

Headway Cambridgeshire

Privacy Notice for staff

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1. Introduction

At Headway Cambridgeshire we value people above all else, from our clients to our supporters, from our staff to our volunteers. It is only together that we can transform the lives of people with brain injuries and it is, therefore, of vital importance to us that all individuals connected with the charity are treated with consideration, fairness and respect.

We are committed to protecting your personal data and being open and honest about how and why we use it. We strive to comply with the regulatory framework that governs the way we collect and process personal data:

- the Data Protection Act 1998, which will be replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018 ('GDPR')
- the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This Privacy Notice explains how we collect, store and use your data however you interact with us. It also describes our 'legitimate interests' in the data, as defined by GDPR.

Processing of your information is carried out by Headway Cambridgeshire, registered as a charity in England and Wales (1062886) and registered as a company in England (3364699).

If you have any queries at all then please do not hesitate to contact us:

Email: info@headway-cambs.org.uk

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

2. How we use your data

In order to ensure fair, safe and responsible treatment of job applicants and employees and to run the organisation effectively, we will need to request and process certain personal data.

Some information will be needed to fulfil our contractual obligations to you as an employee, for example to pay salary and expenses. This would include personal details such as date of birth and bank account details. You may also request for us to process additional data which relates to court judgements, CSA or student loan payments. This information would be passed on to our payroll provider and bank for processing payments to you. They will also pass this information on to HMRC for tax purposes, which is a legal requirement.

We will also collect and process some personal data to fulfil our legal obligations as your employer. This includes records of periods of sickness absence and evidence of right to work in the UK. This information will be passed on to payroll providers and HMRC although details of reasons for sickness absence will never be passed on.

We are also required to record details of any incidents or accidents which have occurred at work. These will be passed onto the Health and Safety Executive as necessary. Data about employees' health is considered to be 'special category data' under GDPR. We are able to process this under Article 9 Condition (b):

“processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject”.

We are required by the Pensions Regulator to check all staff for eligibility for auto enrolment and automatically enrol all eligible employees into our pension scheme. This involves passing on some basic personal details to our pension provider.

There are some circumstances where we have a legitimate interest in processing staff personal data in order to maintain organisational standards and the welfare of staff and the clients we support. These are outlined below.

In order to ensure a safe environment for the vulnerable adults we support we ask all staff to undertake an Enhanced DBS check at the point that a job offer is made, and then every 3 years

during employment with us. We deal with the details of any convictions disclosed in line with our Disclosure and Barring policy (copies available on request) and the Rehabilitation of Offenders Act (1974).

During the course of your employment - through recruitment, performance management and support processes - you may disclose to us personal information, for example about disability, health or family circumstances. Where this is relevant to your work or maintaining welfare in the workplace we may record this information, for example in supervision records. We will only record what is necessary and will treat this information confidentially.

We take the safety of our staff very seriously so have monitoring systems in place for when they are working alone in the community. This requires us to pass some personal information to the company that provides this service. We have measures in place to ensure that monitoring only occurs when necessary.

You may be asked to take part in the organisation's communications and media activities. As outlined in section 6 this will be part of you contractual obligations.

3. Social media

We have social media accounts on platforms including Facebook, Twitter, YouTube and Instagram. When you interact with us on these sites you may indirectly provide us with personal data. The data that we receive will depend on your own personal privacy settings and the individual privacy policies of these platforms. If this is something that you are concerned about then we would recommend that you check your privacy settings and the privacy notices on these platforms. Any data that we do receive in this way will be treated with the same respect and ethos as other data laid out in this notice. In the unlikely event that we use this data we will only do so where we have assessed that we have a legal basis to process.

4. Marketing communications and your preferences

We feel that it is important to keep you up to date with what we are doing at Headway Cambridgeshire and share with you marketing communications which are sent to our clients,

volunteers and supporters. All members of staff, therefore, are automatically signed up to receiving our communications to their Headway Cambridgeshire email address.

You are also able to subscribe to receive these communications to a personal email address or postal address but we will only send you these in this manner if you have consented for us to do so.

The types of communications we send are as follows:

- Information about the services we offer for people with a brain injury and their families
- Newsletter (twice a year) - email only
- Events
- Fundraising

Each email we send will include the option to unsubscribe from our communications or update your preferences. If you would like to subscribe separately from your Headway Cambridgeshire email account then you can do so using our online sign up form:

http://eepurl.com/c_hcxT

We use the online platform MailChimp to send many of our marketing communications. They have their own Privacy Policy and Terms on their website which we would encourage you to read:

<https://mailchimp.com/legal/>

5. Statistical data

We collect statistical data which helps us to assess our services and evidence the impact of our work. This data is often required by grant funders in our final reporting to them and we also use this data in other ways to publicise our work. This data will only ever be used and presented anonymously; i.e. no personal data will be shared.

6. Media

We create, use and share audio and visual media at Headway Cambridgeshire as it is an important way for us to show who we are, tell our story and explain our services.

Quite often staff will appear in our media, such as photographs, videos and audio clips.

This is part of a contractual obligation included in the contract you sign when you join Headway Cambridgeshire as an employee. However, if you have any problems with this then please speak with your line manager.

We will endeavour to remove media containing staff who have left the organisation within twelve months of their leaving date.

7. How we protect your data

Access to your data is limited and it is only used in accordance with this Privacy Notice for the purposes for which the data was obtained.

We store data both physically and digitally and take all reasonable precautions to make sure that the data disclosed to us is kept secure. Our physical files which contain personal data are kept in locked cabinets in a secure building. Our digital files are held on a password protected server which is controlled by a strict password policy. These files are only accessible by trained staff and our data hosting providers, who have been fully vetted and are subject to the requirements laid out in this Privacy Notice. We are protected from hacking on the internet by a Stateful Inspection Firewall which is password protected.

We may be required by law to share your data, such as in cases of criminal or tax investigations.

We may also share your data with the emergency or statutory services if we reasonably assess that there is a serious risk of harm to either you or any another individual.

When we do share data we do all that we can to make sure that it is protected. Digital files will be password protected and only accessible by the parties that require the information.

We will not, under any circumstances, sell or share your data to a third party for their own purposes or for financial gain. You will, therefore, not receive any third party marketing or communications as a result of sharing your data with us. Similarly, we will not purchase data from any third parties for our own use.

In the unlikely event that a data breach occurs then we will notify any data subjects affected within ten working days and complete a full assessment of the events that led to the breach within 30 working days.

We review our data protection practices regularly to ensure we maintain best practice and keep your data secure.

8. How long we hold your data for

All data we hold in respect of financial transactions, such as client payments or donations, will be held for as long as we are legally required to for tax or accounting purposes. This may be up to six years after a transaction.

For all other data, we will hold this for as long as is necessary for the purpose it was intended and no longer. We will take into account guidance from the Information Commissioner's Office (ICO) in this respect.

Should you request that we no longer process your personal data for the purposes of direct marketing communications then we may need to add some of your details to a suppression file to make certain that we comply with your request and you receive no further communications.

9. Your rights and how to access your data

Under data protection legislation you have a right to see any data that we hold about you. This is called a Subject Access Request (SAR). Should you wish to access the data we hold about you then please contact us in the first instance to discuss the matter:

Email: info@headway-cambs.org.uk
Phone: **01223 576550**
Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

10. Your responsibility to inform us of changes

It is important to us that the information we hold about you is accurate and up to date. Please let us know if there are any changes to this information. You can contact us using the details in point 9 above.

11. How to make a query or complaint

If you have a query about anything in this Privacy Notice or how we use your data, or you would like to make a complaint, then please speak with your line manager in the first instance. If you would like to take your complaint further then please send this to us in writing. Your complaint will be passed to our Chief Executive and we will aim to resolve the matter as quickly as possible, usually within ten working days.

If you are unhappy with our response to your complaint then you are able to raise this with the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights.

Website: www.ico.org.uk
Phone: **0303 123 1113**

We are registered with the ICO as a Data Controller. Our registration number is: **Z5992036**

12. Changes to our Privacy Notice

We will occasionally need to update our Privacy Notice. We will advise you where possible when we do this but we please ask you to also check it periodically to make sure that you are aware of its contents and are happy with the implications with regards to your data.

You can check the latest version of our Privacy Notice online at:

www.headway-cambs.org.uk/privacy-notice

(Last updated: 21/05/2018)