



Employee Privacy Notice

Introduction

Open Awards is committed to maintaining the accuracy, confidentiality, security; and the fair and transparent processing of personal information. This privacy notice explains what personal data we collect and how and why we collect it. It further explains how we store data, who we share data with and your rights in relation to the personal data you provide to us.

This privacy notice applies to the personal information of all individuals who are employed by Open Awards, seek to be, or were employed by Open Awards (collectively an employee) and applies to all the personal data we collect. This is in compliance with current data protection law, in particular the UK General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA 2018).

About Open Awards

Open Awards is a company Limited by Guarantee (Registered No. 5462874) and a registered charity (Charity No. 1113612). Our registered address is Open Awards, Estuary Commerce Park, 17 De Havilland Drive, Speke, Liverpool, L24 8RN.

We are an Awarding Organisation regulated by Ofqual and an Access Validating Agency approved by the Quality Assurance Agency for Higher Education (QAA). We also approve a range of unregulated, or 'quality endorsed', courses which are required to meet the same set of quality standards as all our other provision.

Open Awards is registered as a 'data controller' with the Information Commissioner (ICO), in relation to the processing of any personal data you provide to us when working for us.

What is Personal Information?

Personal information, also known as personally identifiable information or personal data, for purposes of this Privacy Notice means any information that directly and clearly identifies an individual, or can be used in combination with other information to identify an individual.

Personal information does not include such information if it is anonymous or if it has been rendered de-identified by removing personal identifiers.

Examples of personal information include:

- An individual's name
- An individual's photograph.
- Employee ID number.
- Home address.
- Home phone number.
- Personal email address.
- Names of family members.
- Date of birth.

What is Sensitive Personal Information?

Sensitive personal information is a subset of personal information that may be more sensitive in nature for the individual concerned.

- Race and ethnic information.
- Sexual orientation.
- Political/religious beliefs.
- Social security or other taxpayer/government issued identification numbers.
- Financial information.
- Health or medical information.
- Criminal records.
- Trade union membership.

What personal data does Open Awards collect and process?

We collect and maintain different types of personal information in respect of people we employ, who seek to be employed, or were employed by us, including the personal information contained in:

- Curriculum vitae and/or applications;
- references and interview notes;
- photographs and video;
- letters of offer and acceptance of employment;
- mandatory policy acknowledgement sign-off sheets;
- payroll information; including but not limited to national insurance number, bank details;
- wage and benefit information;
- forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care;
- beneficiary and emergency contact information.
- Residency and work permit status, nationality and proof of identification (passport information).
- Records of work absences, holidays/paid time off, entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing our policies).

- Forms or documentation relating to your physical or mental health or condition;
- Documentation in order to comply with legal requirements and obligations to third parties
- Acknowledgements regarding our policies, including staff handbooks, conflicts of interest policies and computer usage policies.
- Date of resignation or termination, reason for resignation or termination, information relating to termination of employment.

In addition to the examples listed above, personal information also includes information such as:

- name, home address, telephone number, personal email address, date of birth, national insurance number, emergency contact number and any other information necessary to Open Awards business purposes, which is voluntarily disclosed in the course of an employee's appointment or application for employment with Open Awards.

How we Collect Personal Information?

Open Awards collects personal information directly from you and it is only collected for legitimate business purposes. Where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources e.g. references, doctors reports). Any data collected will be processed only for the purposes for which it has been submitted in accordance with your contract of employment.

How we use the Personal Information we collect?

The personal information collected is used and disclosed solely for our business purposes and to meet our responsibilities both statutory and otherwise, including establishing, managing or terminating your employment relationship with Open Awards. Such uses include:

- determining eligibility for initial employment, including the verification of references and qualifications;
- administering pay and benefits;
- processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- establishing training and/or development requirements;
- conducting performance reviews and determining performance requirements;
- gathering evidence for disciplinary action, or termination;
- grievance and internal investigation activities;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable employment laws (e.g. health and safety);
- business travel and other reimbursable expenses;
- development and training;
- absence monitoring;
- auditing, compliance, and risk management activities;
- conflict of interest reporting;
- maintaining directories of employees
- ensuring the security of company-held information; and

- such other purposes as are reasonably required by Open Awards

We may also process your personal data if required by government or law, such as for crime prevention or fraud.

Monitoring

We reserve the right to monitor telephone, email, voicemail, internet and other communications. In order to carry out its legal obligations as an employer (such as ensuring the Employee's compliance with the Company's IT related policies), and for other business reasons, the Company may monitor use of systems including the telephone and computer systems, and any personal use of them by automated software or otherwise. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Who do Open Awards share personal data with?

We will not share information about you with third parties without your consent unless the law allows or requires us to.

Your personal information may be shared for the following purposes:

- In order to carry out the uses of personal information described above in "How we use the Personal Information we collect".
- When using or collaborating with third parties to provide services such as Pension and Life Insurance for Open Awards employees.
- HMRC for payroll purposes;
- Where required by law, by order or requirement of a court, administrative agency, or government tribunal, which includes in response to a lawful request by public authorities, including to meet national security or law enforcement requirements or in response to legal process.
- To seek advice from our lawyers and other professional advisers.

We will only share those details which are necessary for the purpose and endeavour to maintain the security of this information.

Where do we store personal data?

All personal information provided to us is stored on secure servers, or on the secure servers of sub-contractors that we have engaged to provide services on our behalf. The security of personal information is vitally important to us. Our HR portal houses all personal data and is accessed by employees through their own secure password. Personal data for payroll purposes is held securely on our payroll software (SAGE Payroll).

Application forms, appraisal/performance review documents, and any other forms, documents or letters containing personal data are held on our secure servers accessible only by authorised staff. Open Awards have an ICT policy in place that prohibits the sharing of passwords.

How does Open Awards protect personal data?

Open Awards is committed to maintaining physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorised access, copying, use, modification or disclosure. We take all reasonable steps to ensure our staff is aware of their obligations in relation to the security and confidentiality of personal data and the lawful processing of any personal data shared with them.

How long does Open Awards keep personal data?

Except as otherwise permitted or required by applicable law or regulatory requirements, we will retain your personal information only for as long as we believe it is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

You may request that we delete the personal information about you that we hold. There are instances where applicable law or regulatory requirements allow or require us to hold personal information. In the event that we cannot delete your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Open Awards has a comprehensive Data Retention Policy which covers all data we hold and is available in the staff handbook.

Access to your information and correction

You have the right to request a copy of the personal information that we hold about you by making a 'Subject Access Request' under the Data Protection Act 2018. We will:

- respond within one month of receiving your request;
- give you a description of the data we hold;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in a clear format

To make a request for information or to notify us of changes to your details, please make your request in writing to the Director of Finance and Resources anita.till@openawards.org.uk.

Open Awards strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage you to bring it to our attention if you think that our collection or use of information about you is incorrect, unfair, misleading or inappropriate. Any concerns can be raised with the Director of Finance and Resources anita.till@openawards.org.uk.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment, please keep us informed of such changes by informing the Director of Finance and Resources in writing.

Changes to our privacy notice

Open Awards recognises that privacy and data protection concerns may change and evolve over time.

If we make any changes to this privacy notice we will update you by email.

Contact details

If you have any questions or concerns with regard to this notice or our use of personal data please contact the Director of Finance and Resources anita.till@openawards.org.uk.

Declaration

You are confirming you have read and understood this document once you have accessed it through your self-service dashboard in HR Works. It is therefore important you let the Director of Finance and Resources or your line manager know if there is anything you do not understand.