

Ely Diocesan Board of Finance

Privacy Notice for Employees and Volunteers

Date: 7 November 2024

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Data Controller

Ely Diocesan Board of Finance of Bishop Woodford House, Barton Road, Ely, CB7 4DX.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our employees and volunteers, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former employees, volunteers, workers and contractors.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

1. processing is fair, lawful and transparent
2. data is collected for specific, explicit, and legitimate purposes
3. data collected is adequate, relevant and limited to what is necessary for the purposes of processing
4. data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
5. data is not kept for longer than is necessary for its given purpose
6. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

B) TYPES OF DATA HELD

We keep several categories of personal data on our employees in order to carry out effective and efficient processes. For Diocesan employees we keep this data in a personnel file relating to each employee and we also hold the data within our computer systems, for example, our holiday booking system. We hold limited amounts of personal data on volunteers, as applicable to your role.

We hold the following types of data, including but not limited to:

- personal details such as name, address, phone numbers
- name and contact details of your next of kin
- your photograph
- right to work documentation
- information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter
- references from former employers
- details on your education and employment history
- National Insurance numbers
- bank account details
- tax codes

- information relating to your employment with us details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
- information on time off from work
- IT equipment use including telephones and internet access.

We will also process the following special categories of data:

- Details of disability to allow reasonable adjustments to be made
- Sickness records
- Religious beliefs where the role requires it.

Most commonly, we will process special categories of data when the following applies:

1. you have given explicit consent to the processing
2. 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
3. we must process data for reasons of substantial public interest
4. you have already made the data public
5. processing is carried out in the course of our legitimate activities as a not-for-profit body with a religious aim.

If your role requires that you undergo a DBS check, we will only hold the information that you have undergone one and any information relevant to safeguarding. We do not routinely process data relating to criminal convictions.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Personal data is kept in files or within the Company's HR and IT systems.

D) PURPOSES OF THE PROCESSING AND LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only.

Ely Diocesan Board of Finance collects and processes personal data relating its employees to manage the employment relationship.

Ely Diocesan Board of Finance needs to process personal data to enter into an employment contract with the employee and to meet its obligations under the employment contract. Such obligations include:

- maintaining accurate and up-to-date employment records, contact details, and records of employee contractual and statutory rights;
- administering payroll in accordance with employment contracts;
- reimbursing expenses that employees have incurred;
- keeping a record of annual leave, sick leave and other types of leave, to allow effective workforce management, and to ensure that employees are receiving the pay or other benefits to which they are entitled; keeping a record of employee performance and related processes, for workforce management purposes;
- keeping records of training and development requirements;
- providing references on request for current or former employees;
- ensuring effective general HR and business administration.

In some cases, Ely Diocesan Board of Finance needs to process data to ensure that it is complying with its legal obligations. Such obligations include:

- checking an employee's entitlement to work in the UK;
- carrying out DBS checks to identify any convictions, both spent and unspent, cautions, warnings and reprimands;
- deducting tax and providing details to the HMRC;
- complying with health and safety laws.

Some special categories of personal data, such as data about health or medical conditions, are processed to carry out employment law obligations.

E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

F) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

- Payroll processing
- Pension providers
- Regulatory authorities, e.g. HMRC
- Church bodies for the Diocese to carry out its business purposes and legal obligations
- Volunteers who assist the Diocese in its work.

Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

G) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

H) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Recommended Retention Period
Job applications and interview records	6 months after the appointment.
Personnel records including, annual performance assessments, disciplinary matters, job descriptions, training and termination documentation.	6 years after employment ceases.

Personnel records relating to employees with contact with children including, annual performance assessments, disciplinary matters, job descriptions, training and termination documentation.	Indefinitely after employment ceases.
Contracts of employment and changes to terms and conditions.	6 years after employment ceases.
Annual Leave Records	2 years after the leave is taken.
Expenses Claims	6 years after the claim.
PAYE and National Insurance Records	6 years plus the current year.

I) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

J) EMPLOYEE RIGHTS

You have the following rights in relation to the personal data we hold on you:

1. the right to be informed about the data we hold on you and what we do with it;
2. the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests;
3. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
4. the right to have your data erased in certain circumstances. This is also known as 'the right to be forgotten';
5. the right to restrict the processing of the data;
6. the right to transfer the data we hold on you to another party. This is also known as 'portability';
7. the right to object to the inclusion of any information;
8. the right to regulate any automated decision-making and profiling of personal data.

If you wish to exercise any of the rights explained above, please contact the Data Protection Manager, Sheena Bridgman, on sheena.bridgman@elydiocese.org or telephone 01353 652703.

K) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

L) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

M) DATA PROTECTION COMPLIANCE

Our Data Protection Team can be reached on data.protection@elydiocese.org or by telephone on 01353 652703.