**Northern Ireland Hospice**

**Privacy Notice**

**(Employment)**

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| **Introduction** |

Northern Ireland Hospice (NIH) is committed to protecting the privacy of everyone who uses our care services (as patients or carers), our employees and volunteers, our education customers, our retail and café customers, our Members and Trustees, our service providers and anyone who supports our work through our fundraising activities. This policy explains what personal data we collect and process, how we collect it, how long we keep it, why we collect and process personal data, whom we share it with, and on what legal basis. It also explains the steps we take to keep data secure and ensures that you remain informed with regard to your rights and in control of your information. We will only use personal data that we collect in line with all applicable laws, including the General Data Protection Regulation (GDPR)

Sections:

1. Care Services (Patients, Carers and Family)
2. Donors and Supporters
3. **Employment (recruitment candidates and employees) and Volunteers**
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| **3.0 Employment, Volunteering and Training Records** |

NIH collects, stores and processes personal information about prospective, current and former staff, including applicants, employees (and former employees) and including agency, casual and contracted staff, volunteers, trainees and those carrying out work experience.

For candidates for employment, we process data on to fulfil our legal obligations, to take steps preparatory to a contract and for legitimate interests as recruiting/prospective employers.

For employees, we process data on to fulfil our responsibilities under contracts.

For volunteers we process personal data to fulfil legal obligations (for recruitment and safeguarding) and for legitimate interests in the case of expenses and training records.

The legitimate interests of Northern Ireland Hospice are to provide palliative care to patients, and support and information to their carers and families (for example social work, bereavement support, chaplain support) and to manage the effective running of Northern Ireland Hospice.

Special category data is obtained and processed for employees and candidates for employment for carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law.

**3.1 What types of personal data do we handle?**

The personal data we process in relation to employment, volunteering and training is provided to us by individuals beginning with the point of application for a role at NIH, or by the agency where we engage agency staff and continuing during our continuing relationship with them as candidates for employment, employees or volunteers.

In order to carry out our activities and obligations in respect of candidates for employments, employees and/or volunteers we may handle data in relation to:

* Personal demographics (including gender, age, race, ethnicity, sexual orientation, religion) (employees and

candiates)

* Contact details such as names, addresses, telephone numbers and emergency contact(s) (employees,

candidates and volunteers)

* Employment records (including professional membership, references and proof of eligibility to work in the UK

and security checks) (employees and candidates)

* Bank details (employees, candidates and volunteers)
* Pension details (employees only)
* Medical information including physical health or mental condition (occupational health information)

 (employees only)

* Information relating to health and safety (employees and volunteers only)
* Trade union membership (employees only)
* Offences (including alleged offences), criminal proceedings, outcomes and sentences (employees,

prospective employees who have received an offer of employment and volunteers)

* Employment tribunal applications, complaints, accidents, and incident details (employees, candidates and

volunteers)

* CCTV images and other photographic images used for promotion/fundraising

**3.2 What is the purpose of processing this data?**

Our legal bases for processing this information are: to fulfil our contract obligations; to comply with our legal obligations; and legitimate interests.

We process your data for the following reasons:

* Staff administration and management (including payroll and performance)
* Pensions administration
* Business management and planning
* Accounting, Record keeping and Auditing
* Crime prevention (including prevention of fraud) and prosecution of offenders
* Provision of education and training
* Health administration and services
* Monitoring health and safety arrangements
* To comply with legal obligations
* Contacting next of kin in the event of an emergency

Where the provision of personal data is a statutory or contractual requirement or a requirement relating to entering into a contract, if you fail to provide that data it might affect your application for employment/engagement or continued employment/engagement.

**3.3 Sharing of your data**

To enable effective staff administration we share your information with some specific external organisations in order to comply with our obligations as an employer, for example service providers such as payroll service providers, accountants, HR consultants, occupational health, Pension providers i.e. NILGOSC, DHSSPS and the People’s Pension. In those cases the personal data which we share will be limited to that required for providing the particular service and will be adequately protected.

Other circumstances when we might need to share your data can be found in Section 8.4 at the end of this Privacy Notice

Further details can also be provided by our People and Development Department.

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| **8.0 General Information** |

**8.1 How do you update your Personal Data?**

We want to make sure that your personal data is accurate and up to date. Please let us know if your details change. We may use publicly available sources to keep your records up to date for example, checking your postcode is correct using the Royal Mail postcode lookup facility.

To let us know of any changes please contact:

People and Development Department

Northern Ireland Hospice

18 O’Neill Road

Newtownabbey

BT36 6WB

Tel: 028 90781 836

**8.2 What Rights do I have over My Personal Data?**

Under the General Data Protection Regulation, you have the right to:

* be informed – this privacy notice provides the information we are required to provide
* access your personal data
* have your data rectified or erased
* object to or restrict the processing of your data
* withdraw consent if that is the basis of our processing – please contact our People and Development Department using the contact details above with any requests or our Data Protection Officer using the contact details below with any queries on this issue
* data portability – in limited circumstances you may be entitled to have any personal data we hold and which

you provided to us sent electronically to you or direct to another organization at your request

* not to be subjected to automated decision making (including profiling) which produces legal effects or similar

significant effects – NI Hospice does not currently do this

* to lodge a complaint with NIH or the overarching regulator, the Information Commissioners Office:

Information Commissioners Office – Northern Ireland

3rd Floor, 14 Cromac Place,

Belfast,

BT7 2JB,

Telephone: 028 90 278 757

E-mail: ni@ico.org.uk

Further information on these rights is available from the Information Commissioners website <https://ico.org.uk/>.

You have a right to receive a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

You have a right to ask us to stop processing or to delete your personal data. Where there is no need to for legal or regulatory requirements to retain the data, we will be able to do this.

**8.3 How we protect and keep your data?**

We have security procedures, rules and technical measures to protect your data. Your data will be kept in a secure environment with access restricted on a need to know basis.

Personal data will not be transferred to any third party in a country or territory outside the European Economic Area unless there is a specific operational reason to do so and in which circumstance we will require the third party to comply with and safeguard the data pursuant to requirements of GDPR. We will only transfer your personal data to a Country or Territory outside the European Economic Area whose data protection laws have been assessed as adequate by the European Commission, or where appropriate safeguards are in place. See third party processing section for further information.

When using websites owned by other organisations to communicate with us, such as Twitter or Facebook, then please consult their privacy policies/notices.

**8.4 Sharing of your Data by Northern Ireland Hospice**

We will not routinely disclose any information about you without your express permission. However, in addition to some specific reasons for sharing of data outlined within the various sections, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

Any disclosures of personal data are always made on a case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

The additional circumstances when we might have to share your data with other third parties are:

* You ask us to do so;
* If we are under a duty to do so under a legal obligation;
* Our duty to comply with any Court Orders which may be imposed
* To enforce our terms and conditions or other agreements;
* To protect our rights, property, our safety or the safety of our patients, customers or others;
* If the public interest is thought to be of greater importance, for example, if a serious crime has been

committed.

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes.

We may also collect and retain your information if you send feedback about our services or make a complaint

**8.5 How we keep data safe and who has access**

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected with controls regularly monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by properly trained staff, volunteers and contractors. We undertake regular data cleansing to ensure that the data is accurate and consistent with NIH Record Keeping Policy.

**8.6 Third Party Processing**

Sometimes we use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as UK or EU companies, we will take steps to make sure they provide an adequate level of protection in accordance with GDPR. Your personal data will not be transferred to countries outside the EEA unless the country ‘s data protection laws have been assessed as adequate by the EEA or where adequate safeguards as are approved by the EEA and/or ICO are in place. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

**8.7 Sharing Your Story**

You may choose to tell us about your experiences with life threatening, life-limiting illness as a service user, carer, volunteer, staff member, donor or an Ambassador to help further our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report.

**8.8 Retention Period**

We do not keep your data for longer than is necessary for the purposes for which it was provided. We will retain information on individuals in compliance with statutory requirements or in line with organisational needs where there are no such statutory requirements. Retention times for employees, candidates and applicants are outlined below. This is in accordance with our Records keeping policy and adheres to the requirements of the GDPR. Further details as to retention periods are also available in this policy.

Current retention timeframes are set out below:

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| **Category** | **Retention Timeframe** |
| Staff files | 6 years after termination of employment. \* exception in next line below |
| Staff names, commencement and termination dates and reason for termination | 50 years after termination of employment |
| Recruitment documentation | 6 years after post has been filled |
| Access NI documentation | Recruitment period only. Destroyed on commencement |
| Pensions documentation | Indefinitely |
| Payroll documentation | 20 years |
| Certificate of Employers Liability | 40 years |
| Volunteer files | 6 years after volunteer has left |

**8.9 Changes to this Privacy Notice**

We might change this Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the NIH website or by contacting you directly. The date when this privacy notice was last updated will be stated at the end of the Policy

If you have any questions about this privacy notice or about our data processing in general, require more information, of if you want to see what information we hold about you, please contact our Data Protection Officer

using the following contact details:

Beverley Kernoghan

Data Protection Officer

Northern Ireland Hospice

18 O’Neill Road

Newtownabbey

Co Antrim

BT36 6WB

Tel: 028 90781 836

Email: beverley.kernoghan@nihospice.org Updated: June 2018