



Privacy Notice for Staff employed by Bethphage & volunteers

Your Privacy

Your privacy matters to us and we are committed to the highest data privacy standards, confidentiality and adherence with UK GDPR Data and the Protection Act 2018.

To disclose this to you, our Privacy Notice includes the following:

- What data we collect from you.
- How and why we process it.
- Who we share it with and why.

We adopt the core principles of data protection legislation which are defined within the Data Protection policy to which you will be provided access.

Bethphage is registered with the Information Commissioners Office (ICO) Registration No.: Z5087841

Collection of your Personal Data

We collect your personal information via

- disclosure directly from you
- From employment agencies
- From referees
- From pension administrators and other government departments. For example, tax details from HMRC

Categories and Type of Personal Data Collected and processed.

We may use the following information to carry out the contract or agreement we have with you, provide you with access to business services required for your role and manage our human resources processes:

- Personal contact details, including name, address, telephone number(s), personal email addresses
- Date of Birth, gender and NI number
- Emergency contact / Next of Kin and their contact information
- Employment and education history, including qualifications, job application, references, right to work information and details of any criminal convictions that you declare, or we are informed about through checks with relevant agencies.
- Location of employment
- Information relating to salary and pension including sick leave, bank details, payroll records, NI Number and tax status.
- Performance records including disciplinary records

- Medical, Health and wellbeing information declared by you and accident records
- Equality & Diversity information
- Photos
- CCTV images (at applicable sites)

We treat all personal data as sensitive but acknowledge that we also process special category data, which requires particular protection.

Sharing of Personal Data

Access to your personal data by internal staff, is strictly controlled and restricted to only those few that need such access.

In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies and external auditors. For example, we may share information about you with HMRC for the purpose of collecting tax and national insurance contributions or external CQC auditors.

During our contract or agreement with you, we may share your data with other companies who are critical for the provision of our engagement with you or supply other services to us. These companies will be viewed as Data Processors.

We may share your personal data with third parties located outside of the EEA and in countries that do not have Data Protection law which provides the equivalent protection to individuals rights as the UK. In these situations, we will ensure that we have in place appropriate safeguards with these third parties to protect your personal data.

Securing and Processing of your Personal Data

The personal data that we process is stored within our own internal IT systems, Offices and those of contracted electronic storage providers.

We have assessed the risks of the processing and storage of your personal data, to ensure we have implemented appropriate technical measures to protect it. You can find details of these in our GDPR Policy.

We have also implemented appropriate data protection policies and procedures to ensure all staff maintain the confidentiality of your data.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we have a duty to inform you immediately. If the loss or unauthorised access of your data has potential to cause you harm, we will also report this to the Information Commissioners Office, who are responsible for regulating data protection legislation in the UK.

<https://ico.org.uk/>

Our legal basis for processing your personal data?

Depending on the processing activity, we rely on the following lawful basis for processing data under UK GDPR:

- Article 6(1)(a) consent
- Article 6(1)(b) contract
- Article 6(1)(c) legal obligation
- Article 6(1)(d) vital interests
- Article 6(1)(e) public task
- Article 6(1)(f) legitimate interests

As all of our processing activities are crucial to the provision of the employment contract or volunteering agreement which we enter into, we process your data mainly based on that contractual relationship.

We may also process your data under our legitimate interests as the processing activities are essential in managing employment or volunteering roles and ensuring safe working environments.

We may at times also seek your consent to collect and process your personal data, such as for photographs or the collection of equality and diversity data.

Where special category of data is processed, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise or defense of legal claims.

How long do we keep your personal data for?

We will retain your data for the duration of the relationship between us and to meet our statutory obligations. A typical retention period for staff data would be 6 Years following our last engagement with you. We may however retain some data for longer if circumstances mean it would be in ours and your interest to do so.

You can find details of our intended retention in our Archiving Policy.

Your rights in relation to personal data

Under UK GDPR, you have the following rights:

- The right to be informed
- The right of access, commonly referred to as subject access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights related to automated decision-making including profiling

You can exercise your rights or make any other privacy related enquiries by contacting- dataprotection@bethphage.co.uk

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

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