**Privacy Policy**

**This privacy notice explains how the Blackburn Diocese Board of Finance (BDBF) and Blackburn Diocese Board of Education (BDBE) protect and manage any personal data that you share with us and that we hold about you, including how we collect, process, protect and share that data, to manage the employment relationship.**

The BDBF and BDBE is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

**What information does the BDBF & BDBE collect?**

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

* 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 BDBF and BDBE;
* 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 marital status, next of kin, dependants and emergency contacts;
* 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 including key fob activity, time sheets) 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 BDBF and BDBE needs to make reasonable adjustments;
* equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
* details of trade union membership (optional)
* The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs.

The BDBF and BDBE collects this information in a variety of ways. For example, data is collected through application forms or CVs; 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 (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the BDBF and BDBE collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your HR file, in the BDBF and BDBE's HR and Payroll management systems, Bankline (Natwest) and in other IT systems (including the BDBF and BDBE's email system).

**Why does the BDBF & BDBE process personal data?**

The BDBF and BDBE needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pension entitlements.

In some cases, the BDBF and BDBE needs to process data to ensure that it is complying with its legal obligations. For example, it is 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 is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the BDBF and BDBE has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the BDBF and BDBE to:

* run recruitment and promotion processes;
* maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), 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;
* 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 BDBF and BDBE 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 the BDBF and BDBE 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.

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).

Where the BDBF and BDBE processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring.

**Who has access to data?**

Your information will be shared internally and with our affiliated BDBF and BDBEs, including members of HR and Finance, your line manager, managers in the area in which you work and IT staff if access to the data is necessary for performance of their roles.

The BDBF and BDBE shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. The BDBF and BDBE may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The BDBF and BDBE also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services. Also data is shared with our external auditors, HMRC and where legal required for court orders, council for attachment of earnings orders, and the department of works and pension and job seekers allowance etc.

The BDBF and BDBE will not transfer your data to countries outside the European Economic Area.

**How does the BDBF & BDBE protect data?**

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

Where the BDBF and BDBE engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and BDBF and BDBE al measures to ensure the security of data.

**For how long does the BDBF and BDBE keep data?**

The BDBF and BDBE 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 set out in our Data Retention Policy.

**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 BDBF and BDBE to change incorrect or incomplete data;
* require the BDBF and BDBE to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. When we receive your request we will confirm whether the data has been deleted or the reasons why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s));
* object to the processing of your data where the BDBF and BDBE is relying on its legitimate interests as the legal ground for processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims;
* ask the BDBF and BDBE to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the BDBF and BDBE's legitimate grounds for processing data, and
* request that we transfer some of your data to another controller.

If you would like to exercise any of these rights, please contact the Data Protection Officer.

If you believe that the BDBF and BDBE has not complied with your data protection rights, you can complain to the Information Commissioner https://ico.org.uk/

**What if you do not provide personal data?**

You have obligations under your employment contract to provide the BDBF and BDBE 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 the BDBF and BDBE 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 the BDBF and BDBE to enter a contract of employment with you. If you do not provide other information, this will hinder the BDBF and BDBE's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

**Automated decision-making**

Employment decisions are not based solely on automated decision-making.

**Data Controllers –** contact details for the Data Controllers are as follows**:**

Stephen Whittaker – Blackburn Diocesan Board of Finance

Iain Parks – Blackburn Diocesan Board of Education

Diocesan Offices
Clayton House

Walker Office Park

Blackburn

BB1 2QE