

EMPLOYEE PRIVACY NOTICE

Data controller: Dogs Trust, 17 Wakley Street, London, EC1V 7RQ

Data Protection Compliance Manager: Tanny Massaquoi

Dogs Trust Promise

For over 50 years, we've promised never to put down a healthy dog. We keep our promises, and that includes treating your personal details with care.

We collect and process personal data relating to our employees to manage the employment relationship. We are committed to being clear about how we collect and use that data and to meeting our data protection obligations.

What information do we collect?

We collect and process a range of information about you. This includes:

- your name, address and contact details (including email address and telephone number, where applicable), your date of birth and your 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 us;
- information about your remuneration and reward, 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 and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- details about your driving licence, if you drive on our business as part of your role;
- information about your criminal record, where relevant for certain roles;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of paid and unpaid leave taken by you, including holiday, sickness absence, family-related leave 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, details of any capability proceedings involving you, 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 we need to make reasonable adjustments; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways. For example, data is collected:

- through on-line application forms, CVs, resumes or certificates;
- 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; and/or

- through interviews, meetings, web searches or other assessments.

In some cases, we collect personal data about you from third parties, such as references supplied by former employers, information from our occupational health provider, information from credit reference agencies and information from criminal records checks (where relevant) 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 do we need to process personal data?

We need to process data to enter into an employment contract with you and to ensure both sides meet their 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, pension and insurance policies.

In some cases, we need to process data to ensure that we are complying with our legal obligations and report to statutory bodies. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to check their earnings, 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, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of whom to contact in the event of an emergency), and records of employee contractual and statutory rights and obligations;
- operate and keep a record of disciplinary, grievance and capability processes (including the relevant investigations), to ensure acceptable conduct and performance within the workplace and to promote good management;
- 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 attendance 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 we comply with our duties in relation to individuals with disabilities, meet our 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 we comply 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 we rely 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 fulfill employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Where we process 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 and for statutory reporting. Data that we use for these purposes is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

For the reasons set out above, we do not therefore consider that our processing of your data is prejudicial to you.

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, other managers (where we judge it necessary) and IT staff (if access to the data is necessary for performance of their roles).

We share your data with third parties in order to obtain pre-employment references from other employers, obtain occupational health information, obtain information from credit reference agencies and obtain necessary criminal records checks from the Disclosure and Barring Service. We may also share your data with third parties should we decide to sell or effect a change in service provision of some or all of our business. In those circumstances, the data will be subject to confidentiality arrangements.

We also share your data with third parties that process data on our behalf, for example in connection with payroll, the provision of benefits and the provision of occupational health services.

Your data may be transferred outside the European Economic Area (EEA) if your employment with us requires you to work or travel outside of the EEA.

How do we protect data?

We take the security of your data seriously. We have 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 our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long do we keep data?

We will hold your personal data for the duration of your employment. The period for which your data is held after the end of employment is 7 years.

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 us to change incorrect or incomplete data;
- require us 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 we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Tanny Massaquoi, Data Protection Compliance Manager, at 17 Wakley Street, London, EC1V 7RQ. You can make a subject access request by completing our form for making a subject access request.

If you believe that we have not complied with your data protection rights, we suggest that you please let us know first. You may complain to the Information Commissioner, but we hope that we would be able to resolve your concerns without you needing to take this step.

What if you do not provide personal data?

You have some obligations under your employment contract to provide us with data. In particular, you are required to follow our procedures to request leave from work and to report absences from work and may be required to provide information about disciplinary or other matters, including capability, concerning you under the implied duty of good faith. You may also have to provide us 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 us to enter a contract of employment with you. If you do not provide certain information, this will hinder our ability to administer efficiently the rights and obligations arising as a result of the employment relationship.

Policy

For more information about our privacy policy, please visit our privacy section on our website:

<https://www.dogstrust.org.uk/privacy/>

You can change your preferences at any time by phoning 020 7837 0006 or by visiting [dogstrust.org.uk/keepintouch](https://www.dogstrust.org.uk/keepintouch).