



**Together
we will end
homelessness**

Staff Privacy Notice

How your information will be used

1. As your employer, Crisis needs to keep and process information about you for the standard employment purposes that you would anticipate any employer would. The information we hold and process will be used for our management and administrative use only.
2. This notice applies to current and former employees. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.
3. We will keep and use it to enable us to run our charitable business and manage our relationship with you effectively, lawfully and appropriately, during:
 - a. the recruitment process,
 - b. whilst you are working for us,
 - c. at the time when your employment ends and
 - d. after you have left.
4. This includes using information to enable us to comply with our employment contract with you, to comply with any legal requirements, pursue the legitimate interests of Crisis and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
5. We do not use automated decision making tools or systems when managing any aspect of employee or candidate information at Crisis.

The lawful basis that enables us to process your information

6. We also process your information to support our contractual relationship with you - the most obvious example is the processing of your bank details in order to pay salaries and reimburse expenses;
7. Where the processing is necessary in order to comply with a legal obligation: for example, maintaining records of sick leave and other types of leave for which statutory payments are available, as well as complying with health and safety law in certain circumstances;
8. Where the processing is necessary for our 'legitimate interests': This ground enables us to process your personal data where we have a legitimate interest (more than simply an economic interest) which is not outweighed by your right to privacy and such processing is necessary in pursuing that interest. For example, to prevent fraud, administrative purposes, salary benchmarking or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.

Where do we get your information from?

9. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees or the Disclosure Barring Service. The sort of information we hold includes:
 - a. your application form and references, including any criminal record that you may disclose to us, or becomes disclosed to us where Disclosure and Barring Service (DBS) checks are conducted for roles requiring additional vetting processes
 - b. your contract of employment and any amendments to it;
 - c. correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary;
 - d. information needed for payroll, benefits and expenses purposes;
 - e. contact and emergency contact details;
 - f. records of holiday, sickness and other absence;
 - g. information needed for equal opportunities monitoring policy including protected characteristic information, any experience of having been homeless; and
 - h. records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.
 - i. Information disclosed to us in confidence (e.g. details of any abuse that you may have suffered, either current or historic). We store this in order to provide you with support and to safeguard individuals.
10. You will, of course, inevitably be referred to in many organisational documents, records and emails that are produced by you and your colleagues during your duties whilst working for Crisis.
11. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. This may also involve making a management referral to our occupational health support service delivered by an external organisation. We will also need this data to administer and manage statutory and organisational sick pay.
12. Where we process special categories of information (as defined by the Data Protection Act 2018 incorporating the General Data Protection Legislation (GDPR)) relating to your health (including any declared disability), racial or ethnic origin, disclosed criminal convictions or sentences, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to process those details unless this is required by law or the information is required to protect your health in an emergency.
13. CCTV images are captured in Crisis premises for the purposes of safety and security. We may also use these images to investigate alleged criminal activities, or to support internal disciplinary investigations that are about you.

14. Where you may have disclosed to us that you have experience of homelessness as part of an application process, we may use it in our decision making process about who to shortlist, and will use it to identify any additional support that may be needed during the early stages of employment with us.
15. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
16. In addition, we monitor computer use, as detailed in our Electronic Communications Policy, available on Connect.

Sharing and keeping your personal information

17. Other than as mentioned below, we will only share (disclose) information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you. We always ensure that the organisations that we work with meet robust information security standards as part of our contractual due diligence process. The following third-party service providers may process personal information about you for the purposes listed:

Name	Purpose
RSM Employer Services Ltd ¹	Payroll bureau
Aegon	Pension Services provision
Occupational Medicals	Provision of occupational health services to Crisis and staff members
MPM legal	Provision of legal services to Crisis in relation to HR matters
EBP (Employee Benefits Partnership)	Pensions and life insurance advice and administration
Zurich	Group Life Assurance and Death in Service Benefit
XpertHR ²	Benchmarking pay against the upper quartile of the relevant market ³
Agenda	To enable staff to take part in the staff survey
Verifile	To process criminal record checks when required
GB Group	To process criminal record checks when required

¹ RSM may process data outside of the UK but within the EEA

² XpertHR may process data outside of the UK but within the EEA

³ The benchmark reference point is upper quartile looking at organisations with similar staff numbers, annual turnover and location

18. Most of your personal data will be stored for a period of six years, although there are some occasions (for example pension arrangement details) which will be retained for longer. Full details of how long we keep information for are in our retention schedule on Connect.
19. We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Your Rights

20. Under the UK General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to:
 - a. request from us access to and rectification or erasure of your personal data,
 - b. the right to restrict processing,
 - c. object to processing as well as in certain circumstances the right to data portability.
21. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
22. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the UK GDPR or DPA 2018 about your personal data. They can be contacted via their website <https://ico.org.uk/concerns/handling/>, but we would prefer that you discuss concerns with either your line manager, our HR team or our own data protection officer before escalation to the regulatory body.

Identity and contact details of controller and data protection officer

23. Crisis is a data controller of data for the purposes of the DPA 2018 and UK GDPR.
24. If you have any concerns as to how your data is processed, you can contact our Data Protection Officer Beverley Adams-Reynolds data.protection@crisis.org.uk or you can call her on 0207 036 2663. Beverley is based at our London Head Office.

Relevant Policies

25. See also our Data Protection Policy which is available on Connect.