



## Employee privacy notice (compliant with the GDPR)

This privacy notice gives staff employed by the Bristol Diocesan Board of Finance Ltd (DBF) information about how their personal data will be used.

This notice applies to all those who hold a DBF contract of employment and extends to temporary workers and volunteers.

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), which will come into effect in the UK on 25 May 2018.

|                                |   |
|--------------------------------|---|
| <b>Data controller</b>         | Bristol Diocesan Board of Finance Ltd<br>Hillside House<br>Stoke Gifford<br>Bristol<br>BS34 8YU<br>Tel. 0117 906100 |
| <b>Data protection officer</b> | Director of Finance   |

### 1.0 Reasons for holding personal data

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

### 2.0 What information does the DBF collect?

The DBF 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 DBF;
- 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, working hours and work location) 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 Diocese needs to make reasonable adjustments;
- details of trade union membership, or membership of professional bodies;
- details of your car insurance arrangements if undertaking travel for work, and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The DBF collects this information in a variety of ways. For example, data is collected through 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 tax forms); from correspondence with you; or through interviews, meetings or other assessments.

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

### **3.0 Where is data stored**

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

### **4.0 Why does the DBF process personal data?**

The DBF 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 pension and insurance entitlements.

In some cases, the DBF 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. 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, the DBF has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the DBF 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 the DBF 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 or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the DBF 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, are processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).



Where the DBF 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 the DBF 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.

## **5.0 Who has access to data?**

Your information will be shared internally, including with members of the HR team, payroll, your line manager, Senior managers in the Team in which you work and IT staff if access to the data is necessary for performance of their roles.

The DBF 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.

The DBF also shares your data with third parties that process data on its behalf in connection with payroll, the provision of pensions and the provision of occupational health services.

The DBF may also share your data (email and phone number) with the IT Service Desk, (National Church Institutions) to set up your laptop and shared file access.

The DBF will not transfer your data to countries outside the European Economic Area.

## **6.0 How does the DBF protect data?**

The DBF takes the security of your data seriously. The DBF 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 the DBF engages third parties to process personal data on its behalf, it does so on the basis of written instructions, is under a duty of confidentiality and is obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **7.0 For how long does the DBF keep data?**

The DBF will hold your personal data for the duration of your employment. The period for which your data is held after the end of employment is usually 6 years.

## **8.0 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 the DBF to change incorrect or incomplete data;
- require the DBF 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 the DBF is relying on its legitimate interests as the legal ground for processing; and
- ask the DBF to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the DBF's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Staff Leadership Team Personal Assistant. You can make a subject access request by completing the DBF's form for making a subject access request.

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

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

You have some obligations under your employment contract to provide the DBF 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 the DBF 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 the DBF to enter a contract of employment with you. If you do not provide other information, this will hinder the DBF's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

## **10.0 Automated decision-making**

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

## **11.0 Law relating to this document**

- General Data Protection Regulation (2016/679 EU)
- The Data Protection Bill, which will repeal and replace the Data Protection Act 1998, is currently being considered by Parliament.