



## **Employee Privacy Notice**

Under the UK General Data Protection Regulation and the Data Protection Act 2018 Christian Aid is required as an employer to give you a statement of our data policies and your rights. These are contained in this notice.

Under the regulations the Data controller is Christian Aid. Christian Aid is responsible for ensuring that it uses your Personal Data in compliance with data protection law.

This Employee Privacy Notice sets out the basis on which any Personal Data about you that you provide to Christian Aid, that Christian Aid creates, or that Christian Aid obtains about you from other sources, will be held.

The named Data Protection Officer is William Denton, Christian Aid Data Protection Manager.

Christian Aid collects and processes personal data relating to its employees to manage the employment relationship. Christian Aid is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does the Christian Aid collect?**

Christian Aid 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 Christian Aid;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- 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 sabbaticals, 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, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- details of trade union membership; and

- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Christian Aid collects this information in a variety of ways. For example, data is collected through the online e-recruitment system (in the form of application forms, CVs or resumes); 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.

Christian Aid seeks information from third parties with your consent only.

Data is stored in a range of different places, including in your electronic personnel file, in Christian Aid's HR management system Dayforce and in other IT systems (including Christian Aid's email system).

## **Why does Christian Aid process personal data?**

Christian Aid 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 benefits, pensions and insurance entitlements.

In some cases, Christian Aid 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, to enable employees to take periods of leave to which they are entitled, and to consult with employee representatives if redundancies are proposed or a business transfer is to take place. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

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

- run recruitment and redeployment 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 Christian Aid 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;
- conduct employee engagement surveys;

- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where Christian Aid relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

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 and for health and safety purposes). Information about trade union membership is processed to allow Christian Aid to operate check-off for union subscriptions.

Where Christian Aid processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that Christian Aid 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 will be shared internally, including with members of the People team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

Your data may also be shared with employee representatives in the context of collective consultation on a redundancy or business sale. This would be limited to the information needed for the purposes of consultation, such as your name, role and length of service.

Christian Aid shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. Christian Aid may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Christian Aid also shares your data with third parties that process data on its behalf, in connection with payroll, our e-recruitment provider, the provision of benefits and the provision of occupational health services.

In some limited circumstances your data may be shared in response to a formal and legitimate request from a governmental body or law enforcement agency.

Your data may be transferred to countries outside the European Economic Area (EEA) to fulfil certain employment obligations. Data being transferred outside of the EEA will be done so on the basis of an adequacy decision, model contractual clauses or another legitimate basis set out under the legislation.

## **How does Christian Aid protect data?**

Christian Aid takes the security of your data seriously. Christian Aid 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.

Where Christian Aid engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. This include our pension providers, payroll providers, childcare vouchers schemes, payroll attachment scheme. This list is not exhaustive.

## **For how long does Christian Aid keep data?**

Christian Aid will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are:

- 7 years for employed staff
- 6 years for consultant's contracts

Certain other data, such as information on pensions, may be held for a longer period. All retention periods are set out in full in the [Data Retention Policy](#).

## **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 Christian Aid to change incorrect or incomplete data;
- require Christian Aid to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Christian Aid is relying on its legitimate interests as the legal ground for processing; and
- ask Christian Aid to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Christian Aid's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Will Denton at [wdenton@christian-aid.org](mailto:wdenton@christian-aid.org). Internal staff may find out more [here on Subject Access Requests](#).

If you believe that the Christian Aid has not complied with your data protection rights, you can complain to the [Information Commissioners Office \(ICO\)](#).

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

You have some obligations under your employment contract to provide Christian Aid 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 Christian Aid 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 Christian Aid to enter a contract of employment with you. If you do not

provide other information, this will hinder the organisation'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.