

VSS Employee Data Protection Statement and Privacy Notice

This statement explains how VSS handles and uses personal data collected about employees (including board members). VSS is registered with the Information Commissioner's Office (ICO) with registration number –Z3197619

VSS are committed to protecting employee personal information and to being transparent about what information held. VSS understands its obligations to employees to help them understand how and why VSS process employee personal data. This notice tells employees about these uses and should be read in conjunction with the VSS data protection policy.

VSS data protection policy and procedures are governed by the Data Protection Act 2018 and, from 25th May 2018, the EU General Data Protection Regulation. The law in this area is changing rapidly and VSS anticipate this statement may be revised in line with guidance from the Information Commissioner's office.

Why VSS Hold Employee Personal Data

VSS are required to hold employee personal data for various legal and practical purposes, without which VSS would be unable to employ anyone.

Holding employee personal data enables VSS to meet various administrative and legal obligations (eg for tax purposes).

VSS will also process employee personal information in other circumstances, provided the employee has given their consent for VSS to do so.

Lawful basis for processing personal data

The lawful basis for processing the personal data of employees as described in this document is **to fulfil a public task**.

There is a contractual requirement for employees to provide much of the information detailed. Without this VSS will be unable to fulfil its obligations which could result in the contract terminating.

VSS may also store some of employee personal data in accordance with other privacy notices (eg if the employee is also a client).

Personal data held by VSS

The information VSS hold about employees is primarily information provided when applying for a job with VSS, supplemented by information generated in the course of employment.

- Employee name
- Employee contact details
- Unique personal identifiers and biographical information (e.g. date of birth, gender)
- Employee religious affiliation
- Photographs of the employee
- Financial information gathered for the purposes of administering fees and charges, paying salary and expenses, etc.
- Personal data provided for a specific purpose or purposes (for example, disability, catering preferences, etc.)
- Next of kin and their contact numbers
- Information related to the prevention and detection of crime and the safety of employees and visitors, including, but not limited to, CCTV recording
- Employee applications; details of employee career; references
- Employee contract of employment
- Performance reviews
- Disciplinary, grievance and capability procedures; accidents at work; and training provided.

Also:

- Employee visa requirements; copies of passports, visas, and other documents required to ensure compliance with Home Office requirements
- Details of employee education, qualifications and publications
- Information provided to VSS (for example, by filling in forms on the VSS website, or by corresponding with VSS by post, telephone, email or otherwise)
- Employee attendance at VSS or Organisation events

How Employee Personal Data Is Used By VSS

Employee data is used by VSS for a number of purposes including:

- Internal reporting and record keeping
- Administrative purposes (e.g. payment of salary and expenses, processing fees payments or to administer an event the employee registered for or attended)
- Giving key card access to parts of the premises
- Issuing references at employee request
- Contacting the employee, the employee next of kin, or other relevant contact in case of an emergency
- Inclusion in the VSS telephone/e-mail directory
- The promotion of VSS events
- Publicity, including images, online, in print and on social media (with employee consent)
- Publications, invitations and other communications

Communications to employees may be sent by post, telephone or a work email address. Employee personal mobile phone numbers will only be used if consent has been given.

As an employee, if you have concerns or queries about any of these purposes, or how VSS communicate with you, please contact VSS at the address given below. VSS will always consider a request by you to stop processing employee personal data (subject to any processing as required by Law or any Regulatory Body), and in addition, employee statutory rights are set out below.

Sharing employee data with others

Within VSS, personal data, including sensitive personal data, may be shared between employees, including Board members, who legitimately need the information to carry out their normal duties. VSS endeavours to ensure that sensitive personal data is only shared with colleagues with employee explicit consent. However, circumstances may arise where this data is shared with colleagues without gaining employee consent. This will only occur if it is necessary to protect employee vital interests or the vital interests of another person; or for certain other reasons where it is not possible or appropriate to gain employee consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations relating to equality monitoring.

VSS may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below.

Relevant data will be shared with TEO for the purposes of conducting a pay remit.

Relevant data will be shared with CSP for the purposes of maintaining pension details and contributions.

Relevant data will be shared with VSS payroll providers for the purposes of calculating salary/tax payments and may be shared with VSS Finance Department and Human Resources (for payment of salary & expenses).

Relevant data may be shared with auditing organisations for the purposes of verification of VSS business activities.

Relevant data may be shared with employee next of kin but only with employee consent or in an emergency.

Relevant data may be shared with external bodies, such as Home Office or police, where we have a legal obligation to do so. We may also share information for the prevention and detection of fraud.

With employee permission VSS may share information about you for publicity purposes online, in print and on social media.

Otherwise, VSS does not share data with any third party, except as allowed for in other privacy notices or required by law. VSS do not sell employee personal data to third parties under any circumstances, or permit third parties to sell on the data VSS have shared with them.

Transfer of personal data to other countries

Where data is shared within the UK, or the European Union (EU), the third party will be required to comply with and safeguard the data under the terms of all Data Protection legislation and appropriate EU regulations.

How long data is kept

VSS will keep employee personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with VSS Data Retention and Disposal Policy. Data will be securely destroyed when no longer required.

Where you exercise the employee right to erasure, VSS will continue to maintain a core set of personal data (name, dates of working at VSS and date of birth) to ensure VSS do not contact you inadvertently in future, and to maintain employee records for archive purposes. VSS may also need to retain some financial records about you for statutory purposes (e.g. accounting matters).

Employee Rights

As an employee, you have the following rights

To be informed	This Privacy Notice provides the information you are entitled to receive
Access	Please contact VSS if you would like confirmation that employee data is being processed and access to employee personal data. There is no charge for VSS providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).
Rectification	Please inform VSS of any data which you would like rectified and VSS will usually respond within a month of the request. VSS will pass on the changes to any third parties who need to change their records and let you know this has been done.
Erasure	You may exercise your employee right to have employee personal data erased in a number of circumstances (eg if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible VSS will comply with all such requests, though some details are part of VSS' permanent records (eg financial transactions, dates of employment) which cannot reasonably be deleted.

Restrict processing	<p>You can tell VSS to keep employee data but must stop processing it, including preventing future mailings and communications.</p> <p>If possible VSS will inform any third parties to whom your employee data has been disclosed of your requirement.</p>
Data portability	Where possible VSS will provide the data to you in a portable format suitable to fulfil this requirement.
To object	<p>If possible, VSS will stop processing employee data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).</p> <p>VSS will stop processing employee data if you object to processing for purposes of research and statistics.</p>
Not to be subject to automated decision-making including profiling	VSS do not use any automated decision-making.

VSS reserves the right to determine what information must continue to be held in order to fulfil VSS employment contracts.

Employees have the right to lodge a complaint with the Information Commissioner’s Office at <https://ico.org.uk/concerns>.

Further information

The controller for employee personal data and VSS Data Protection Officer can be contacted at;
 Data Protection Officer, Victims & Survivors Service, 1st Floor, Seatem House, 28-32 Alfred Street, Belfast, BT2 8EN or via dpo@vssni.org

The VSS Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. Please contact the DPO if you have any concerns or questions about the above information or you wish to ask VSS not to process employee personal data for particular purposes or to erase employee data. Where you have specific requests relating to how VSS manage employee data, VSS will endeavour to resolve these, but please note that there may be circumstances where VSS cannot comply with specific requests.

VSS will publish on the VSS website any changes VSS make to this data protection statement and notify employees by other communication channels where appropriate.