

Policy and Procedure on Handling Staff's Personal Information

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Approval Date	September 2018
Next Review Date	September 2021
Version No	1
Policy Level	Group
Staff Groups Affected	All Staff

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1. Monitoring and Review

- 1.1. The Proprietor will undertake a formal review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than three years from the date of approval shown above,

or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

- 1.2. The local content of this document will be subject to continuous monitoring, refinement and audit by the Head of Service.



John Ivers
Proprietor, Cambian Group
September 2018



Paul Kniveton
Head of School
October 2020

2. Introduction

- 2.1 Cambian is committed to protecting and respecting your privacy. This policy (together with Cambian's Legal Notice and any other documents referred to on it) sets out the basis on which any personal data that you provide to Cambian, will be processed by Cambian. Your personal data is information which by itself or with other information available to us can be used to identify you, the data subject. By 'processing', we mean any activity that involves using your personal data. This includes collecting it, recording it, storing it, retrieving it, using it, amending it, disclosing it, destroying it, and transferring it to other individuals or organisations outside of the Cambian Group. Please read the following carefully to understand Cambian's views and practices regarding your personal data and how Cambian will treat it.

3. The Types of Personal Information that Cambian collects about staff

- 3.1. Personal information about staff is usually provided to Cambian by the individual employee. Personal information that the employee provided to other organisations may also be forwarded to Cambian (for example where the employee has agreed for us to obtain employment references on their behalf from a previous employer).
- 3.2. Cambian may collect and process the following data about you:
- Your name, address and contact details, including email address, telephone number, date of birth, gender, next of kin, emergency contacts
 - The terms and conditions of your employment or engagement
 - Details of your qualifications, skills, experience and employment or engagement history
 - Information about your pay, including pensions, life assurance etc.
 - Details of your bank and national insurance number
 - Information about your entitlement to work in the UK
 - Any relevant DBS information and your criminal record if appropriate
 - Details of your hours of work, annual leave, sickness, maternity, paternity, adoption leave, shared parental leave, sabbaticals, career breaks, unpaid parental leave
 - Details of any disciplinary or grievance procedures in which you have been involved including warnings and related correspondence
 - Information relating to probations, appraisals, performance reviews and training.
 - Information about medical or health conditions
 - Your nominated beneficiaries for life assurance purposes
 - Equal opportunities monitoring information
 - Your images whether captured by photograph or video

The reasons why Cambian collects your personal information.

4. The reasons why Cambian collects your personal information.

- 4.1. We process data to enter into an employment or engagement contract with you and to ensure that we are complying with our legal obligations. For example, we need to process your data to provide you with an employment or engagement contract, to pay you, deduct tax and administer any benefits due to you.
- 4.2. We are also required to check your right to work in the UK, ensure compliance with health and safety laws and enable you to take periods of leave which you are entitled to.
- 4.3. In other cases, we have a legitimate interest in processing personal data before, during and after the end of your employment or engagement. For example processing this data allows us to:
 - maintain accurate and up-to-date employment or engagement records and contact details (including details of who to contact in the event of an emergency), and records of your 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 your 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 you are receiving the pay or other benefits to which you are entitled;
 - obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that you are receiving the pay or other benefits to which you are entitled;
 - obtain medical certificates to support absence relating to sickness over seven consecutive days to ensure we pay you according to our sickness absence policy;
 - 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 we comply with our duties in relation to leave entitlement, and to ensure that you are receiving the pay or other benefits to which you are entitled;
 - ensure effective general HR and business administration;
 - provide references on request for current or former employees;
 - respond to and defend against legal claims;
 - provide information relating to TUPE transfers;
 - in connection with any sale, merger, acquisition; and
 - maintain and promote equality in the workplace.
- 4.4. As part of our business needs we collect visual images, personal appearance and behaviours through CCTV recordings to maintain the security of property and premises and for preventing and investigating crime. Where necessary or required,
- 4.5. This information is shared with the data subjects themselves, other employees and agents, services providers, police forces, security organisations and persons making an enquiry.
- 4.6. 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).
- 4.7. Where we process 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.

- 4.8. We will always make it clear where we need your permission to process your personal information. Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time, using the same method by which you gave us your consent originally.

5. What if you do not provide personal data?

- 5.1. You have some obligations under your employment or engagement contract to provide us with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters.
- 5.2. You may also have to provide us 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.
- 5.3. Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable us to enter a contract of employment or engagement with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment or engagement relationship efficiently.

6. Who will Cambian share your personal information with?

- 6.1. In fulfilling our business needs, we may share your information for any of the purposes mentioned at section 3 and 4, above. These are: (a) to perform the contract or contracts that we have with you (b) our legitimate business needs (c) to comply with a legal obligation (d) to carry out a task in the public interest (e) to protect someone's life; or (f) where we have your consent.
- 6.2. Specifically, your information will be shared internally, with human resources staff, payroll team, your line manager and other senior managers within the area in which you work and IT staff if access to the data is necessary for performance of their roles.
- 6.3. We may share your data with third parties where required by law, necessary to maintain or administer the employment or working relationship or there is a legitimate interest and your interests and fundamental rights do not override these obligations. For example this would apply in order to obtain pre-employment references from other employers, and obtain necessary criminal records checks from the Disclosure and Barring Service. We may also

share your data with third parties that process data on our behalf in the provision of benefits such as pensions, life assurance (e.g. Scottish Widows).

7. Transferring your personal information internationally

- 7.1. It may sometimes be necessary to transfer personal information overseas (outside of the United Kingdom). When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the General Data Protection Regulations and Data Protection Act.

8. The period for which we will keep your personal information

- 8.1. We will hold your personal data for the duration of your employment or engagement relationship with us.
- 8.2. In some circumstances, we are required by law to hold your personal data after your relationship with us has ended. For example, we are required by law to keep records relating to pay and tax for a period of 6 years after a person's employment or engagement has ended.
- 8.3. Please refer to our data retention schedule on Cambian Point. We will review our data retention periods for personal information on a regular basis. We also continually review the information that we hold, and delete anything that is no longer required.

9. How we keep your personal information safe and who has access to it

- 9.1. We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, unauthorised access, destruction or damage.
- 9.2. Personal information held by us electronically are stored on secure computer systems and we control who has access to them. Our staff receive data protection training and we have data protection policies and procedures in place which teams are required to adhere to.
- 9.3. Where we use external companies to collect or process personal data on our behalf, we undertake detailed checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or have access to.
- 9.4. Cambian's site may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that Cambian does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. Automated decision making and processing

- 10.1. Automated decision making involves processing your personal information without human intervention to evaluate your personal situation, such as your personal preferences, interests or behaviour. For instances, in relation to a

decision on whether to offer or end an employment relationship. All such decisions regarding your personal information are made by one of our employees. Decisions are therefore not made solely by automated devices.

11. Your Data Protection Rights

11.1. Under certain circumstances, by law you have the right to:

- **Request information about whether we hold personal information about you**, and, if so, what that information is and why we are holding/using it.
 - **Request access to your personal information (commonly known as a "data subject access request")**. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - **Request correction of the personal information that we hold about you**. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request erasure of your personal information**. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - **Object to automated decision-making** including profiling, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
 - **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
 - **Withdraw consent**. In those circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 11.2. If you want to exercise any of these rights, then please email the **Data Protection Officer: DPO@cambianguroup.com** or by post to: **Cambian Group, 4th Floor, Waterfront Building, Hammersmith Embankment, London W6 9RU**,
- 11.3. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 11.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. IP addresses and cookies

- 12.1. Where you use personal electronic devices to access our website, Cambian may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. Cambian may also obtain information about your general internet usage by using a cookie file which is stored on the

hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help Cambian to improve Cambian's site and to deliver a better and more personalised service. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of Cambian's site. Unless you have adjusted your browser setting so that it will refuse cookies, Cambian's system will issue cookies when you log on to Cambian's site.

13. Changes to Cambian's privacy policy

13.1. Any changes Cambian may make to Cambian's privacy policy in the future will be posted on this page.