

Introduction

This privacy policy describes what personal data we collect and process about you and how we use it. We explain what choices you have relating to your personal data and your rights.

How your information will be used

As your employer, the organisation needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will use it to enable us to manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, when your employment ends and after you have left. Our lawful basis for processing your information is to enable us to take steps at your request before entering into an employment contract with you as part of the recruitment process, to comply with the employment contract when you work for us, to comply with any legal requirements, and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

Other lawful bases may apply when we may:

- use or disclose information about you with your consent,
- to protect your vital interests or those of someone else in matters of life and death.
- Use or disclose it in our legitimate interests (or those of other organisations) to operate effectively as a business, for example for information security, or fraud prevention.

What Information We Hold

Much of the information will have been provided by you, but some may come from other internal sources, such as your line manager, or in some cases, external sources, such as referees.

The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with or about you; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for our equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records. You will also be referred to in many organisational documents and records that are produced by you and your colleagues in the course of carrying out your duties and the delivery of the organisation's services.

Where necessary, we may keep information relating to your health, which could include reasons for absence, medical reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations; to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this information to administer and manage statutory and company sick pay, life insurance and other staff benefits.

Where we process special category information, for example relating to your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, the additional conditions we may rely on include:

- For us to meet our obligations in employment and the safeguarding of your fundamental rights, or
- It is necessary for us to comply with legal obligations, or
- To use or disclose some of this information in an emergency, to protect your vital interests or those of someone else in matters of life and death.

As part of the recruitment process and your employment we may obtain information about criminal convictions, offences and proceedings, or disclose this information about you. Our lawful basis for this is for performance of our employment contract with you, and to comply with our legal and contractual obligations.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

In addition, we may monitor computer and telephone use, as detailed in our ICT policies. Our lawful basis for this is in the legitimate interests of our organisation, for security and ensuring that our policies are being adhered to.

Who We Disclose To

We may disclose information about you to third parties if we are legally obliged to do so, where the Data Protection Act permits this, for example for safeguarding, prevention or detection of crime or the apprehension or prosecution of offenders, or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to auditors, legal advisors, the pension provider or health insurance schemes. We may disclose or share relevant information with our service providers so they can carry out work for us.

Sending Information Overseas

Some of the third-party services we use may involve personal information being accessed or processed outside the UK.

We currently use:

- Mailchimp, a US-based platform used for marketing and communications, with appropriate safeguards in place for any transfer of personal information.
- External database developers based in Canada, who access our UK-hosted database through a secure VPN. Any personal data temporarily accessed or transferred for development purposes is subject to contractual and security controls and deleted when no longer required.

We review international processing arrangements when suppliers, processing activities or locations change, and ensure that appropriate safeguards are in place before personal information is transferred outside the UK.

Website, Social Media and Publicity

Social media providers process personal information in accordance with their own privacy policies, which we encourage you to review before providing personal information through those platforms. Where you communicate directly with us through social media, we will handle any personal information we receive in accordance with this Privacy Policy.

We may publish photographs, stories or other information about you on our website or social media. We will obtain your consent before doing so and will remove material from active use if consent is withdrawn.

How Long We Hold Your Personal Data

We hold it for as long as you are employed with us, and for up to seven years after that, unless we have a legal or other business requirement to keep it for longer. Any personal data that we do not need to keep will be securely destroyed. Please see our information retention policy for further details.

Your rights

You have the right to request access to and rectification or erasure of your personal data, the right to restrict processing, object to processing and the right to data portability (where we are able to provide it so it can be used elsewhere). Not all of these rights may be available to you, depending on the circumstances, and our business or legal obligations to hold and use it.

If you have any concerns as to how your information is processed please contact the Chief Executive, who is the Data Protection Officer at Shared Lives South West.

Email: dspayne@sharedlivessw.org.uk or tel: 01626 360170

You have the right to make a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the General Data Protection Regulation or Data Protection Act. Their website is at www.ico.org.uk or telephone 0303 123 1113 (local rate) or 01625 545 745.