**Employee Privacy Policy for Harmony Community Care Services.**

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**1.0 Introduction**

Harmony Community Care Services (Harmony CCS Ltd) is a company organised under the laws of the United Kingdom that exists to provide domiciliary care services. We are registered to provide these services and are regularly inspected by the Regulation and Quality Improvement Authority (RQIA).

Harmony CCS Ltd. Limited trades under “Harmony Community Care Services” and operates at 44-46 City Business Park Belfast BT17 9GX

In order to provide these services it is necessary to advertise, identify, select, recruit and

train new employees which requires us to collect and process personal information about

you.

Personal information means any information about you from which you can be identified,

but it does not include information where your identity has been removed (anonymous

data).As the ‘controller’ of personal information, we are responsible for how that data is

managed. The General Data Protection Regulation (GDPR), which applies in the United

Kingdom and across the European Union, sets out our obligations to you and your rights in

respect of how we manage your personal information.

As the ‘controller’ of your personal information, we will ensure that the personal

information we hold about you is:

* Used lawfully, fairly and in a transparent way
* Collected only for valid purposes that we have clearly explained to you and not used
* in any way that is incompatible with those purposes
* Relevant to the purposes we have told you about and limited only to those purposes
* Accurate and kept up to date
* Kept only as long as necessary for the purposes we have told you about
* Kept securely

If you have any questions about this privacy policy or would like further explanation as to

how your personal information is managed then please contact us (see Section 10).

This document provides the information as required by GDPR under your right to be

informed.

**2.0 Personal Data Processed**

In our role as an employer, and because of the nature of our business, we process a number

of different categories of data from our employees during and after your working

relationship with us. This includes:

* Name
* Contact details (postal address, phone number, email address)
* Bank details
* Age / date of birth
* Gender
* Marital status
* Driving licence number
* Photograph
* Payroll records (benefits, salary, tax status, etc.)
* Performance management records (direct observations, appraisals, supervisions,
* disciplinary, grievance)
* Training and competency records
* Absence records (annual leave, etc.)
* Next of kin contact details GP contact details
* Recruitment records (including employment history, references, right to work, etc.)
* National Insurance number
* Extra information you choose to tell us (in writing or verbally)

Certain information that we process is classed as ‘special category data’. It is sensitive by

nature. We have a higher duty of care in how we process this:

* Religion
* Medical and health information (including sickness details)
* Nationality or ethnicity
* Criminal cautions or convictions
* Motoring convictions

**3.0 Purposes of Processing Personal Information**

In order to employ and support you during your employment with Harmony Community Care Services we will

process personal data.

Purpose of processing Examples

Maintaining employee

files

* Records of recruitment with Harmony Community Care Services
* To maintain accurate and up to date personal details,
* including emergency contacts
* Managing training needs, delivering or arranging training
* and assessing competencies
* To receive and record records of absence (including annual
* leave, sick notes, Return to Work, MATB1, etc.)
* To record performance management activities (including
* appraisals, supervisions, etc.)
* To record and manage statutory meetings including
* communication with our employees (including disciplinary
* or grievance)
* To process and maintain up to date criminal conviction
* and caution information, where relevant to your role
* To receive and process records of resignation from
* employment with Harmony Community Care Services
* Finance and Payroll To record and process expense payments for employees To record and process payroll for employees
* Provision of service Providing access to company equipment, vehicles and
* facilities (including phone, software and applications)
* To issue and renew ID badges to all employees
* The provision of care (including covering placements,
* communication, records, training and competency assessment, reporting incidents)
* The provision of service (including arranging travel and accommodation, records, communication)
* Investigations and regulatory compliance
* To receive, record and process notifications, accidents and incidents as required with the appropriate external regulators (including HSCB, RQIA, NMC, NISCC, Access NI,HSENI, RIDDOR)
* To receive, record and investigate complaints received about the service
* To monitor and ensure compliance with National Minimum Wage and National Living Wage Standards
* To receive, record and process insurance claims
* Reporting and business analysis
* To conduct and support internal and external audits
* To monitor and report on the performance of the business and compliance
* To send, receive and analyse employee feedback

**4.0 Access to Personal Data**

In order to operate our business and run our recruitment we rely on third parties to provide

specialist support to us. To provide this support they will have access to, or a duty of care

over your personal information. These third parties are:

* IT and telecoms support companies – to ensure the safe, secure and resilient

operation of our IT infrastructure including computers, servers, phones and mobile

devices

* Software support companies – to provide specialist support and resolve issues with

the software that we run, for example the systems we use to store and manage your

recruitment progression

* Communication service providers – such as Royal Mail and network providers Relevant authorities – such as the HSCB, RQIA, NMC, NISCC, DVLNI, HMRC
* Service providers – such as training providers
* Insurance providers
* Data Management and Archiving Service Providers

We will share relevant information within Harmony Community Care Services during and after your employment

where this is necessary, and in line with our purpose for processing.

Due to the nature of our business and the service we provide we may share minimal

personal data with our customers to enable the safe and effective delivery of care, for

example we may share your name with a customer who you have agreed to work with.

We will not share, sell or trade your personal information with any other third party without

your consent, unless there is a legal reason to do so.

**5.0 International Transfer**

All your personal data is stored and processed on systems that are within the European

Economic Area (EEA) and offer the same level of legal protection and rights over your data.

In certain situations, we transfer your personal information to the following countries which

are located outside the European Economic Area (EEA):

- A country where you are resident or located in temporarily

This will be for the purposes of communicating with you about your employment and the

services we provide while you are outside of the UK.

This international transfer is under Article 49(1)(b) – the transfer is necessary for the

performance of a contract between the data subject and the controller

Such countries do not have the same data protection laws as the United Kingdom and EEA.

Any transfer of your personal information will be subject to appropriate or suitable relevant

safeguards that are designed to help safeguard your privacy rights and give you remedies in

the unlikely event of a misuse of your personal information.

If you would like further information please contact us.

**6.0 Retention Period**

The data we hold will have a different retention period, dependent on the type of data and

how long we are legally required to retain the data by law.

Type of data Retention period

Employee file 7 years post employment

Finance details 3 years post employment from the end of the

tax year they relate to

Pension or retirement benefit details 7 years post employment

Details relating to the provision of care

to customers

Until the customer data record is deleted, in

line with Harmony Community Care Services Retention Schedule.

**7.0 Legal Basis for Processing**

We rely on the following grounds within the GDPR:

-Article 6(1)(b) – processing is necessary for the performance of our contracts to

provide individuals with care and support services and you with employment

- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with the

law or regulatory frameworks

- Article 6(1)(f) – in pursuit of legitimate interests

o To analyse and report on the performance and compliance of the business

o Providing access to company equipment, vehicles and facilities (including

phone, vehicles, software and applications)

o To send, receive and analyse employee feedback.

GDPR recognises that additional care is required when processing special category

(sensitive) data such as your health. We process this under the following grounds within

GDPR:

- Article 9(2)(h) – Provision of health or social care or management of health or social

care systems or services Article 9(2)(b) – Legal obligations under employment or social benefit law

-Article 9(2)(f) – Establishment, exercise or defence of legal claims or court.

**8.0 Your Rights**

Under the GDPR you have important rights free of charge. In summary, those include rights

to:

* Fair processing of information and transparency over how we use your use personal

information

* Access to your personal information and to certain other supplementary information

that this Privacy Policy is designed to address

* Require us to correct any mistakes in your information which we hold
* Require the erasure (i.e. deletion) of personal information concerning you, in certain

situations. Please note that if you ask us to delete any of your personal information

which we believe is necessary for us to comply with our contractual or legal

obligations, this may affect our ability to provide employment or to fulfil our

contractual duties with you

* Receive the personal information concerning you which you have provided to us, in a

structured, commonly used and machine-readable format and have the right to

transmit those data to a third party in certain situations

* Object at any time to processing of personal information concerning you for direct

marketing

* Object to decisions being taken by automated means which produce legal effects

concerning you or similarly significantly affect you

* Object in certain other situations to our continued processing of your personal

information

* Otherwise restrict our processing of your personal information in certain

circumstances

* Claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office (ICO) on Individuals’ Rights Under the GDPR.

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-dataprotection-regulation-gdpr/individual-rights/>

**9.0 Security of Data**

The confidentiality and security of your information is of paramount importance to us. We

have appropriate organisational and technical security measures in place to prevent

personal information from being accidentally lost, or used or accessed in an unauthorised

way. We limit access to your personal information to those who have a genuine business

need to know it. Those processing your information will do so only in an authorised manner

and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will

notify you and any applicable regulator of a suspected data security breach where we are

legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information

and your computers and devices against fraud, identity theft, viruses and many other online

problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM

Government and leading businesses.

**10.0 Contacting Us and Further Information**

We hope that we can resolve any query or concern you raise about our use of your

information. If you have any questions about this policy or our use of your data please

contact the Data Protection Officer in the first instance.

The GDPR also gives you right to lodge a complaint with a supervisory authority, in

particular in the European Union (or European Economic Area) state where you work,

normally live or where any alleged infringement of data protection laws occurred. The

supervisory authority in the UK is the Information Commissioner who may be contacted

at ico.org.uk/concerns/ or by phoning 0303 123 1113.

Data Protection Officer

David Warnock

Harmony Community Care Services 44-46 City Business Park Derriaghy Belfast BT17 9GX

Data Controller Details

Harmony CCS Ltd.

How to Contact Us

You can contact us by:

* Email – [hr@harmonyccs.co.uk](mailto:hr@harmonyccs.co.uk)
* Post – 44-46 City Business Park BT17 9GX
* Telephone – 028 92604464

If you would like to exercise any of those rights, please:

1. Contact us using the details above – making clear that you wish to exercise one of

your privacy rights

2. Let us have enough information to identify you (e.g. your name and address),

3. Let us have proof of your identity and address (a copy of your driving licence or

passport and a recent utility or credit card bill)

4. Let us know the information to which your request relates, including any account or

reference numbers, if you have them

Updates to this Policy

From time to time we may update this policy. The latest version of our Employee Policy will

always be available on our website. You may also request for a copy to be printed for you. If

you require the policy in a different format please contact us and we will do our best to

accommodate your request.

Further Information

For further information on GDPR including how companies process your data please visit:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-dataprotection-regulation-gdpr>