



Privacy Notice for Employees, Workers and Consultants

Updated October 2021

PRIVACY NOTICE

What is the purpose of this document?

Community Places Limited is committed to protecting the privacy of your personal information.

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

It applies to all employees, workers and contractors.

Community Places Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you under data protection legislation to notify you of the information we hold about you and to give you access to this information. This privacy notice.

This notice applies to applicants, current and former employees and contractors. This notice does not form part of any contract or agreement between us and you. We may update this notice at any time.

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

Data protection principles

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

purposes.

4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.

- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of documentation, references and other information cover letter or as part of the application process).

- Employment records (including job titles, work training records and professional memberships).

- Compensation history.

- Performance information.

- Disciplinary and grievance information.

- CCTV footage and other information obtained through such as Fob records.

- Information about your use of our information systems.

- Photographs.

We may also collect, store and use the following more sensitive personal information:

- Information about your race or ethnicity, religion, sexual orientation and political opinions.

of your first and second doses, any booster doses, the manufacturer of the vaccine you received, the method by which this information was shared and details of any medical exemption(s).

2. Where it is needed in the public interest or for official purposes

Situations in which we will use your personal information

- Information about the results of Lateral Flow Tests and/or Polymerase Chain Reaction Tests you take, including details of any consent you have provided for us to receive your test results.
- Information about criminal convictions and offences.

We need all the categories of information in the list above (1) we hold about you) primarily to allow us to perform our core business. We may use your personal information to pursue legitimate interests 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 set out below.

How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We sometimes collect additional information from third parties including former employers, testimonials and criminal records (DBS) checks.

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

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

- Making a decision about your recruitment or application
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider.
- Administering the contract we have entered into with you
- Business management and planning, including accounting and financial reporting
- Conducting performance reviews, managing and determining performance requirements.
- Making decisions about salary reviews and compensation

- 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, workers and contractors, including accidents at work.
- Ascertaining your fitness to work, including making a referral to Occupational Health, and/or to support networks for drug and alcohol addictions.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.

a benefit), or we may be prevented from complying with our obligations as to ensure the health and safety of our workers).

Change of purpose

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

Please note that we may process your personal information w or consent, in compliance with the above rules, where this is by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information levels of protection. We need to have further justification for using this type of personal information. We may process 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 protection policy.
3. Where it is needed in the public interest, such as for monitoring, and in line with our data protection policy.
4. Where it is needed to assess your working capacity on health

Some of the above grounds for processing will overlap and there may be appropriate confidentiality safeguards.

members or former members in the course of legitimate business activities with the appropriate safeguards.

Our obligations as an employer

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

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.
- 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 only collect information about criminal convictions if the nature of the role and where we are legally able to do so. We will collect information about criminal convictions as part of t
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. or we may be notified of such information directly by you working for us. We will use information about criminal convictions and off ways:

Do we need your consent?

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

We may only use information relating to criminal convictions and cautions, warnings or orders to do so. This will usually be where such processing is necessary for our legitimate obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions and cautions, warnings or orders necessary in relation to legal claims, where it is necessary to process such information in order to protect our interests (and yours) and you are not capable of giving us your consent.

We will only collect information about criminal convictions if the nature of the role and where we are legally able to do so. We will collect information about criminal convictions as part of t

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

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.

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or we may be notified of such information directly by you working for us.

We will use information about criminal convictions and off ways:

ways:

To make safer recruitment and employment decisions, we will use information about criminal convictions and cautions, warnings or orders to identify unsuitable people from working with vulnerable groups.

We will only collect information about criminal convictions if the nature of the role and where we are legally able to do so. We will collect information about criminal convictions as part of t

We will provide information about whether the person you are applying to work with a vulnerable group is barred from working with such a group.

automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days for reconsideration.

2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

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 will share your personal information with third parties where it is necessary to administer the working relationship or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including designated agents) and other entities within our group. The services are carried out by third-party service providers: pension administration and IT services.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate measures to protect your personal information in line with our policies and allow our third-party service providers to use your personal information for their purposes. We only permit them to process your personal data in accordance with our instructions.

What about other third parties?

We may share your personal information with a regulator or other third party with the law, e.g. to help with a criminal investigation.

Even when seeking to notify the local authority of a safeguarding incident or the Quality Commission of an incident that requires us to notify it, we will do so with the consent or ensure that the information provided is treated as confidential.

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 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 they are subject to a duty of confidentiality. Details of these measures may be requested from our Data Processor.

We have put in place 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.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary for the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our information governance policy which is available to access through share point or can be requested from a member of the management team. 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

time and

In some circumstances we may anonymise your personal information so it no longer be associated with you, in which case we may use such information in an authorised way without further notice to you. Once you are no longer an employee, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Right to access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is current. Please keep us informed if your personal information changes during your working relationship with us.

You fulfil the connection with personal information

Under certain circumstances, by law you have the right to: **Request access** to your personal information (including information we hold about you and whether we are lawfully processing it). This enables you to request access to your personal information we hold about you and whether we are lawfully processing it. **Request correction** of the personal information we

exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are processing on a legitimate interest (or those of a third party) and there is something about your particular situation which 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.

- **Request the restriction of 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.

- **Request the transfer** of your personal information to another party.

identity and ensure your right to access the information (or other rights). This is another appropriate security measure to

information is not disclosed to any person who has no right to

Right to withdraw consent
In the limited circumstances where you may have provided collection, processing and transfer of your personal information, you have the right to withdraw your consent for the purpose, any time. To withdraw your consent, please contact Data Protection Officer. If you have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally consented to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee our data protection activities. If you have any questions about this privacy notice, or if you wish to exercise any of your rights, please contact the DPO. You have the right to lodge a complaint at any time to the Information Commissioner's Office (ICO), the supervisory authority for data protection issues.

Changes to this privacy notice

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

If you want to review, verify, correct or request erasure of your personal information, or object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Data Protection Officer in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is

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01484 868823

dataprotectionofficer@communityplaces.co.uk

.....
acknowledge that on _____ (c
copy of Community Places Limited's Privacy Notice for e
and contractors and that I have read and understood it.

Signature

.....

Name

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Issued 17 May 2018