

PRIVACY NOTICE FOR EMPLOYEES, VOLUNTEERS, TRUSTEES, AND JOB APPLICANTS

United Kingdom for UNHCR (UK for UNHCR) collects and processes your personal data where you are an employee or a trustee, if you volunteer for us, or if you make an application to join us. We only process the data necessary to manage our relationship/potential relationship.

This Notice provides information on how we collect and use your personal data where you are an employee, trustee, volunteer for us, or when you make a job application to join us. We are committed to being transparent about how we collect and use your data.

For the purposes of this privacy notice UK for UNHCR are also referred to as 'we, us, our, employer'. Where we refer to 'your employment' we mean where you are an employee. Where we refer to "your volunteering" we mean where you are a trustee or a volunteer for us.

As an employer we collect, use and are responsible for certain personal information about you. When processing data about you we must comply with the obligations placed on us by the Retained General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA18). UK for UNHCR is the data controller and is committed to ensuring that your personal data is processed in accordance with those obligations.

What information does UK for UNHCR collect?

UK for UNHCR collects and processes a range of information about you throughout the course of your relationship with us. This includes information you provide to us during the course of the application process and information we collect during your employment or volunteering with us. 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/role within the organisation;
- details of your qualifications, skills, experience, training and employment history;
- information about your remuneration, including entitlement to benefits;
- payroll data, including 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;
- a copy of your ID (i.e. passport or driving licence);
- details of your schedule (days of work and working hours) 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; This may include special category health data contained in sickness records.
- 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, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments; and

- equal opportunities monitoring information;

We may collect this information in a variety of ways including directly from you or from third parties.

The ways we collect your data directly from you include; through application forms or CVs; obtained from your passport or other identity documents; from forms completed by you at the start of your employment or volunteering, information collected during the application process, employment or volunteering; from correspondence with you; through interviews, meetings or other assessments; through your activities in the course of your employment or volunteering, such as through your performance evaluations; via monitoring activities.

If you feel it is appropriate, you may supply a digital version of your signature to be used when required. Any use of your digital signature would be pre-approved by you each time.

In some cases, we may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records check where we have a legal basis.

Data will be stored in a range of different places, including in your personnel file, in our HR management systems including Breathe HR and/or in other IT systems (including the email system).

If you provide us with personal data about members of your family and/or dependents or beneficiaries (e.g., for emergency contact or benefits administration purposes), it is your responsibility to inform them of their rights with respect to such information. You also are responsible for obtaining the explicit consent of these individuals (unless you can provide such consent on their behalf) to the processing (including transfer) of that personal data for the purposes set out in this Notice.

Why does UK for UNHCR process personal data?

UK for UNHCR needs to process data prior to entering, or to enter into an employment contract or volunteer agreement with you in order for us to meet our obligations under your employment contract / other agreement. For example, we need to process your data to provide you with an employment contract or volunteer agreement in order to manage your role, or to pay you in accordance with your employment contract and to administer benefit entitlements (where applicable), or to reimburse you for any accrued expenses. We may need to register trustees of the charity with external organisations including private sector partners, accreditation bodies or for the purpose of entering into service agreements, for example with financial institutions, donation platforms or processors such as PayPal and GoCardless.

We may use your data to assess your skills, qualifications and suitability for a role with us, to carry out background checks and seek references where applicable, to communicate with you about the recruitment process, and to keep records related to our employees, trustees and volunteers once you have joined us.

In some cases, we need to process data to ensure that we are complying with our legal obligations under applicable law, regulations, collective agreements or other contracts. 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.

In other cases, UK for UNHCR has a legitimate interest in processing personal data before, during and after the end of the employment/ to fulfil its business needs. Processing your data allows us to:

- run recruitment processes;
- maintain accurate and up-to-date employment/Trustee/volunteer records and contact details (including details of who to contact in the event of an emergency), and records of your contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace and while you are representing us;
- operate and keep a record of employee performance and related processes, to plan for career development, and for workforce / volunteer 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 we comply with our duties in relation to individuals with disabilities, meet our obligations under health and safety law, and make reasonable adjustments where necessary. Also to 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 we comply 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; and
- respond to and defend against legal claims.

In addition, UK for UNHCR has a legitimate interest in processing personal data before, during and after the end of volunteering to fulfil its business needs. Processing Trustee and/or volunteer data allows us to:

- establish and maintain effective governance;
- meet statutory obligations for publishing and sharing governors'/trustees' details;
- enable payments of incurred expenses
- enable appropriate organisational contact (for example, lists of Trustees for both internal and external use);
- allow for delegated financial authority (for example, cheque signing, bank mandates, contract signing);
- facilitate safe appointment of Trustees, as part of our safeguarding obligations towards pupils;
- ensure effective business administration;
- provide references on request for current or former Trustees; and
- respond to and defend against legal claims.

Legal basis for processing personal data

Where we process your personal data we ensure we have a legal basis under Article 6 of the UK GDPR to do so. Our lawful bases for the processing described in this Notice include;

- UK GDPR Article 6(1)(a) you have given your consent to the processing
- UK GDPR Article 6(1)(b) the processing is necessary for the performance of a contract (or prior to entering into a contract).
- UK GDPR Article 6(1)(c) the processing is necessary for compliance with a legal obligation to which we subject
- UK GDPR Article 6(1)(d) where the processing is necessary to protect your vital interests (or someone else's interests).
- UK GDPR Article 6(1)(f) the processing is necessary for the purposes of our legitimate interests. Our legitimate interests include our requirements to use your data in litigation or for other legal purposes involving us and/or any affiliate of UK for UNHCR and for purposes already detailed above.

Where we process your special category data, we ensure we have also have a lawful basis under Article 9 of the UK GDPR, and where necessary ensure we have a condition for processing under the DPA 18. Our lawful bases are:

- UK GDPR Article 9(2)(a) where you have given explicit consent to the processing of those personal data for one or more specified purposes.
- UK GDPR Article 9(2)(b) where processing is necessary for us to comply with our obligations as an employer.
- UK GDPR Article 9(2)(c) if processing is necessary to protect the vital interests of yourself or another person.
- UK GDPR Article 9(2)(h) where processing is necessary for the purposes of preventive or occupational medicine and assessing your working capacity as an employee.

Where we process your special category data under Article 9(2)(b) and Article 9(2)(h) a condition from Schedule 1 of the DPA 2018 is also required as detailed in our Appropriate Policy.

What if you do not provide personal data?

You have some obligations under your employment contract to provide UK for UNHCR 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 UK for UNHCR with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable UK for UNHCR to enter a contract of employment with you.

Who has access to data?

Your information will be disclosed only to individuals, affiliated companies or third parties who need to access your personal data to perform the duties listed above or where required or permitted by applicable law.

Your information may be shared internally, including with your line manager, managers in the business area in which you work and Finance and IT staff if access to the data is necessary for performance of their roles.

We share 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, if applicable to your role. We may share your data with third parties in order to obtain references upon your appointment, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service, if applicable to your role as a Volunteer.

We may also share your data with third parties for the provision of services, including seeking professional advice i.e. relating to employment matters. In such circumstances the data will be subject to confidentiality arrangements. We also share your data with third parties that process data on our behalf in connection with payroll, HR, and the provision of benefits.

We will exercise appropriate due diligence in the selection of third party service providers, and require that such providers maintain adequate technical and organisational security measures to safeguard your personal data, and to process your personal data only as instructed by us and for no other purposes.

We may also disclose your personal data to governmental authorities as required or permitted by law.

International transfers

In limited and necessary circumstances, your personal information may be transferred outside of the UK. Where such transfers occur, we will ensure that there are suitable safeguards and transfer mechanisms in place to adequately protect your data.

How does UK FOR UNHCR protect data?

UK for UNHCR takes the security of your data seriously. We maintain physical, technical, and organisational security measures to protect your data against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access. We have 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 authorised employees in the performance of their duties. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does UK FOR UNHCR keep data?

UK for UNHCR intends to keep your data accurate and up-to-date. We also strive to retain your data for no longer than is necessary to carry out the purposes listed in this Notice or than is required by law. We may retain employee data for up to seven years following the end of your employment or volunteering, and up to 20 years following the end of your Trusteeship, although certain records may be kept for shorter periods, such as:

- If your application for employment is unsuccessful, after the end of the relevant recruitment process, we will hold your data on file for six months if you do not consent to us contacting you regarding other job opportunities, and for twelve months if consent is provided.
- Pay records – six years
- Working time records – six years
- Sickness absence records – six years

- Family leave records – six years
- Health and safety records – five years

Data Subject Rights

You have a number of rights which may be available in relation to your data as detailed below. Please note your rights may be limited and subject to restrictions in certain situations.

Your rights are:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights related to automated decision-making including profiling

You can also find more information on the [ICO website](#).

If you would like to exercise any of these rights or have any questions, please contact Senior Operations Manager. If you believe that UK for UNHCR has not complied with your data protection rights, you can complain to the UK supervisory authority, the Information Commissioner's Office.

Automated decision-making

Employment and volunteering and recruitment process related decisions are not based solely on automated decision-making.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. It is your responsibility to keep us informed of any changes to your personal data during your working/volunteering relationship with us.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time and will inform you to revisit this notice when we make any substantial updates. Should we materially change our personal data practices or this Notice, we will issue a revised Notice and/or take other steps to notify you of the changes in accordance with applicable laws.

Contact Details

Address: United Kingdom for UNHCR, WeWork, 1 Mark Square, London, EC2A 4EG

Email: hr@unrefugees.org.uk

Telephone: 0203 761 8094