

How we use your information

This privacy notice tells you what to expect when the Place for Hope collects personal information. It applies to information we collect about:

Visitors to our website

People who sign up to our Peacemakers Network mailing list / e-newsletter

People who contact us via social media

People who use Place for Hope support

People who use Place for Hope training

People who volunteer as Place for Hope Practitioners

People who Place for Hope contracts to supply specific services

People who apply for jobs with Place for Hope

Place for Hope employees

The document also contains information about:

Complaints or queries
Access to personal information
Links to other websites
Changes to policy notice
How to contact us

Visitors to our website

When someone visits www.placeforhope.org.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies

You can read more about how we use cookies on our cookies page [in development].



People who sign up to our Peacemakers Network mailing list / e-newsletter

E-newsletter

We use a third-party provider, Mailchimp, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see Mailchimp's privacy policy.

Information we process

Place for Hope processes your personal information if you sign up to join the mailing list for the purpose of keeping you informed about our news, work and events. Place for Hope holds contact details, job role and in some cases faith affiliation provided by you on the online sign up form or by signing up at events. This helps us to tailor our e-newsletter and deliver our <u>purposes</u> as a registered charity. This personal information will be retained by Place for Hope until you chose to opt out of receiving the e-newsletter, after which both manual and electronic copies will be destroyed, unless we seek and receive consent to retain them for another purpose.

People who contact us via social media

We use a third-party provider, Hootsuite, to manage our social media interactions.

If you send us a private or direct message via social media the message will be stored by Hootsuite for three months. It will not be shared with any other organisations.

People who use Place for Hope support

Place for Hope offers various <u>support services</u> to the public. You can contact us about this via phone, email and in person. We have to hold your personal information if you contact us about support services in order to provide them. This information includes contact details, job role and in some cases faith affiliation provided by you during the initial enquiry. We may also hold contact details and job role of relevant parties involved in the support case. However, we only use these details to provide the service you have requested, to deliver our <u>purposes as a registered charity</u>, and for other closely related purposes. Place for Hope will review every 5 years whether it is still important for delivering our purposes to continue to hold your information. You can ask us to erase it at any time. Both manual and electronic copies will be destroyed at the time of erasure.

Confidentiality would not apply where we are legally required to disclose or report specific matters should they arise in the course of our work (e.g. safeguarding). We provide anonymous



statistical information to our funders and, with your permission, use quotes from feedback in our marketing and promotional material.

People who use Place for Hope training

Place for Hope offers <u>training</u> to the public. We have to hold your personal information if you have requested training in order to provide it. This may include faith affiliation. However, we only use these details to provide the training you have requested, to deliver our <u>purposes as a registered charity</u>, and for other closely related purposes. For example, we may contact people who have received training to let them know about a similar training course. We may also provide anonymous statistical information to our funders about participation in our training.

Place for Hope will review every 5 years whether it is still important for delivering our purposes to continue to hold your information. You can ask us to erase it at any time. Both manual and electronic copies will be destroyed at the time of erasure.

We use a third-party provider, Stripe, to manage the payments for some of our courses. You can read <u>Stripe's privacy policy</u>.

People who volunteer as Place for Hope Practitioners

Place for Hope is the data controller and the person with responsibility for data protection compliance is the Director.

The organisation collects and processes personal data relating to its volunteers to manage the relationship. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the organisation collect?

The organisation collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number
- details of your relevant training and current employment; and start and end dates with the organisation;
- details of your bank account;
- details of when you undertake work for the organisation;
- support and supervision;



- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- information about your religion if you provide this voluntarily.

The organisation collects this information in a variety of ways. For example, data is collected through application forms; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation collects personal data about you from third parties, for example Supervisors.

Data is stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

Why does the organisation process personal data?

The organisation has a legitimate interest in processing personal data before, during and after the end of the relationship. Processing Volunteer Practitioner data allows the organisation to:

- maintain accurate and up-to-date records and contact details (including details of who
 to contact in the event of an emergency);
- allocate cases to ensure you are deployed appropriately;
- operate and keep a record of support and supervision;
- ensure effective general HR and business administration;
- provide references on request for current or former volunteers;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Who has access to data?

Your information will be shared internally, including your manager, and other staff if access to the data is necessary for performance of their roles.

The organisation shares your data with third parties in order to get pre-selection references.



The organisation also shares your data with third parties that process data on its behalf, predominantly in connection with expenses payments.

For how long does the organisation keep data?

The organisation will hold your personal data for the duration of your volunteer contract. The periods for which your data is held after the end of your contract are set out in the data protection policy.

What if you do not provide personal data?

You have some obligations under your contract to provide the organisation with data.

Certain information, such as contact details, have to be provided to enable the organisation to enter a contract with you.

Policy review

This policy will be reviewed every 2 years.

People who Place for Hope contracts to supply specific services

Place for Hope processes personal information, including contact and other details, provided by those who it contracts to provide various kinds of consultancy support to deliver our <u>purposes</u> as a registered charity, and for other closely related purposes. This personal information will be retained by Place for Hope until the end of the consultancy arrangement, after which both manual and electronic copies will be destroyed, unless we seek and receive consent from you to retain them for another purpose.

People who apply for jobs with Place for Hope

Place for Hope is the data controller and the person with responsibility for data protection compliance is the Director.

As part of any recruitment process, the organisation collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.



What information does the organisation collect?

The organisation collects a range of information about you. This may include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- information about your religion, either provided voluntarily as part of an application or because required in accordance with the Equality Act 2010 Sch. 9, Para 3.

The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The organisation will also collect personal data about you from third parties in order to obtain pre-employment references. The organisation may also obtain obtain necessary criminal records checks from the Disclosure and Barring Service or Disclosure Scotland

The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so in accordance with our Recruitment and Selection policy.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does the organisation process personal data?

The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The organisation has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the

organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

The organisation may also need to process data from job applicants to respond to, and defend against, legal claims.

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Where the organisation relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The organisation processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

The organisation processes information about your religion for any role for which it is an occupational requirement to be a member of a faith community in accordance with the Equality Act 2010 Sch. 9, Para 3.

For some roles, the organisation may be obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The organisation will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes the Director, interviewers involved in the recruitment process, and administrative staff if access to the data is necessary for the performance of their roles.

The organisation will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with third parties in order to obtain pre-employment references. The organisation may also obtain obtain necessary criminal records checks from the Disclosure and Barring Service or Disclosure Scotland.

The organisation will not transfer your data outside the European Economic Area.

How does the organisation protect data?

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does the organisation keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for six months after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please email info@placeforhope.org.uk. To make a subject access request, you should also email info@placeforhope.org.uk.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

Except in the case of jobs which require the post holder to be a member of a faith community in accordance with the Equality Act 2010 Sch. 9, Para 3, there is no expectation that applicants should provide information about their religion or belief on application forms and there are no consequences of not doing so.

Automated decision-making

Recruitment processes are not based on automated decision-making.



Policy Review

This policy will be reviewed in two years' time.

Place for Hope employees

Place for Hope is the data controller and the person with responsibility for data protection compliance is the Director.

Place for Hope collects and processes personal data relating to our employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does Place for Hope collect?

We collect and processes a range of information about you. This may include:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record;
- 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;
- 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, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- information about your faith affiliation.

We collect this information in a variety of ways. For example, data is collected through application forms; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments.

In some cases we collect personal data about you from third parties, such as references supplied by former employers or information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in our HR management systems and in other IT systems (including our email system).

Why does Place for Hope process personal data?

We need to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit and pension entitlements.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are 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. For certain positions, it may be necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows Place for Hope to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce 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 it complies with duties in relation to
 individuals with disabilities, meet its obligations under health and safety law, and 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 the organisation complies 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 for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where Place for Hope relies on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of employees or workers and have concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes and processing may also be necessary for the purposes of preventive or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis. This will be the case when managing ill health or carrying out Occupational Health assessments).

We need to process information about faith affiliation for jobs which require the post holder to be a member of a faith community in accordance with the Equality Act. In other instances, employees are entirely free to decide whether to provide such data, on application forms or subsequently, and there are no consequences of failing to do so.

Who has access to data?

Your information will be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

Place for Hope may share your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service.

We also share your data with third parties that process data on our behalf, predominantly in connection with payroll and the provision of benefits.



For how long does Place for Hope keep data?

We will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are:

- a. Payroll, salary, benefit data 7 years
- b. Maternity, paternity pay records 3 years
- c. Criminal record checks deleted promptly
- d. Personal files retained 10 years after the staff member has left
- e. Finance Records retained 7 years
- f. Personnel Records full personnel file held for full duration of employment. Certain records held for a number of years after the staff member has left. For example:
 - Health and safety records up to 10 years or more depending on the type of record.
 - Any records which may be required to prepare for, or defend, a legal claim.

After the above periods, both manual and electronic records shall be destroyed securely.

What if you do not provide personal data?

You have some obligations under your employment contract to provide Place for Hope 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 Place for Hope with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable Place for Hope to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Policy review

This policy will be reviewed every two years.

Complaints or queries

Place for Hope tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of



information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you want to make a complaint about the way we have processed your personal information, you can contact us by emailing: info@placeforhope.org.uk.

Access to personal information

Place for Hope tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'Subject Access Request' under the GDPR. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

A Subject Access Request can be made by emailing <u>info@placeforhope.org.uk</u>. We will normally respond to such a request within one month.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 8 November 2018.

How to contact us

If you want to request information about our privacy policy you can email us at: info@placeforhope.org.uk or write to:

Place for Hope Clydeway House 813 South Street Glasgow G14 0BX