

How CCCR uses staff personal data (fair processing notice)

About this notice

CCDR needs to collect and process staff personal data in order to function effectively as an organisation. Personal data is processed for a variety of reasons (as set out below) and all such personal data will be collected and processed in accordance with the requirements of the General Data Protection Regulation (**GDPR**) and the Data Protection Act 2018.

This notice explains how CCCR collects, uses and shares personal data relating to prospective, current and former employees, workers, self-employed contractors and consultants, voluntary workers, and honorary and associate staff (you/your) and your rights in relation to the processing of your personal data.

In this notice:

- **personal data** means any data which can identify you directly or indirectly (whether itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **processing** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

CCDR is a 'controller' in relation to your personal data.

CCDR may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes, however where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights (see below), you should contact our Data Protection Officer by email at administration@cc-dr.org

How we collect your personal data

Most of the personal data set out in this notice will have been provided by or observed about you in the course of the application and recruitment process or during the course of your working relationship with **CCDR**.

CCDR may sometimes collect personal data about you from third parties including:

- your CV from any recruitment agencies that were authorised by you to approach regarding a position
- references from former employers, colleagues or other relevant parties
- information collected as a result of formal background checks, e.g. DBS checks
- other relevant information in the public domain

Types of personal data processed

Depending on your role, this notice sets out the types of personal data that **CCDR** may collect and process about you, including "special categories of personal data" which are particularly sensitive and require us to take additional steps to ensure their security and confidentiality.

Personal data provided by you about others

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to **CCDR** as your listed next of kin/emergency contact.

How CCDR uses personal data about you

Depending on your role, **CCDR** may process personal data (including special categories of personal data) about you for the following purposes:

- the administration of prospective, current and past employees including self-employed, contract personnel, temporary staff or voluntary workers, and work overseas
- the recruitment and selection process
- the administration of payroll services
- planning and management of **CCDR's** workload or business activity
- occupational health service
- administration of agents or other intermediaries
- pensions administration
- disciplinary matters, staff disputes, employment tribunals
- staff training and development
- ensuring staff are appropriately supported in their roles
- vetting checks
- assessing **CCDR's** performance against equality objectives as set out by the **Equality Act 2010**

Lawful grounds for processing your personal data

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

- **to perform a contract** **CCDR** has entered into with you or take steps before entering into a contract with you at your request (for example, your employment contract or contract for services)
- **to comply with CCDR's legal obligations** (for example, complying with employment and tax, immigration, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations)
- **where necessary for our legitimate interests** or those of a third party provided your interests and rights do not override those interests (for example, evaluating the suitability of a candidate for a role or defending employment claims brought by you)
- **to protect your vital interests** or those of another person (for example, where we know or have reason to believe that you or another person may suffer harm)

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

Sharing your personal data with third parties

Where **CCDR** has lawful grounds for doing so, we may share your personal data with the following third parties:

- visas and Immigration
- tax authorities, social security and superannuation schemes
- pension schemes as set out in the scheme rules
- research sponsors/funders
- potential employers (where a reference is requested)
- child Maintenance Service as required
- official auditors
- insurance providers
- law enforcement agencies

Where **CCDR** uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent or the disclosure is otherwise made in accordance with data protection law.

Please note that we may need to share your personal information with a regulator or to otherwise comply with the law, and the list above is not necessarily exhaustive.

Where your personal data are stored

Your personal data may be held in hard copy files stored in secure locations.

How CCDR keeps your personal data secure

CCDR has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, **CCDR** limits access to your personal data to the persons and organisations, including those described above, who have a lawful and legitimate need to access it.

CCDR has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

How long CCDR will retain your personal data

CCDR must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, **CCDR** has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from **CCDR's** continued retention of the personal data
- the purposes for which **CCDR** may process your personal data
- whether **CCDR** is required to retain any personal data by law or in accordance with its legitimate interests

Generally speaking, all relevant correspondence in relation to your employment or engagement will be held by Human Resources and retained for six years after you have left **CCDR** or your engagement has ceased, after which time it will

be securely disposed of. Basic information about your employment or engagement (appointment, dates of service etc) will be retained indefinitely.

In some cases, **CCDR** may anonymise your personal data so that it can no longer be identified with you, in which case we may retain such data indefinitely.

If notice of a claim or Pre-Action or Early Conciliation correspondence is received, then we may retain and process relevant personal data to defend the claim for the duration of the proceedings. Whilst we may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed or evidence given may be a matter of public record.

Your responsibilities

You must ensure that any personal data collected and processed by you in the course of performing your duties and obligations is held in accordance with **CCDR's Data Protection Policy**.

Members of staff are able to notify **CCDR** of any change to their contact details via Human Resources. It is important **CCDR** has an accurate record of staff details in case there is a need to make contact with staff in emergency circumstances.

Your rights

You have a number of rights in relation to the processing of your personal data by **CCDR**:

- **Access:** You have the right to request access to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that **CCDR** is processing it lawfully and fairly.
- **Correction:** You have the **right to request correction** of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the **right to request erasure** of any personal data held about you where there is no good reason for **CCDR** to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the **right to request restriction** of how **CCDR** processes your personal data; for example, to confirm its accuracy or for **CCDR's** reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the **right to object** to **CCDR's** processing of any personal data which is based on the legitimate interests of **CCDR** or those of a third party based on your particular circumstances. You also have the right to object to **CCDR** processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or request that **CCDR** transfers a copy of your personal data in an electronic format where the basis of **CCDR** processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the Information Commissioner's Office (ICO) or any other EU supervisory authority in relation to how **CCDR** processes your personal data.

To exercise any of these rights you must contact the **CCDR's** Data Protection Officer at (insert email). **CCDR** may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly. Where the lawful ground relied upon by **CCDR** to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, **CCDR** may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though **CCDR** may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data **CCDR** may ask you to verify your identity before fulfilling any request in relation to your personal data.