



INTRODUCTION

- This Staff Privacy Policy sets out the basis on which any of your personal data will be collected, stored and processed by Place2Be during the course of your engagement as Staff of Place2Be. It explains what we do with your personal data from the point at which you join Place2Be until after our relationship ends. Personal data here means any information that we collect about you that relates to you or that can be used to identify you.
- To be clear, when we refer to this policy applying to "Staff", this includes current and former employees and interns engaged directly in the business of Place2Be and as well as certain other workers who are or were engaged in the business of providing services to Place2Be (even though they are not classed as employees). For example, individuals who work from Place2Be's premises and have access to the Place2Be intranet page. This Staff Privacy Policy does not apply to independent contractors or consultants performing services for Place2Be, both of which will be considered a 'supplier' for the purposes of Place2Be's general [Privacy Policy](#).
- References to "**Place2Be**", "**we**" or "**us**" in this Staff Privacy Policy are to Place2Be, a company limited by guarantee (company number: 02876150) and a charity registered in England and Wales (registered charity number: 1040756) and Scotland (registered charity number: SC038649) with its registered office address at 175 St. John Street, London, EC1V 4LW. Place2Be is the controller of your personal data (this means we are responsible for your personal data).
- This Staff Privacy Policy is non-contractual, and we may amend it from time to time. Please visit this policy if you want to stay up to date, as we will post any changes in our approach to data privacy here. We will also inform you where we have made substantial changes.
- If you have any questions about this Staff Privacy Policy or how we handle your personal data, please contact our Data Protection Officer, at 175 St John St, London, EC1V 4LW or by emailing Privacy@Place2Be.org.uk.

PERSONAL DATA WE COLLECT

We collect data about you to enable us to ensure that our relationship runs smoothly and that we are each able to comply with our contractual and other duties to each other as part of our relationship and our duties to third parties such as tax authorities and government agencies. Depending on the relevant circumstances and applicable laws and requirements, we may collect some or all of the information listed below to help us with this, where appropriate:

- **Recruitment Information obtained during your recruitment process** (see the [Place2Be Recruitment Privacy Policy](#)), such as contact information, personal characteristics, identity information, education and training information, talent management information and diversity information.

- **Right to Work Information**, such as name, date of birth, nationality and citizenship, immigration status, passport details or copy, national ID details or copy and work permit documentation.
- **Job Role, Payroll and Salary Information**, such as job title, start date, photograph, employee ID, job location, date of birth, payroll records, pay slips, salary and other compensation details, tax and contribution details, bank account details and national ID number.
- **Pension and Benefits Information**, such as contact details, date of birth, national ID number, salary and other compensation details, pension contributions, benefits selection, selected beneficiary details and benefits arrangements (including any benefit-specific information that we are required, or consider useful, to process).
- **Disciplinary and Grievance Information**, such as details of any grievance or disciplinary matters, whether brought by or against you or in which you are otherwise involved (including parties involved), minutes of any disciplinary or grievance meetings conducted, and decisions taken on disciplinary and grievance matters.
- **Training Information**, such as details of training attended (mandatory or optional) and details of training completion.
- **Performance Management Information**, such as performance details, appraisal forms, appraisal comments and feedback, appraisal decisions, details of identified goals and objectives, details of salary review, details of any bonuses or promotions you receive during your engagement, and other information that relates to your employment, your interaction with colleagues and employment-related issues that arise.
- **Leave of Absence Information**, such as leave entitlement, details of leave request, details of acceptance or rejection of request, dates of leave, details of leave e.g. sickness leave, parental leave, annual leave, etc. (including health-related information if provided for leave purposes).
- **Accidents and Incidents at Work Information**, such as job role, work tasks, details of accident or incident (including individuals involved), location of accident or incident and details of any follow up actions.
- **Emergency Contact and Dependent Information**, such as name of emergency contact, contact details of emergency contact and the nature of your relationship with emergency contact.
- **Diversity Information**, such as sex, sexual orientation, racial or ethnic origin, religious or other similar beliefs, physical or mental health, sexual orientation and Trade Union Membership.
- **Health Information**, such as disability information and any information you voluntarily provide us when you complete a health questionnaire.
- **Survey and Employee Feedback Information**, such as responses to employee surveys and employee feedback requests.
- **Employee Offboarding Information**, such as resignation letter, exit details and exit interview notes.
- **IT Services Information**, such as Communications which pass through Place2Be's servers or on/from Place2Be's devices, including emails, instant messages, social media posts and text messages that you send and receive from your Place2Be email address, Place2Be-related social media accounts, communications via apps on Place2Be's devices, and any comments you post on client profiles.
- **Access Information**, such as CCTV footage and other information obtained through electronic means such as swipecard records.
- **Extra Information**, such as information that you choose to tell us (e.g. child or carer arrangements) and information we may receive from any other third party sources (e.g. information that your

colleagues choose to tell us about you, information that your referees choose to tell us about you, information that our service users choose to tell us about you).

A number of the items listed above are required to enable us to fulfil our contractual duties to you or to others. For example, your national insurance number is required by law. Other items may simply be needed to ensure that our relationship can run smoothly. Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

HOW WE COLLECT YOUR PERSONAL DATA

We collect your personal data in three primary ways:

1. Personal data that you give to us;
2. Personal data that we receive from other sources; and
3. Personal data we collect automatically.

Personal data you give to us

Place2Be needs to know certain information about you in order to fulfil our obligations to you, to ensure that you are properly fulfilling your obligations to us, and to ensure that we are both fulfilling our obligations to others. We generally collect your personal data directly from you; however in limited circumstances explored in the sections below we may obtain personal data about you from third parties.

There are numerous ways that you can share your information with us. These include:

- When you complete employee registration forms upon joining Place2Be;
- By updating your details on Cascade (HRIS);
- In meetings with your line manager, our HR team or other colleagues; and
- Data you put on our systems, for example via documents you create.

Personal data we receive from other sources

We also receive personal data about you from other sources. These may include:

- Information obtained about you when we searched third party sources such as LinkedIn and other job sites for potential candidates for your role;
- If you were referred to us through a recruitment agency, they may have shared personal data about you with us;
- Information obtained about you from third party service providers who undertook background checks about you on our behalf at the start of our relationship;
- Your referees may have disclosed personal data about you to us;
- Our service users or donors may share personal data about you with us;
- Your colleagues may share personal data about you with us;
- Medical professionals may (where appropriate and in limited circumstances) share personal data about you with us;
- Your pension and benefits providers may share relevant personal data about you with us;
- Other third parties like HMRC may share your personal data with us; and

- If you 'like' our page on Facebook or 'follow' us on Twitter (or similar), we will receive your personal data from those sites.

Personal data we collect automatically

- Communications which pass through Place2Be's systems or on/from Place2Be's devices, including emails, instant messages, social media posts, text messages and app-based messages (such as WhatsApp) that you send and receive from your corporate email address, corporate-related social media accounts (including LinkedIn) or on Place2Be's devices, including BYO Devices where communications are sent via our Place2Be systems.

HOW WE USE YOUR PERSONAL DATA

Having obtained data about you, we then put it to good use.

Where appropriate and in accordance with any laws and requirements, we generally use employee data in five ways:

- **To ensure the smooth running of our relationship with you (including all of the activities that need to be undertaken in a usual relationship of that type);**
- **To undertake equal opportunities monitoring.**
- **To help us to establish, exercise or defend legal claims; and**
- **To help us to help you if you suffer from a health condition or disability.**

Here are some more details about each:

To ensure the smooth running of our relationship with you (including all of the activities that need to be undertaken in a usual relationship of that type)

We have listed below various ways in which we may process or use your personal data for this purpose, where appropriate and in accordance with any relevant laws:

- Collecting your data from you and other sources, such as your referees;
- Determining the terms on which you work for us;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- Making decisions about your continued engagement with us;
- Verifying information we have received, using third party resources (such as psychometric evaluations or skills tests), or through information requests (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with the law);
- Storing your details and maintaining your personnel file (including updating them when necessary) on our databases;
- Facilitating our payroll and invoicing processes;
- Administering your pension and benefits (including where applicable, liaising with your Place2Be pension and benefits providers and ensuring that your benefits can be administered appropriately);
- Complying with our legal obligations (including in connection with the detection of crime, the collection of taxes or duties and implementation of health and safety regulation);
- Managing and keeping a record of your working days, holidays, sick leave and any other absences, including family leave;
- Carrying out performance reviews (including keeping records of our conversations and meetings and seeking feedback from your colleagues and managers) and performance management;

- Keeping a record of any promotions, salary rises or bonuses you are awarded;
- Where necessary, when carrying out investigations, disciplinary or grievance proceedings (please refer to the intranet under Resources > Policies and Procedures > HR for more information about our disciplinary and grievance policies);
- Ensuring health and safety in the workplace;
- Managing employee surveys and feedback;
- Conducting data analytics studies to review and better understand employee retention and attrition rates;
- Providing you with training (including sending your details to third party providers so that you can participate in specialist training) to help to improve your performance and keeping a record of your training;
- Ensuring compliance with our rules and processes
- Intercepting and monitoring communications which pass through Place2Be's systems or on/from Place2Be's devices, including emails, instant messages, social media posts, text messages and app-based messages (such as WhatsApp) that you send and receive from your corporate email address, corporate-related social media accounts (including LinkedIn), or on Place2Be's Devices, including BYO Devices where communications are sent via our systems (in accordance with our policies, which we review and update as necessary), and any comments you post on candidate or client profiles;
- Keeping a record of security pass data so that we can be sure who is on our premises at any given time;
- Running CCTV at our premises to ensure the safety and security of our Staff and property;
- Carrying out any other obligations or necessary requirements arising from the relationship between us; and
- Offboarding you at the end of your engagement with us (including carrying out exit interviews and making any other arrangements for the termination of our relationship);

To undertake equal opportunities monitoring

- We are committed to ensuring that our employment processes are aligned with our Equal Opportunities Policy.
- Some of the data we may collect about you (in appropriate circumstances and in accordance with relevant legal requirements) comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other beliefs, and/or social-economic background. Where appropriate, we will use this information on an anonymised basis to monitor our compliance with our Equal Opportunities Policy.

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

To help us to help you if you suffer from a health condition or disability

- If you suffer from any health conditions or disabilities during our relationship, where you allow us to do so, we may record details of them so that we can make reasonable adjustments to your workplace and working arrangements if required, including phased return arrangements. Where appropriate and where you allow us to do so, we may also liaise with medical professionals about your condition to ensure that you are getting the support you need and to assess your working capacity more generally.

On rare occasions, we may also use your personal data where we need to protect your interests (or someone else's interests) or where it is needed in the public interest (or for official purposes).

LAWFUL BASES FOR US PROCESSING YOUR PERSONAL DATA

Under data protection law we can only use your personal data where we have a lawful bases (justification) and we rely on the following lawful basis to process your personal data:

- **Performance of Contract.** In most cases we process your personal data because it is necessary for the purposes of performing the contract under which you are directly engaged as Staff of Place2Be.
- **Legal Obligation.** In dealing with your personal data we are also subject to laws which apply to Place2Be generally. As a result, we process some of the personal data we collect about you for the purposes of complying with our legal obligations. For example, employment law, health and safety law, tax laws and even data protection laws may require us to process personal data in a specific manner.
- **Consent.** In rare circumstances, and where appropriate, we may seek your consent to process specific personal data. If we do that, we will request your consent in writing, and explain the purpose of the processing. You have the right to withdraw your consent using information provided in the consent document.
- **Legitimate Interest.** If we do not rely on the grounds explained above (performance of contract, legal obligation or consent) for processing your personal data, we will only process your personal data because it is necessary to further our legitimate business and commercial interests, provided these interests do not infringe on your fundamental rights. Our relevant legitimate business and commercial interests include:
 - recruitment and succession planning;
 - organisation and distribution of work;
 - career development and training;
 - internal administrative purposes;
 - management forecasting;
 - promoting equality and diversity in the workplace;
 - protection of Place2Be property and property belonging to third parties;
 - conducting investigations into alleged misconduct or inappropriate behaviour;
 - preventing unauthorised use of Place2Be information and equipment;
 - maintaining an efficient benefits program;
 - maintaining a well-managed and orderly workforce and business;
 - establishing, exercising or defending legal claims;
 - in connection with merger or acquisition arrangements.

HOW WE SHARE YOUR PERSONAL DATA

- Where appropriate, we may share certain of your personal data, in various ways and for various reasons, with the following categories of people:
 - Appropriate colleagues within Place2Be;
 - Your family and personal representatives;
 - Individuals and organisations who hold information related to your reference or application to work with us, such as current or past employers, educators and examining bodies, immigration agencies and employment and recruitment agencies;
 - Prospective employers (for example, when providing a reference);
 - Third parties who hold information related to your financial record such as financial organisations, credit reference agencies and debt collection and tracing agencies;
 - Medical professionals such as your GP or an occupational health specialist;
 - Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of our obligations to tax authorities or in connection with any anticipated litigation);
 - Third party service providers who perform functions on our behalf (including benefits administration (such as share plan administrators, insurers, private medical and dental providers and pension scheme administrators), external consultants, business associates and professional advisers such as lawyers, auditors, accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
 - Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
 - Third parties involved in, or assisting with, litigation (including legal advisers, witnesses, experts and judicial and quasi-judicial authorities);
 - If Place2Be merges with or is acquired by another charity in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the relevant parties and their advisors for this purpose; and
 - Third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with any relevant laws.
 - Third parties, where we are obliged by law to disclose personal data, including to law enforcement agencies and applicable regulators, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We are located in the United Kingdom and store your personal data in the United Kingdom.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- Subject to your rights (as explained in this Staff Privacy Policy) we will ordinarily process your data throughout the course of your employment and will then retain it for a period after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and

other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain certain data for the purposes of tax reporting or responding to tax queries. We may also retain it if it might be relevant to any potential litigation.

- In determining the appropriate retention period for different types of personal data, we always consider the following factors (i) amount, nature, and sensitivity of the personal data in question, (ii) the potential risk of harm from unauthorised use or disclosure of that personal data; (iii) the purposes for which we need to process it and whether we can achieve those purposes by other means; (iv) any permissions you give us with regards to your personal data; (v) our contractual obligations and rights in relation to the personal data involved; (vi) our legal obligation(s) under relevant laws to retain data for a certain period of time; (vii) our legitimate interests; (viii) whether retention is advisable in light of our legal position (such as with regard to applicable statute of limitations, investigations, litigation, and other potential and actual disputes); and (ix) any guidelines issued by relevant data protection authorities.
- Once we have determined that we no longer need to hold your personal data, we will anonymise or delete it from our systems.

YOUR RIGHTS

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your personal data and can exercise any of these rights by contacting your relevant HR contact or by emailing us at Privacy@Place2be.org.uk. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You may have the following rights in relation to your personal data:

- **Request access to your personal data (commonly known as a “data subject access request”).** This enables you to access and receive a copy of the personal data we hold about you, along with supplemental transparency information similar to what is provided in this Staff Privacy Policy, and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have us correct your personal data if it is incomplete or inaccurate.
- **Request erasure of your personal data.** This enables you to have us delete or remove personal data where there is no good reason for us continuing to process it or where you have successfully exercised your right to object to our processing of your personal data.
- **Request the restriction of processing of your personal data.** This enables you to have us suspend any further use of your personal data, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request to object to the processing of your personal data.** You have the right to object to us processing your personal data where we rely on “legitimate interest” (see the “lawful basis for us processing your personal data” section above) as a lawful basis for processing your personal data, and you want us to stop using and storing the particular personal data about you. We will consider your objection request seriously and if we do not agree with your objection or this right does not apply to you, we will explain why.
- **Request portability of your personal data.** This enables you to request we provide you or another party with any personal data we have obtained from you, in a structured, machine readable and reusable format.
- **Withdraw consent to the processing of your personal data.** You have the right to withdraw your consent at any time where we rely on your consent as a lawful basis for processing your personal data.

- **Not be subject to decisions based solely on automated processing (including profiling) which have a legal effect on you or a similarly significant effect on you.** This is relevant where we decide to use automated systems to process your personal data with no real human involvement. We do not currently engage in this type of processing activity.
- **Lodge a complaint with a data protection regulator.** You have the right to lodge a complaint about the way we handle or process your personal data with a national data protection regulator or supervisory authority. In the UK, this is the Information Commissioner's Office (ICO). For further details on how you can contact them, please see their website: [Information Commissioner's Office \(ICO\)](#).

Last Updated: April 2023