be used to identify a living person. This includes obvious information like a name and address, as well as identifiers like an employee number or National Insurance number.
- **Special Category Data** This is a specific type of personal data, such as information about health, racial origin, or trade union membership, which UK GDPR deems so sensitive that its processing is legally prohibited *unless* a specific, lawful condition is met. It therefore requires the highest level of protection.
- **Processing:** Any action or set of actions performed on personal data. This includes collecting, recording, storing, viewing, sharing, or deleting data.

- **Data Controller:** The organisation that determines the purposes and means of processing personal data. For the purposes of this notice, the Data Controller is the charity trustee board.
- **Data Subject:** The individual to whom the personal data relates (e.g., an employee, volunteer, or job applicant).
- **Beneficiary Data:** This refers to the personal and often highly sensitive data relating to the individuals we support within the Beneficiary Community. As part of their duties, employees may be required to process this data, which is subject to the highest standards of confidentiality and security.

These definitions provide a foundation for understanding the practical procedures for how we manage your data.

5.0 Our Data Processing Procedures

This section provides a transparent overview of what personal data the charity collects, why it is needed, and how it is managed throughout your relationship with us, from recruitment and employment through to the post-employment period.

What Personal Data We Collect

We process various categories of personal data to manage the employment relationship effectively. These include:

- **Recruitment Data:** CVs, application forms, cover letters, interview notes, and references.
- **Identity & Contact Data:** Your full name, address, contact details, date of birth, next of kin, and documentation confirming your right to work in the UK.
- **Contractual & Financial Data:** Your employment contract, bank account details for salary payments, National Insurance number, tax information, pension details, and salary and benefits information.
- **Performance & Administrative Data:** Records of performance reviews, appraisals, training and development, and information relating to any disciplinary or grievance procedures.
- **Special Category Data:** Health and medical information required to manage sick pay, make reasonable adjustments, or for health and safety purposes. We may also process data on ethnicity, religion, or sexual orientation for equality monitoring purposes, where you choose to provide it.

Our Lawful Basis for Processing Your Data

Under UK GDPR, we must have a valid legal reason for processing your personal data. The table below outlines our main processing activities and the lawful basis we rely on for each.

Processing Activity	Lawful Basis
Administering employment contracts, payroll, and pensions.	Necessary for the performance of a contract .
Complying with legal obligations like tax, social security, and statutory sick pay.	Necessary for compliance with a legal obligation .
Conducting safeguarding checks (e.g., DBS checks) where required.	Necessary for compliance with a legal obligation and substantial public interest.
Managing performance, disciplinary, or grievance procedures.	Necessary for our legitimate interests (to manage our workforce effectively).
Processing health data for reasonable adjustments or sick pay.	Necessary for carrying out obligations in the field of employment law; requires an additional condition for Special Category Data .
Monitoring equality and diversity.	Explicit consent or substantial public interest.

Data Sharing and Third Parties

To deliver our administrative and legal duties, we may need to share your personal data with trusted third-party organisations. These can include:

- Payroll providers
- Pension scheme administrators
- HM Revenue & Customs (HMRC) and other government bodies
- Legal and professional advisors

The charity has established a robust due diligence process to ensure all third-party processors provide sufficient guarantees that they meet UK GDPR standards. We share

only the data necessary for the specified purpose and have legally binding agreements in place to protect your information.

Data Security and Retention

The charity has implemented appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. Detailed information on these measures is available in our separate **Information Security Policy**.

We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Specific retention periods for different types of documents and data are defined in our **Document Retention & Archiving Policy**.

Your Data Protection Rights

Under UK data protection law, you have specific rights over your personal data. These are:

1. **The right to be informed:** You have the right to be provided with clear, transparent, and easily understandable information about how we use your information.
2. **The right of access:** You have the right to obtain a copy of your personal data, as well as other supplementary information.
3. **The right to rectification:** You have the right to have inaccurate personal data corrected or completed if it is incomplete.
4. **The right to erasure:** Also known as 'the right to be forgotten', this enables you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it.
5. **The right to restrict processing:** You have the right to 'block' or suppress further use of your information in certain circumstances.
6. **The right to data portability:** You have the right to obtain and reuse your personal data for your own purposes across different services.
7. **The right to object:** You have the right to object to certain types of processing, such as direct marketing.
8. **Rights in relation to automated decision making and profiling:** You have rights where decisions are made about you by automated means without any human involvement.

Upholding these procedures and rights is a collective responsibility, detailed in the following section.

6.0 Roles and Responsibilities

Effective data protection is a shared responsibility that requires clear accountability across the charity. As part of our renewed commitment to governance, this section clarifies the

specific duties of different roles to ensure compliance with this notice and broader data protection law.

- **The Board of Trustees:** The Board of Trustees holds ultimate responsibility for the charity's compliance with data protection law. Its duties include formally approving this notice and all related data protection policies, ensuring adequate resources are allocated for effective data management, and fostering a culture of privacy and security throughout the organisation.
- **The Data Protection Officer (DPO):** Acts as the primary point of contact for all data protection matters. The DPO's duties include monitoring the charity's compliance with UK GDPR, providing advice and guidance, and acting as the contact for data subjects and the Information Commissioner's Office (ICO). To ensure full compliance with UK GDPR and in line with governance best practice, the DPO is an ordinary Trustee appointed in a manner that guarantees their independence. The Board has established measures to mitigate any potential for conflicts of interest, allowing the DPO to provide impartial advice and oversight.
- **All Employees, Volunteers, and Contractors:** Everyone who handles personal data on behalf of the charity is responsible for doing so in line with this notice and the charity's other data protection policies. This includes completing any required training, reporting data breaches promptly, and handling data securely.

This framework of responsibility is supported by clear procedures for how you can exercise your rights.

7.0 How to Exercise Your Rights and Raise Concerns

This section provides the practical steps you can take to exercise your data protection rights, ask questions, or raise a concern if you are unhappy with how the charity is handling your personal data.

First, any requests to exercise your data subject rights (such as a request to access your data) should be made in writing to the Data Protection Officer (DPO). You can contact the DPO through the charity office contact details.

Second, if you have a concern or complaint, we encourage you to raise it with the DPO in the first instance so that we can try to resolve the issue. For more detailed information, please refer to our separate **Data Protection Complaints Policy**.

Third, if you are not satisfied with our response or believe we are not processing your data in accordance with the law, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, which is the UK's independent data protection regulator.

This notice itself is a living document, subject to regular review to ensure it remains effective and compliant.

8.0 Updates to this Notice

Data protection law and best practice are constantly evolving. To ensure this notice remains accurate, compliant, and fit for purpose, it will be subject to regular review.

This notice is a formal governance document owned by the Board of Trustees. It will be reviewed at least annually, or more frequently should there be significant changes to legislation or our processing activities, to ensure its ongoing accuracy and effectiveness.

Employees will be notified of any significant updates to this privacy notice.

9.0 Related Policies

Following a formal governance review, the Board has developed a comprehensive suite of interconnected policies to ensure our data handling practices are robust, transparent, and fully compliant with UK law. This notice should be read in conjunction with the following key documents:

- Data Protection Policy
- Information Security Policy
- Subject Access Request (SAR) Policy
- Data Breach Notification Policy
- Document Retention & Archiving Policy
- Conflict of Interest Policy