

CLIENTS

If you use any of our services

What we collect and how we use your information

When engaging with our services there will be some personal information which we need to collect in order to offer you the best possible support. As each service requires different information you will receive a printed privacy notice which will explain:

- What information we need to collect
- The legal reason we collect this and why we need it
- How long we will hold onto your data after you've left the service
- How you can exercise your data protection rights.
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Our legal bases for collecting you information

Depending on the service we will collect your information under one or more of the following legal bases:

- **Consent** – we will use this where we can offer you a choice as to whether or not we collect, store, share or otherwise process your information. This will be made clear to you, and will not be done unless we have your consent.
- **(Substantial) Public Interest** – where we are working to assist with public law we will collect your information under public interest. We will be clear about why we have to collect this information, how it will be used, who you can expect it to be shared with and why.
- **Contract** – in some cases we need to collect information in order to fulfil a contract, this will generally be when you have a licence agreement with us.
- **Legitimate Interest** – we may collect other information about you which we believe will assist you when you are with us. This will be used to ensure you are receiving tailored and specific support around your needs.

If you have any objections to these types of processing, you can contact the Deputy Director.

Sharing your personal information

We may need to share some of your information, and we will always take appropriate precautions before doing so. If there are parties we share with regularly, their details will also be provided in your privacy notice, along with a reason for doing so.

Where we do not **need** to share information, we will always ask for your consent. We do this to respect your right to have a control over your data, and where it is going.

Questions about your data

If you have any questions please speak to the Deputy Director.

If you currently or have previously used one of our services and would like to understand or exercise your data protection rights, you can also contact the Deputy Director.

How long do we keep your information for?

We will keep your data for a period of 10 years, after you have left the service. Your data will then be minimised and only the following information will be kept:

- Your name and date of birth to identify you should you re-engage with our services in the future.
- A list of the services you engaged with including dates of entry and exit, again this would be able to help us better support you should you re-engage.

In some exceptional cases we may have to keep additional information. This will only be done if there were any significant risks to other clients, staff or property which we'd need a record of should you re-engage.

This information will only be kept for a maximum of 10 years after you have left the service.

STAFF AND APPLICANTS

What information we collect

Personal data, or personal information, means any information about an individual from which that person can be identified.

There are “special categories” of more sensitive data which require a higher level of protection.

We will collect, store and use the following categories of personal information about you:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- recruitment documents for roles that you have held, including application, interview notes, shortlisting information, tests and references;
- details of your qualifications, professional memberships, skills, experience and employment history, including start and end dates and work locations, with previous employers and with the organisation;
- information about any potential conflicts of interest;
- 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 status to drive;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary, capability or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- details of any safeguarding concerns or referrals made to the Disclosure and Barring Service (DBS);
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- supervision and other management notes in relation to the performance of your role;



- information related to health and safety claims, accidents, complaints incidents which you may be party or a witness to;
- feedback you have provided for others through our performance management processes;
- information about your use of Crawley Open House information and communications systems;
- photographs
- CCTV footage

We may also collect, store and use the following “special categories” of more sensitive personal information:

- information about your criminal record;
- information about your nationality and entitlement to work in the UK;
- details of periods of sickness absence taken by you, and the reasons for the leave;
- details of attendance and sickness procedures in which you have been involved, including any stages of the process you have reached and 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.

Our legal bases for collecting your information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a **legal obligation**.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment, for example, in order to administer certain benefits, such as pensions schemes, life insurance or critical illness insurance.
- Where it is needed in the public interest, such as equal opportunities monitoring or reporting safeguarding concerns.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

How we collect your personal information

We collect 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; from correspondence with you; or through interviews, meetings or other assessments.



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In some cases, the organisation collects personal data about you from third parties, such as references supplied by former employers; recruitment agencies; assessment information provided by assessment providers; medical information provided by medical professionals and information from criminal records checks permitted by law.

We will collect additional personal information in the course of job-related activities throughout the period of you working with us.

How we use your personal information

We need all the categories of information in the list above primarily to allow us to adhere to our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- Running recruitment processes and making decisions about pay and terms.
- Checking you are legally entitled to work in the UK and you are suitable for the role that you are engaged to conduct.
- Maintaining 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.
- Paying you and deducting tax and National Insurance contributions.
- Administering benefits.
- Gathering evidence in relation to and operating and keeping a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- Gathering evidence in relation to and operating and keeping a record of employee performance and related processes, to plan for career development, and workforce management purposes.
- Operating and keeping 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.
- Obtaining occupational health advice, appropriately, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled.



- Operating and keeping 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 organisation 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.
- Complying with health and safety obligations.
- Ensuring effective general HR and business administration.

- Ensure effective business management, monitoring and planning activities.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies and effective discharge of your duties.
- To provide references on request for current or former employees.
- Responding to and defending against legal claims.
- Maintaining and promoting equality in the workplace.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

How we use your sensitive information

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to your nationality in order to ascertain your right to work in the UK.
- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical and mental health, or disability status, to ensure your health and safety in the workplace and assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.



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Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our policies in relation to Pre- Employment Checking and Employing People with Criminal Records.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with appropriate safeguards.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use the information about criminal convictions and offences in the following ways:

- To ascertain your suitability (on an ongoing basis) for your role and employment at Crawley Open House.
- To inform any appropriate discussions or processes in line with our Code of Conduct and Disciplinary Procedures.

We are allowed to use your personal information in this way to carry out our duties as an employer working in fields with regulated activity and/or with vulnerable adults and/or children and/or in line with the requirements of the Rehabilitation of Offenders Act. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

Sharing your information

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.



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Who we share with

“Third parties” include third-party service providers (including contractors and designated agents).

We share your data with third parties that process data on our behalf, in connection with insurances and legal advice, employee relations matters, payroll, the provision of benefits and the provision of occupational health services.

Keeping your information secure

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. With the exception of our occupational health provider (who uses your data for the purposes of advising you directly and safeguarding your wellbeing) we do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Keeping your information secure

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, altered, misused or disclosed, and is not accessed except as required by its employees in the performance of their duties. We operate under a suite of Data Protection Policies, a Data Retention Schedule and restrict access to our systems and files appropriately.

Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions and only where the third party has agreed to treat the information confidentially and to implement appropriate technical and organisational measures to ensure the security of data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



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How long we keep your data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use of disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



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VOLUNTEERS

What information we collect

When you volunteer with Crawley Open House, we collect a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your, skills, experience and motivations for volunteering
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information about your criminal record;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief; and

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents.

We will also collect personal data about you from third parties, such as references supplied by former employers, educational / training establishments, work experience providers or other appropriate referees as provided by yourself and information from criminal records checks.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why we collect and process this data

We need to process data to administer your volunteering application and we have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from volunteer applications allows us to manage the recruitment process, assess and confirm a potential volunteer's suitability for the role you have applied for.

Where we rely 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 volunteers and has concluded that they are not.

We process health information to see if reasonable adjustments can be made to support a potential volunteer's application.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, we are obliged to seek information about criminal convictions and offences.

Where we seek this information, we do so because it is necessary for it to carry out its obligations and exercise specific rights in relation to that volunteering role.

Following the conclusion of any recruitment exercise, we will keep your personal data on file for 10 years to respond to any questions about the process.

Who else has access to this data

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the Volunteering team, volunteer supervisors in the service where the role is based and IT staff and business insight teams if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application to volunteer is successful. We will then share your data with relevant individuals and organisations (provided by yourself) to obtain references for you, and the Disclosure and Barring Service to obtain necessary criminal records checks.

Keeping your information secure

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, altered, misused or disclosed, and is not accessed except as required by its employees in the performance of their duties. We operate under a suite of Data Protection Policies, a Data Retention Schedule and restrict access to our systems and files appropriately.

Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions and only where the third party has agreed to treat the information confidentially and to implement appropriate technical and organisational measures to ensure the security of data.



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We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long we keep your data

If your application to volunteer is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process.

If your application to volunteer is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your volunteering. The periods for which your data will be held will be provided to you in a new privacy notice.