



## Privacy Notice (Employees, Volunteers, Contractors and Associates)



# BETHEL HEALTH AND HEALING NETWORK



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## 1. Privacy Statement (Fair Processing Notice)

Bethel Health and Healing Network is committed to safeguarding the privacy and security of the personal information of our employees, volunteers, workers, contractors and associates.

This statement describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

We are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy statement.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## 2. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. used lawfully, fairly and in a transparent way;
2. collected only for specified, explicit and legitimate purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. adequate and relevant to the purposes we have told you about and limited only to those purposes;
4. accurate and where necessary kept up to date;
5. kept only as long as necessary for the purposes we have told you about; and
6. kept securely.

## 3. Data Subject Information

As an employee, volunteer, contractor or associate of Bethel Health and Healing Network we will collect, hold, store and use the following information that is personal and sensitive about you:

- Name
- Postal address
- Telephone numbers – landline and mobile
- Next of kin – name, address and telephone numbers
- Personal e-mail address
- National Insurance Number
- Evidence of right to work in UK
- Bank account details, payroll records and tax status information
- Employment records:





- Statement of terms and conditions of employment, including start date and location of workplace
- Salary, annual leave, pension and benefits
- Contract change notification letters or e-mails
- Notes, evidence and letters pertaining to disciplinary action
- Notes, evidence and letters pertaining to grievances
- Performance information
- Salary and benefit history
- Recruitment information (including copies of right to work documentation, application forms, profile forms, references and information included in a CV or as part of the application process)
- CCTV footage and other information obtained through electronic means such as swipe cards
- Information about your use of our information and communication systems
- Photographs on our website and/or security passes
- Videos on website and for marketing purposes
- We may also collect, hold, store and use sensitive information such as the following:
  - State of your health, via medical questionnaire, self-certification forms, GP Statement of Fitness, return to work forms
  - Disability
  - Ethnicity, nationality, gender, age and sexual orientation
  - Trade union membership
  - Information about criminal convictions and offences

You are asked to keep this information up to date, by advising the Senior Operations Manager of any change. You will be asked to check the accuracy from time to time.

Your rights as a Data Subject are as follows:

1. The right to be informed of the personal information we hold about you.
2. The right to access your personal information (commonly known as a 'Data Subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
3. The right to correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
4. The right to restrict processing of your personal information. This enables you to ask us to suspend the processing of personal information about you; for example, if you want us to establish its accuracy or the reason for processing it.
5. The right to erase personal data if the law permits.
6. The right to transfer your personal information to another party.
7. The right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct-marketing





purposes.

8. Rights in relation to automated decision-making and profiling. If the decision is made to engage in automated decision-making and profiling, you will be consulted about how this will work and what personal information will be used at the time.

## 3. How Personal and Sensitive Information Is Collected

We collect personal information about employees, volunteers, workers, associates and contactors through the application and recruitment process, either directly from candidates, or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties, including former employers, credit reference agencies or other background check agencies such as the disclosure and barring service (DBS).

We will collect additional personal information in the course of job-related activities throughout the period of your working for us.

## 4. How We Will Use Information About You

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

## 5. Processing Your Information

We need all the categories of information, as previously set out, primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed as follows and this includes information that is shared with third parties that assist us with payroll, HR support, and health and safety (H&S) matters:

- Making a decision about your recruitment or appointment.
- Determining the terms under which you work for us.
- Checking you are legally entitled to work in the UK.



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- Paying you, and if you are an employee, deducting tax and National Insurance contributions.
- Providing a range of benefits to you.
- Liaising with your pension provider.
- Liaising with vehicle and leasing companies.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, appraisals, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, volunteers, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- Complying with legal obligations, such as accident reporting and court orders.
- Preventing fraud.
- Monitoring your use of our information and communication systems to ensure compliance with our information technology (IT) policies.
- Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems, and preventing malicious software distribution.
- Conducting data analytics studies to review and better understand employee retention and attrition rates.
- Monitoring equal opportunities.

Some of the aforementioned grounds for processing will overlap and there may be several grounds that justify our use of your personal information.





If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as ensuring the health and safety of our workers).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. How We Use Particularly Sensitive Personal Information

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our policies in force at any time.
3. Where it is needed in the public interest, such as for monitoring equal opportunities or in relation to our occupational pension scheme, and in line with our policies at any time.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims, where it is needed to protect your interests (or someone else's interests), and you are not capable of giving your consent, or where you have already made the information public.

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, including sickness absence or family-related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, to assess your fitness to work; to provide appropriate workplace adjustments; to monitor and manage sickness absence; and to administer benefits.
- We will use information about your race, national or ethnic origin; religious, philosophical, or moral beliefs; or your sexual life or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.





We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## 7. Information About Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our policies in force from time to time.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of your working for us.

## 8. Data Sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK. If we do, you can expect a similar degree of protection in respect of your personal information.

### Which third-party providers process my personal information?

'Third parties' includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision, HR support, legal support, background screening checks and administration, and IT services.

### How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own







purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

## What about other third parties?

We may share your personal information with other third parties; for example, in the context of the possible sale or restructuring of the charity. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## Sharing outside of the UK

We may from time to time have to transfer the personal information we collect about you to other countries out of the UK. This may be in order to perform our contract with you or as part of our regular reporting activities on company performance. There will be an adequacy decision in respect of these countries.

This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information, ensuring that those third parties treat your personal information in a way that is consistent with, and which respects the UK laws on data protection.

## 9. Access and Storage

You can access the information held about you, by contacting our Data Protection Officer, this request must be responded to within 1 month.

Personal and sensitive information is stored in the following ways:

- Manually, in locked filing cabinets.
- Electronically in password protected files, with authority levels and on secure servers. We make every effort to ensure that these servers are located within the UK.

## Duration of Retention

- Applicant information (potential employees/volunteers)–CV and other recruitment documentation/information will be stored for 6 months from the last date of contact.
- Ex-employees – files will be reviewed following the termination of employment and relevant information retained for 6 years.
- Payroll information will be kept for 6 years
- During employment – only relevant documents will be held on your file.
- Volunteers - 2 years after your volunteering role ends and 6 years if your personal data relates to a formal complaint or a reported health and safety incident.





## 10. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and are subject to a duty of confidentiality.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have established procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 11. Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data and whether we can achieve those purposes through other means; and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you; in which case, we may use such information without further notice to you. Once you are no longer an employee, volunteer, worker, associate or contractor of the company we will retain data for the specified period and securely destroy your personal information in accordance with applicable laws and regulations.

## 12. Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please **contact the Senior Operations Manager or CEO**. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 13. How to Complain

Should you be unhappy with how we are handling your data, we would hope that you will contact us in the first instance.





Alternatively, should you wish to complain you can contact the relevant Supervisory Authority which is the Information Commissioners Office: [www.ico.org](http://www.ico.org) Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 14. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact the Senior Operations Manager.**

## 15. Signature

I, \_\_\_\_\_ (employee/ volunteer/ worker/ contractor/ associate name), acknowledge that on \_\_\_\_\_ (date), I received a copy of Bethel Health and Healing Network's Privacy Notice for employees, volunteers, workers , associates and contractors and that I have read and understood it.

**Signature:**

**Date:**

**Name:**

