

## 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 and a contractual obligation to fulfil the requirements of an employment contract. As an employer, it also has certain legal obligations to fulfil. 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 and any communications regarding changes to it;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the One25, as well as any other information produced during our recruitment processes (such as CVs, applications and interview notes where applicable);
- references, including any references provided to us from your former employers or education institutions, or copies of references provided by us to your prospective employers;
- information about your remuneration, including entitlement to benefits such as pensions and any communications regarding changes to your remuneration or benefits;
- pension records, including pension provider, pension policy number and contribution levels;
- details of your bank account, national insurance number, payroll records, tax status information and any other information required for payroll and benefit administration purposes;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK, including copies of any relevant documentation;
- 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;
- Information regarding professional memberships that may be relevant to your role;
- Information regarding secondary employment;
- 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;
- information in relation to diversity and inclusion, such as age, racial or ethnic origin, religious or philosophical belief and sexual orientation which you may disclose or provide to us in the course of your employment through line management supervision or in instances where these characteristics may be relevant to us fulfilling our responsibilities as an employer (other routine equalities monitoring is optional and anonymous)
- CCTV footage of certain areas of One25's premises which could include your image if working in these areas.

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, including from the following sources:

- information from recruitment agencies;
- references supplied by former employers;
- information from reference-checking agencies;
- health / medical information from your GP or occupational health physicians;
- pension and benefit providers.

### **Information about third parties**

You may provide us with personal data about third parties, including information relating to your next of kin and emergency contacts. We will use this personal data in accordance with this Employee Privacy Policy. You must therefore obtain permission from third parties to share their personal data with us and you must also make the information in this Employee Privacy Policy available to the third parties.

### **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;
- pay you and, where applicable, deduct tax / National Insurance contributions;
- 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 Organisational 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.

We use a variety of systems to store your data securely and their servers may be located either within or outside the UK. It is therefore possible that your data may be transferred, stored and processed in countries outside of your country of residence, which may have data protection rules that are different to those of your country of residence. However, personal data will only be transferred out of the UK or European Economic Area to countries which are considered adequate under the UK General Data Protection

Regulation, in the case the organisation subscribes to a certification scheme, 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;
- withdraw your consent to One25 processing your personal data (where One25 relies on consent to process your personal 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. You can read more about your rights on the ICO website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> and you can telephone the ICO on 0303 123 1113.

### **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**

Decisions about employees are not made based solely on automated decision-making.

Reviewed By	Josie Thurston, Organisational Support Manager
Reviewed Date	June 2023
Next Review Date	June 2025
Distribution	All Staff and Trustees