



Community Security Trust **EMPLOYEE, STAFF AND CONTRACTOR PRIVACY NOTICE**

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1. Introduction

This privacy notice outlines how Community Security Trust ("CST") may use personal information relating to employees and contractors (referred to collectively as "workers").

CST is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers, and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2. Controller

CST is the data controller and is responsible for your personal data.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

3. The data we process about you

CST collects personal information about its workers for legal, personnel, administrative and management purposes to legitimately manage its business, control costs and effectively implement its policies and procedures, and to enable us to meet our legal obligations as an employer.

The term "personal information" in this notice refers to information that does or is capable of identifying you as an individual, for the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation [Regulation [EU] 2016/679] [the "GDPR"]).

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Demographic information such as date and location of birth, gender, nationality, education/work history, academic/professional qualifications, employment details, hobbies, any family dependences.
- Next of kin and emergency contact information.
- Financial information including National Insurance number, bank account details, payroll records, tax status information, salary, annual leave, pension and benefits information.
- Start date and, if different, the date of your continuous employment.
- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Performance information.
- Disciplinary and grievance information.
- CCTV footage used for crime prevention and monitoring safety of our workers.
- Photographs.
- Details of any incidents and/or accidents.

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records, including:
 - Where you leave employment and the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
 - Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave;
- and
- Where you leave employment and the reason for leaving is related to your

health, information about that condition needed for pensions and permanent health insurance purposes.

- Information about criminal convictions and offences.

4. How is your personal data collected?

We collect personal information about workers through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, or referees.

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

5. How we will use data about you

We use your personal information to allow us to perform 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.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs).
- Providing any benefits which form part of an employee's contract of employment, including but not limited to pension schemes.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.

- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.
- Any spent or unspent criminal

convictions to assess your suitability for a job or volunteering role.

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

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE SENSITIVE PERSONAL INFORMATION

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

- 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 or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance.
- We will use information about your race or 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 CCTV footage to monitor the safety of our workers.

DO WE NEED YOUR CONSENT?

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.

INFORMATION ABOUT CRIMINAL CONVICTIONS

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 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 or volunteering for us.

6. Who do we share your personal data with?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers (including contractors and designated agents) performing functions on our behalf under contract, and who support our systems, operations and processes. For example, the following activities may be carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services.

We may also share your personal data with the following:

- Tax, audit or other authorities when we believe in good faith that the law or other regulation requires us to share this information.
- Law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax.
- Business transfer; where we merge with or are acquired by another charity in the future, we may share your personal information with the (prospective) new charity.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

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.

7. Data Retention

HOW LONG WILL YOU USE MY INFORMATION FOR?

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 or 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, volunteer, worker or contractor of CST we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

8. Your rights

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from.
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated.
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest).
- The right to object to the processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within one calendar month of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request.

To exercise your rights please write to:

Compliance Officer, CST, Shield House
Harmony Way, London, NW4 2BZ
Or email compliance@cst.org.uk

9. Transferring information outside the EU

We will not transfer your personal information outside the European Economic Area (EEA) but our website is accessible from outside of the UK/EEA.

10. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

11. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

12. Complaints

If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Switchboard: 01625 545 700

Data Protection Help Line: 01625 545 745

We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

13. Your obligations

As part of their role, some workers will be processing personal information, such as incident reports and CCTV footage. As such, when processing any personal information, you are obliged to comply with the following:

- You must only act on the instructions of CST, the data controller;
- You will only process the personal information in accordance with applicable data protection laws;
- You understand that you are subject to a duty of confidence and are aware of the confidential nature of the personal information;
- You warrant that you will not make public any personal information that you process;
- You will not engage any subcontractors or sub-processors without the prior written consent of CST;
- You will not transfer any personal information to a country or territory outside the European Economic Area;
- You will immediately notify CST if you become aware of any data breach; and
- You will only disclose or permit disclosure of the personal information to CST- authorised third-party service providers.



WEBSITE www.cst.org.uk



FACEBOOK **Community Security Trust**



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