

## One25 Employee Privacy Policy

One25 is committed to protecting your privacy. This statement explains when, how and why we collect information about you, how we use it, the circumstances in which we may disclose it to others and the way we work to keep your information safe and secure. We will never sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

### **Who are we, how you can contact us and other useful contacts**

We are a registered charity (in England and Wales no. 1062391 and a registered company no. 3362644). Our registered office is at the address below. One25 is registered with the Information Commissioners Office with the registration reference Z2275233.

Any questions you have in relation to this policy or how we use your personal data should be sent to [dataprotection@One25.org.uk](mailto:dataprotection@One25.org.uk) or to the address below.

The Data Protection Officer,  
One25  
138A Grosvenor Road  
St Pauls  
Bristol  
BS2 8YA  
Tel: 0117 909 8832

You can find further information on data protection and privacy at: [www.ico.org.uk](http://www.ico.org.uk)

### **Legal basis for One25 to collect data**

The legal basis for One25 to collect and processes personal data relating to its employees is that it has a legitimate interest in managing the employment relationship. One25 is committed to being transparent about how it collects and uses that data and to how it meets its data protection obligations.

### **What information does the One25 collect?**

One25 collects and processes a range of information about you. This 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;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the One25;

- information about your remuneration, including entitlement to benefits such as pensions;
- details of your bank 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;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, line management notes, performance reviews, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the One25 needs to make reasonable adjustments; and

One25 may collect this information in a variety of ways. For example, data might be collected through application forms, CVs, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the start of, or during employment (such as benefit nomination forms), from correspondence with you or through interviews, meetings or other assessments.

In some cases, One25 may collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

### **Why does the Company process personal data?**

One25 needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer your pension entitlements.

In some cases, One25 needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, One25 has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows One25 to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;

- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that One25 complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current/former employees or for mortgage applications; and
- respond to and defend against legal claims.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where One25 processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that One25 uses for these purposes is anonymised or is collected with the express consent of employees, which 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 has access to data?**

Your information may be shared internally, including with members of the Operation Support Team, the Senior Management Team, HR Sub Group and your line manager.

One25 shares your data with third parties in order to obtain pre-employment references from other employers, and obtain necessary criminal records checks from the Disclosure and Barring Service.

One25 also shares your data with the Inland Revenue as we are legally required to do.

One25 also shares your data with third parties that process data on its behalf e.g. our payroll bureau, our pension administrator, our HR provider, our bankers and our accountants.

It is possible your data may be transferred or stored across borders. Personal data will only be transferred out the UK or European Economic Area to countries which are considered adequate under the EU Data Protection Directive, in the case the organisation subscribes to a certification scheme (e.g. EU-U.S. Privacy Shield Framework), or under contract, subject to EU model contract clauses for personal data transfer.

### **How does the Company protect data?**

One25 takes the security of your data seriously. One25 has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. We maintain appropriate organisational and technical security measures.

Where One25 engages with third parties to process personal data on its behalf, they do so on the basis of written instructions, and are under a duty of confidentiality and are obliged to implement appropriate technical and One25's measures to ensure the security of data.

### **For how long does the Company keep data?**

One25 will hold your personal data for the duration of your employment, and your data is retained by us as part of your employee file for 6 years following the end of your employment.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require One25 to change incorrect or incomplete data;
- require One25 to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where One25 is relying on its legitimate interests as the legal ground for processing.

If you believe that One25 has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You have some obligations under your employment contract to provide One25 with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide One25 with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable One25 to enter a contract of employment with you. If you do not provide other information, this will hinder One25's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

**Automated decision-making**

Employment decisions are not based solely on automated decision-making.

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| Reviewed By      | Sophie Whitaker, Finance and Resources Manager |
| Reviewed Date    | September 2020                                 |
| Next Review Date | September 2022                                 |
| Distribution     | All Staff and Trustees                         |