



Supported Independence
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General Data Protection Regulation Policy

Privacy notice

1. As your employer, Supported Independence Ltd. needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company 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.

2. As a company supporting service users with mental health issues and learning disabilities, we may sometimes need to process your data to pursue our legitimate business interests, for example to safeguard service users, prevent fraud, for administrative purposes, for the reporting of potential crimes, for audits, etc.

The nature of our legitimate interest is first and foremost the best support for our service users as well as the running of the company. But legitimate interests are also linked to all areas of staff management such as recruitment and selection, performance management, health and safety, etc.

We will never process your data where these interests are overridden by your own interests.

3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as e.g. your manager, or in some cases, external sources, such as e.g. referees.

4. The sort of information we hold includes your application form, CV and references, your contract of employment and any amendments to it; 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; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy (even though such data is being collected anonymously without us being able to identify who provided it); and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of Supported Independence Ltd. You should refer to the Data Protection Policy in our Policies and Procedures as covered in your induction, but also available in each unit and from your line manager. (Currently a new version is being drafted and will be distributed ASAP).

6. 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 in order 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. We will also need this data to administer and manage statutory and company sick pay.
7. As a provider of 'Regulated Activity for Adults (& Children)' (therefore subject to the 'Safeguarding Vulnerable Groups Act 2006' and registered under 'Protection of Freedoms Act 2012') we need to apply for a DBS check for all staff or need to get access to one that staff have applied for themselves.
8. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, biometric data or sexual orientation, we will only hold these anonymously with no way of tracing who has supplied the information.
9. All service user units have CCTV cameras in the entrances (grounds and open areas, so no bathrooms, private rooms or offices) for the safety of service users and staff. All recorded data automatically gets deleted after 40 days. For further information regarding CCTV recording, please see our CCTV policy.
10. In addition, we may monitor computer use and company mobile telephone use, as detailed in our Policies and Procedures.
11. Other than as mentioned below, we will only 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, for instance we may need to pass on certain information to our external payroll provider, pension or other insurance schemes.
12. Due to the nature of our business of supporting service users from vulnerable groups, your personal data will be stored for a period of 50 years. This retention period is to comply with legislation regarding possible allegations many years hence. This extended retention period is also in support of your defence in case of potential future allegations against you.
13. If in the future we intend to process your personal data for a purpose other than that which it was collected for, we will provide you with information on that purpose and any other relevant information.

Your rights

14. Under the 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 request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing, as well as in certain circumstances the right to data portability.

15. 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.

16. You have the right to lodge a complaint to the Information Commissioner's Office if you believe that we have not complied with the requirements of the GDPR or DPA 2018 with regard to your personal data.

17. Supported Independence Ltd. is the controller and processor of data for the purposes of the DPA 2018 and GDPR.

18. If you have any concerns as to how your data is processed, you can contact Human Resources via hr@sisw.co.uk or you can write to us using the address of 27-29 Ashley Road, Bristol, BS6 5NJ.