

# PRIVACY NOTICE FOR EMPLOYEES

## What is the purpose of this Notice?

This Privacy Notice aims to give you information on how we collect and process your personal information throughout your working relationship with us. It makes you aware of how and why your personal information will be used, how it will be stored and how long we will retain the data. NPH will be the 'Data Controller' for these purposes which means that we are responsible for deciding how we will hold and use your personal information.

This notice provides you with the information which must be provided under the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

## What information do we collect?

We collect and process your personal data because of our employment, contractor, volunteer or equivalent relationship with you.

Personal Information is defined in the UK GDPR. It is any information which can be used to identify a living individual either directly or indirectly. It therefore includes for example, name, address, online profiles, cookie identifiers, and other identifiable information.

Special Category Data – is personal data which is considered to be sensitive and therefore requires specific protection. The categories of special category data are:

- race or ethnic origin
- political views and affiliations
- religious or philosophical beliefs
- trade union membership
- genetics
- biometrics (where used for ID purposes, for example, facial recognition)
- health

We collect and process a range of information about you, which includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender
- the terms and conditions of your employment
- employment references and the results of any pre-employment screening or recruitment paperwork

- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with NPH
- information about your pay, remuneration and pension (where applicable)
- details of your bank or building society account and national insurance number
- information about your marital status, next of kin, dependants and emergency contacts
- information about your nationality and entitlement to work in the UK
- information about your criminal record (where applicable)
- photographs used for staff passes, building access etc
- details of your schedule (days of work and working hours) and attendance at work
- details of periods of leave taken by you such as holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
- details of any disciplinary, grievance or any other procedures in which you have been involved, including any warnings issued to you and related correspondence
- assessments of your performance, including appraisals, performance reviews, training you have participated in, performance improvement plans and related correspondence
- health and Safety data, for example, Accident Reports, Risk Assessments, vehicle licence plate, RIDDORs and so on
- information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments
- details of trade union membership
- equal opportunities monitoring information, including information about your ethnic origin, age, gender, sexual orientation, disability and religion or belief
- to promote joint working practices across the organisation, we may publish photographs on the intranet. Your photograph may also be used in promotional material and on social media, though you can withdraw your consent for your image to be used in this way. To withdraw consent email the Comms team at [Communications.NPH@nph.org.uk](mailto:Communications.NPH@nph.org.uk) or speak to the team directly.

## **How we collect the information**

We collect it from you during the recruitment and onboarding process. We also collect your personal data from third parties including recruitment agencies, providers of agency workers, former employers (for reference purposes) and background screening providers. We also collect and generate additional personal data throughout the period you work for or with us. We don't collect anything you wouldn't expect us to collect and we will not collect any personal data we do not need.

## **Legal Basis for processing the information**

We primarily use your personal data to manage, administer and maintain our relationship with you in line with the contract of employment, volunteer agreement or contract for services with you. This includes paying you, reimbursing you, providing you with employment benefits, performance reviews and management, managing disciplinary, capability and grievance processes, ensuring your health and safety in the workplace, managing sickness, determining training and development requirements and making decisions about career progression or ending our working/volunteering relationship and ensuring your eligibility to work in the UK.

Occasionally the information will be processed in order for NPH to comply with a legal obligation, this includes checks on eligibility to work in the UK and tax deductions.

Where it is in our legitimate interests (or those of a third party) to do so

We may also use your personal data in the following situations, which will be less common:

- With your consent
- Where we need to protect your vital interests
- Where it is needed in the public interest

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). Trade union membership data will be processed to allow subscriptions to be made.

The processing of other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, is done for the purposes of equal opportunities monitoring. Data used for these purposes is anonymised or collected with your express consent and can be withdrawn at any time. Employees are

entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

### **Who we share your information with**

We share your personal information with third parties where required by law, where it is necessary to administer the employment relationship we have with you, where we have a legitimate interest in doing so or where you have provided consent for us to share the information. The third parties include inter alia payroll, pension administration, benefits provision and administration and IT services.

In some cases we may share your information with service providers who will also be data controllers, such as providers of agency workers if you are working with us through an agency. They will provide their own Privacy Notice on how they use your personal data.

All third-party service providers (our data processors) with whom we share your personal data are required to take appropriate security measures to protect your personal data 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.

NPH will not transfer your data to countries outside the European Economic Area.

### **How long we keep your data**

We only retain your personal data 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. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Our Data Retention Policy sets out the retention periods for the different types of information we collect and hold. Please contact the Data Protection team if you would like to know the retention period applicable to your personal data.

## **How we keep your personal information secure**

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

Procedures to deal with a suspected data security breach are in place. We will notify you of any breach of your personal information, and where necessary will also notify the Information Commissioner's Office.

## **Your Rights**

Under the UK GDPR you have rights regarding your personal information which NPH holds and processes:

- Right to be informed – this notice informs you of how and why your personal information will be collected and used, how it will be stored and how long we will retain the data
- Right of Access – you have the right to request a copy of the information we hold about you. These requests are known as 'Subject Access Requests' (SAR) and will be processed within one month of receiving the request.
- Right to rectification – you have the right to request any outdated, incorrect or inaccurate information we hold about you be rectified. Such request will be processed within one month of receiving the request.
- Right of erasure – you can ask us to delete your personal information such as when the information is no longer necessary, or you withdraw consent for us to use that information. In certain circumstances we may be unable to comply with your request on legal grounds, but we will notify you if this situation arises.
- Right to restrict processing – you have the right to ask us to restrict the processing of your personal information in certain circumstances
- Right to data portability – you have the right to ask us to transfer the information, which you gave us, to another organisation, or to you, in certain circumstances

- Right to object – you have the right to NPH processing your personal information in certain circumstance
- Rights in relation to automated decision making and profiling – at this stage NPH does not use automatic decision making or profiling software for recruitment or employment purposes.

To exercise your rights please contact the Data Protection team on [dataprotectionNPH@nph.org.uk](mailto:dataprotectionNPH@nph.org.uk) or on 0300 330 7003. You can also write to the DPO by post at Northamptonshire Partnership Homes, The Guildhall, St Giles Square, Northampton, NN1 1DE.

For further information on your rights or if you are not satisfied with the way NPH has handled your personal information, you have the right to complain to the Information Commissioner's Office.

The ICO is an independent body set up to uphold information rights in the United Kingdom. They can also provide advice and guidance, and can be contacted through [their website](#), via their helpline on 0303 123 1113, or in writing to:

- Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF