**FYC DATA PRIVACY NOTICE**

**The Board of Furzedown Youth Centre LTD (FYC)**

Privacy Statement

Here at FYC we take your privacy seriously and will only use your personal information to administer your application for employment. If you would like more information please contact our Data Protection Officer by writing to FYC at The Vicarage, 63 Chillerton Road, London, SW17 9BE.

**Privacy notice: June 2019**

This privacy notice is about how your personally identifiable information will be managed from job application through to starting work. The information is needed to help recruit the best people, perform the necessary employment checks, arrange a contract of employment, get new recruits started in their work and fulfil legal/regulatory requirements. These are necessary steps prior to being able to establish, continue or vary a contract of employment.

During recruitment, the recruiters consider the information provided on the job application form and that provided for assessments and interviews.

As you get further through the process, employment checks may need to be performed such as identity, right-to-work (immigration), criminal records, professional registration, qualifications, references, occupational health and other checks. More information or documentation, such as proof of identity documents, may be needed from you. Only the necessary information is shared with organisations where they assist us with these checks and it is only for the purpose of performing those checks.

To get a new recruit started in their work, induction training and some administrative requirements are completed. Some information will be requested from you at that time, such as bank details for your salary payments and emergency contact details in case you have an emergency at work. The information for those who have been recruited is entered into the employee management and records keeping systems that are used by the employer.

If you do not provide information as needed, this may hinder or prevent your application or employment.

If you indicate that you can be considered for a preferential or guaranteed interview owing to a disability you have, that information is used only for the purposes of arranging interviews.

If you decide that you wish to leave a job application process, you can login to your applicant account then withdraw your application. For special cases (examples above) you should instead contact the employer.

Your information about your application through to starting work is automatically deleted from this recruitment management system once it is no longer regarded as necessary for the purpose for which it was collected. This is 399 days after the date the application was entered in this recruitment system or 199 days after your proposed/actual start date, whichever is the greater. This period allows obligations relating to lawful employment practices to be fulfilled such as statistical reporting and the defending of potential legal claims.

The data controller for this information is Furzedown Youth Centre Ltd (FYC).

PRIVACY NOTICE FOR EMPLOYEES, WORKERS, AND CONTRACTORS

INTRODUCTION

FYC is committed to protecting your personal data. This Notice sets out important information about how the we collect and use your personal data during the course of your working relationship with us and after this working relationship has ended. It applies to all employees, workers and contractors, including anyone whose data we hold by virtue of them being on an honorary contract at FYC. Any references used during the course of this Notice that refer to "employer", "employee", or "employment" should not be used to infer that any employment relationship exists between FYC and any workers, honorary contract holders or contractors to whom this Notice applies.

You should read this Notice carefully and raise any questions you may have with your local HR team or Data Protection Officer.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

SCOPE

In connection with your working relationship with FYC, the relevant data controller is The Furzedown Youth Centre Ltd.

WHAT PERSONAL DATA DO WE COLLECT?

Personal data means information which identifies you and relates to you as an individual. As your employer, FYC will collect, use and store your personal data for a wide variety of reasons in connection with the working relationship. We have set out below the main categories of personal data which we process on a day to day basis:

• personal contact information (including your name, home address, personal telephone number(s) and personal e-mail address)\*
• business contact information (including e-mail address and telephone number)
• job title
• date of birth\*
• national Insurance number\*
• emergency contact information and next of kin
• photograph\*
• documents evidencing your right to work (including information about your immigration status where relevant)\*
• documents gathered during the recruitment process (including cv, application form, cover letter, any other information obtained as part of the application process, references, professional memberships and qualifications, background vetting information)\*
• documents maintained and updated during your working relationship relating to professional memberships and qualifications and statutory and mandatory training (including but not limited to professional revalidation)\*
• general HR records including details of training, disciplinary and grievance matters, benefits, holiday and other absences, along with a copy of your employment contract / contract for services, performance records (including appraisals) and compensation history\*
• information about your use of our information and communications systems
• personal data which you otherwise voluntarily provide, for example when using your FYC e-mail account
• Payroll data including bank account details\*

The personal data provided by you and identified at \* above is mandatory in order for us to administer the working relationship and/or comply with statutory requirements relating to immigration or taxation. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this Notice and potentially affect your ongoing working relationship.

The list set out above is not exhaustive, and there may be other personal data which FYC collects, stores and uses in the context of the working relationship. We will update this Notice from time to time to reflect any notable changes in the categories of personal data which we process.

The majority of the personal data which we process will be collected directly from you. In limited circumstances your personal data may be provided by third parties, such as former employers, an employment agency or background check provider, credit reference agencies, official bodies (such as regulators , Health Education England or criminal record bureaus) and medical professionals.

HOW DO WE USE YOUR PERSONAL DATA?

FYC uses your personal data for a variety of purposes in order to perform its obligations under your employment contract, to comply with legal obligations or otherwise in pursuit of its legitimate organisational interests. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We have set out below the main purposes for which employee personal data is processed:

• checking you are legally entitled to work in the UK
• determining the terms on which you work for us
• paying you and, if you are an employee, deducting tax and National Insurance contributions and the administration of benefits under the employment contract
• liaising with your pension provider, as applicable
• making deductions to your salary for any trade union membership fees, as applicable
• the day to day management of tasks and responsibilities
• education, training and development requirements
• ascertaining your fitness to work
• managing sickness absence
• to manage and assess performance, including the conduct of annual appraisals, as applicable
• to consider eligibility for promotion or for alternative roles within FYC as applicable
• to comply with legal requirements, such as reporting to the local tax authority or professional regulators
• to address disciplinary and grievance issues with individual employees
• to protect FYC’s confidential and proprietary information, and intellectual property
• to monitor the proper use of FYC’s IT systems
• to prevent fraud against FYC and its clients
• to safeguard the interests of FYC’s clients
• to conduct data analytics studies to review and better understand employee issues such as sickness absence levels, performance and vacancy rates
• to monitor and evaluate FYC’s performance against its organisational and staffing objectives
• if an organisational transfer or change of ownership occurs or service transfers as defined by TUPE

Again, this list is not exhaustive and FYC may undertake additional processing of personal data in line with the purposes set out above. FYC will update this Notice from time to time to reflect any notable changes in the purposes for which it processes your personal data.

WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS?

Certain categories of data are considered "special categories of personal data" and are subject to additional safeguards. FYC limits the special categories of personal data which it processes as follows:

• Health Information

FYC may process information about an individual's physical or mental health in compliance with its obligations in connection with employment, in particular (i) to administer sick pay entitlements; (ii) to facilitate the assessment and provision of Injury Allowance; (iii) to provide appropriate workplace adjustments; and (iv) to maintain a sickness absence record.

We will always treat information about health as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure.

Health information will typically be retained during the course of an individual's working relationship with FYC. Following the termination of an individual's working relationship, we will typically retain health information held by FYC for 6 years subject to any exceptional circumstances and/or to comply with particular laws or regulations.

• Disclosure and Barring checks/information (DBS)

We are required to carry out DBS checks for specific positions and professions. In all cases, we carry out the checks in line with the eligibility guide for DBS checks.

We will always treat DBS information as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure.

Information about a DBS check such as the date when a DBS check was made, what type of DBS check was carried out and the fact that the outcome of the DBS check was deemed to be satisfactory by FYC will typically be retained up to a maximum of 12 months on the FYC system, subject to any exceptional circumstances and/or to comply with particular laws or regulations.

WHEN DO WE SHARE YOUR PERSONAL DATA?

FYC will share your personal data with other parties only in limited circumstances and where this is necessary for the performance of the employment contract or to administer the working relationship with you or to comply with a legal obligation, or otherwise in pursuit of its legitimate business interests as follows:

• payroll providers

• benefits providers

• background vetting specialists

• occupational health providers

• in response to requests for references from third parties (i.e. prospective future employers)

• social welfare entities for taxation purposes or where such information is requested in order for you to receive benefits

• HMRC and/or any other applicable government body

• Data sharing required by TUPE e.g. employee liability information

In all cases not governed by regulation or legislation, your personal data is shared under the terms of a written agreement between FYC and the third party which includes appropriate security measures to protect the personal data in line with this Notice and our obligations. The third parties are permitted to use the personal data only for the purposes which we have identified or as is permitted by law, and not for their own purposes, and they are not permitted to further share the data without our express permission.

FOR HOW LONG WILL MY PERSONAL DATA BE RETAINED?

FYC’s policy is to retain personal data only for as long as needed to fulfil the purpose(s) for which it was collected, or otherwise as required under applicable laws and regulations. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to retain and use such anonymous data for any legitimate business purpose without further notice to you.

Once you are no longer an employee, worker or contractor of FYC we will typically not retain data.

WHAT ARE MY RIGHTS IN RELATION TO MY PERSONAL DATA?

FYC will always seek to process your personal data in accordance with its obligations and your rights.

You will not be subject to decisions based solely on automated data processing without your prior consent.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format. If you have any questions about these rights, please contact your local Data Protection Officer using the details set out below.

You have a separate right of access to your personal data processed by FYC. You may be asked for information to confirm your identity and/or to assist FYC to locate the data you are seeking as part of FYC’s response to your request. If you wish to exercise your right of access you should set out your request in writing to your local Data Protection Officer using the details set out below.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Information Commissioner's Office (ICO) by going to the ICO's website: https://ico.org.uk/concerns/ or contacting the ICO on 0303 123 1113 or casework@ico.org.uk.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please check that your personal information is up to date and keep us informed if your personal information changes during your working relationship with us by using the employee self-service portal.

WHERE CAN I GET FURTHER INFORMATION?

FYC has appointed a Data Protection Officer to oversee compliance with this Notice and to deal with any questions or concerns. If you would like further information about the matters set out in this Notice, please contact the FYC’s Data Protection Officer.

The contact details for your Data Protection Officer are set out below:

Geoff Vevers: g.vevers@pobroadband.co.uk

**Consent**

I have read and consent to my personal data, as detail above, being held and utilised by FYC for the purposes stated.

Signed: ………………………………………………………………. Date: ………………………………….

Please return before ??? to

Rev Canon Geoff Vevers at: g.vevers@pobroadband.co.uk

Or post to: The Vicarage, 63 Chillerton Road, London, SW17 9BE.