**Privacy Notice Home-Start Dunfermline**

At Home-Start Dunfermline we are committed to protecting and respecting your privacy.

This Privacy Notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information.

Any questions regarding this notice and our privacy practices should be sent by email to admin@hsdunfermline.co.uk or by writing to Home-Start Dunfermline, 41 Bruce Street, Dunfermline, KY12 7AG. Alternatively, you can telephone 01383 621349.

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**Who are we?**

Home-Start Dunfermline is committed to protecting your personal information and to being transparent about what information we hold. Home-Start Dunfermline understands its obligations to you to help you understand how and why we process your personal data. We will only do so in accordance with all applicable UK data protection legislation, including the General Data Protection Regulation. In this notice ‘Home-Start’, ‘we’, ‘us’ or ‘our’ means:

* Home-Start Dunfermline is a charitable company limited by guarantee.
* Company no. SC280849
* Charity no. 006806 Registered office: 41 Bruce Street, Dunfermline, KY12 7AG

**The personal data we collect from you, how we collect and how we use it**

## Your Rights

Under UK data protection law, you have certain rights over the personal information that we hold about you. Here is a summary of the rights that are likely to apply to you when we are processing your personal information. we think apply:

## *Right of access*

You have a right to request access to the personal data that we hold about you.

You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

If you want to access your information, please contact the address provided below, telephone or e-mail

## *Right to have your inaccurate personal information corrected*

You have the right to have inaccurate or incomplete information we hold about you corrected. The accuracy of your information is important to us so we're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or if you believe any of the other information we hold is inaccurate or out of date, please contact us via email, telephone or post (see below).

## *Right to restrict use*

You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

## *Right of erasure*

You may ask us to delete some or all of your personal information and in certain cases, and subject to certain exceptions; we will do so as far as we are required to by law. In many cases, we will anonymise that information, rather than delete it.

## *Right for your personal information to be portable*

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, for example, when you shop from our website, you may ask us to provide it to you or another service provider in a machine-readable format.

## *Right to object*

You have the right to object to processing where we are using your personal information based on legitimate interests, (or for statistical/research purposes). In these circumstances we will consider your request against our legitimate reasons for continuing to process your information.

You have an absolute right to object to direct marketing. If you wish to opt-out of receiving marketing materials from us at any time, please contact the address below.

If you want to exercise any of the above rights, please contact us. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the UK’s [Information Commissioner’s Office](https://ico.org.uk/).

**Keeping your information safe**

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it, such as Firewalls, anti-virus protection and encryption. Home-Start UK has developed a set of security policies that include device security, authentication requirements, acceptable usage of resources, data storage requirements.We undertake regular reviews of who has access to information that we hold to ensure that your info is only accessible by appropriately trained staff, volunteers and contractors.

**Keeping your information up to date**

We take reasonable steps to ensure your information is accurate and up to date. Where possible we use publicly available sources to identify deceased records or whether you have changed address. We really appreciate it if you let us know when your contact details change.

**16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under‚ please get your parent/guardian's permission beforehand whenever you provide us with personal information.

**Vulnerable circumstances**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

**Changes to this notice**

Any changes we may make to this notice in the future will be posted on this website so please check this page occasionally to ensure that you are happy with any changes. If we make any significant changes we will make this clear on this website.

**Review of this Privacy notice**

We keep this notice under regular review. This notice was last updated in January 2019.

For further information on each of these rights, including the circumstances in which they apply, visit the Information Commissioner’s Office (“ICO”) website at <https://ico.org.uk/for-the-public>

If you would like to exercise any of the rights, please email, call or write to us using the details in ‘How to contact us’ below, let us have enough information to identify you, let us have proof of your identity and address, and let us know the information to which your request relates.

**How to complain**

Please report any complaint to the details set out in ‘How to contact us’ below. We hope we can resolve any query or concern you raise about our use of your information. You also have the right to lodge a complaint with the ICO who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

**How to contact us**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you at Home-Start Dunfermline, 41 Bruce Street, Dunfermline, KY 12 7AG;

e-mail: admin@hsdunfermline.co.uk or Telephone: 01383 621349

Our Data Protection Officer/Lead is Elaine Dryburgh, Operations Administrator.

**APPENDIX1**

**1. Human Resources (a) employees**

**How do we collect information from you?**

The information we hold about you is primarily information you provided when applying for your job, supplemented by information generated in the course of your employment.

**What type of information is collected from you?**

* Your name, address, contact details
* Unique personal identifiers, e.g. date of birth, photographs
* Your attendance at Home-Start (*add name*)
* Personal data provided by you for a specific purpose, e.g. disability
* Copies of passports, visas and any other documentation required to ensure compliance with Home Office requirements
* Details of your education and qualifications
* Your application and/or CV
* Job title, grade and salary
* Reporting and managerial responsibilities
* Details of your career
* References
* Your contract of employment
* Performance reviews
* Disciplinary, grievance and capability procedures
* Accidents at work
* Details about any medical conditions
* Details of any training received
* Time and attendance details
* Bank account details for salary and pension purposes
* Audio recording of your interview (if applicable)
* Video recording of your interview (if applicable)
* Interview tests/results

**Sensitive personal data held by HSUK**

We require to use some personal data that is considered under data protection law to be ‘special category data’ for example, in relation to your health or ethnicity. We also use some other data which you may consider to be sensitive such as financial information. The information we hold is that which you provide to us (e.g. you may give us information when you applied for your role, or in response to staff surveys)

Records may contain:

* Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
* Health issues requiring adaptations to your working environment
* Leaves of absence such as maternity leave, sickness absence, etc
* Health and safety incidents, accidents at work and associated records.

**How and why is your information used?**

We are required to use your personal data for various legal and practical purposes for the administration of your contract of employment, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative and legal obligations, (e.g. for tax purposes).

**How long is your information kept for?**

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be securely destroyed when no longer required.Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of employment K and date of birth) to ensure that we do not contact you or process your data again inadvertently in future, and to maintain your record for employment record purposes.

We reserve the right to judge what information we must continue to hold to be able to fulfil our contract with you.

**Who has access to your information?**

Personal data, including sensitive personal data, may be shared with members of staff, including trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that special category personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without obtaining your consent. This will only occur in compliance with data protection law if it is necessary to protect your vital interests or the vital interests of another person, or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations. We may disclose certain personal data to third parties. These third parties, and the purpose for sharing the information, are set out below:

* Relevant data may be shared with your next of kin but only with your consent or in an emergency
* Relevant data may be shared with the Home-Office, UK Visas and Immigration for the purpose of proving eligibility to work in the UK
* Data may be shared with reputable “data processors” for the purpose of sending communications, e.g., staff surveys
* With your permission we may share information about you for publicity and marketing purposes online, in print and on social media

Otherwise we do not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

**Lawful Processing**

The lawful basis for processing your personal data is necessary for the performance of your employment. There is a contractual requirement for you to provide much of the information detailed. Without this we are unable to fulfil our obligations which could result in termination of contract.

**1. Human Resources (b) job candidates**

**How do we collect information from you?**

As part of our candidate application and recruitment process we collect, process and store personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment checks and your worker permissions.

**What type of information is collected from you?**

The following are some examples of the type of information we may process (there is a full list in the schedule at the end of this notice)

* Personal details such as name, address, date and place of birth
* Work history/job data, previous employers, positions, dates
* Compensation; salary, benefits, bonuses
* Education and work history including professional qualifications and skills
* Employer feedback/references, to include regulated references where necessary
* Nationality, visa, right to work information (e.g., passport, National Insurance number)
* Results of pre-employment checks, such as DBS/PVG/Access NI checks where permitted under local law
* Assessment results, such as results from any interview exercise, or video or telephone assessment

During the process we also capture some personal data that is considered under data protection law to be ‘special category data’ about you, e.g., disability information. We do this in order to make reasonable adjustments to enable all candidates to apply for jobs with us, to be able to take online/telephone assessments or interviews, to attend interview/assessment centres and to ensure that we comply with regulatory obligations with regard to hiring.

**How and why is your information used?**

In order to manage your application, we need to process certain personal information about you. The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements, so not all of the purposes set out below will apply to you all of the time.

* Application: Application form or CV, name, address, employment history, academic and professional qualifications, age, diversity, (i.e. gender, ethnicity, disability, sexual orientation), nationality, previous disciplinary matters.
* Assessment: CV, interview (face to face, telephone or video), exercise or test.
* Pre-employment: Right to work in the UK, qualifications, references

**How long is your information kept for?**

For unsuccessful candidates personal information will be retained for 6 months following the recruitment process. For successful candidates all personal information collected as part of the recruitment process will be transferred to an employee personnel file and will be retained for six years following termination of employment

**Who has access to your information?**

The recruitment process will involve:

* Assessing and progressing your application
* Assessing your suitability (skills, strengths and behaviours) for the role
* Activities needed to complete on-boarding and screening processes should your application be successful

To enable these processes your personal information may be shared internally. The information shared is limited to what is required by each individual to perform their role in the recruitment process. Your personal information may be shared with the following:-

* The hiring manager
* The line manager
* The interview panel
* The HR manager
* The IT Manager (if application successful)
* Finance (if application successful)

Our HR and recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of personal information does not occur. This is done in line with the Data Protection & Confidentiality policies.

**Lawful Processing**

**Pre-employment checks**

As part of the recruitment and selection process we will carry out pre-employment checks. These checks are only performed on candidates who have been selected for a role. Your consent will be requested before pre-employment checks are carried out.

**Processing conditions**

Our entitlement to process your personal information is governed under data protection law by a number of processing conditions. This means we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process.

* We will process your personal information where it is required by law or regulation or it is in the legitimate interest of the applicant or our organisation.
* During the course of your application it may also be necessary for us to process your sensitive personal information as per the detail in Paragraph 2 above or Schedule 1 below.

**Schedule 1 - Full list of information that we may process**

* Name, work and home contact details
* Date and place of birth
* Education and work history
* \*Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, gender)
* \*Health issues requiring adaptations to working environment
* Job title, grade and job history
* Employment contract related information (including compensation, location, hours of work, etc)
* Reporting and managerial relationships
* \*Leaves of absence (such as maternity leave, sickness absence)
* Photographs
* Disciplinary/grievance records
* Time and attendance details
* Bank account details for salary payment purposes
* Expenses such as travel and expenses
* Skills and qualifications
* Training history and plans
* Results of original and ongoing employee screening (where relevant)
* \*Health and safety incidents, accidents at work and associated records
* Face to face interview notes
* Audio recordings of interviews
* Video recordings of interviews
* Interview test/exercise results

\*These categories of information might potentially include some special category personal information. Special category personal information is collected were we have a legal obligation to do so or if you choose to disclose this to us during the course of your relationship us.

**1. Human Resources (c) referees**

**How do we collect information from you?**

Your personal details have been provided to us by another person (applicant) who has indicated you as a referee. We must have a legal basis for processing your personal data. We will only use your personal data in accordance with the terms of our privacy notice.

**What type of information is collected from you?**

* Name
* Name and address of company, position and relationship to applicant (when providing an employment reference)
* Personal address and relationship to applicant (when providing a personal or character reference)
* Telephone number and/or email address

**How and why is your information used?**

We will collect your personal data and process your personal data for the purpose of obtaining references for our applicant.

**How long is your information kept for?**

We will retain your personal data along with the applicant’s data for as long as is necessary. Different laws require us to keep different data for different periods of time, which are detailed in Appendix below:

**Where the applicant is unsuccessful**

If the applicant is unsuccessful after you have provided a reference the data will be kept for 6 months. The electronic data will then be deleted and the paper data confidentially shredded.

**Where the applicant is successful**

If the applicant is successful the data will be transferred to their personnel file which will be kept for six years after the end of their employment. The electronic data will then be deleted and the paper data confidentially shredded.

**Who has access to your information?**

Where we need to share your personal data we require the recipients to treat your information as confidential and ensure the continued protection of your data whilst in their possession. We will process your personal data with the following recipients:-

a) The hiring manager

b) The line manager

c) The HR manager

d) Third party, where necessary, to protect the applicant’s vital interest, e.g., emergency services

**Lawful Processing**

The legal basis we rely upon when processing your personal data are:-

**Legitimate Interest**

To fulfil our recruitment requirements which obtaining references is a vital part of in order to ensure we are recruiting the best and most reliable people for our organisation