

## Privacy Policy

Approved by:	Trustees
Date:	1 <sup>st</sup> May 2025
Review Date:	1 <sup>st</sup> May 2027

### Who We Are and What We Do

1. We are a charity based in Chesham empowering young people in Africa (and the UK) to help themselves by developing the skills and knowledge needed to find gainful employment or start their own business.
2. We are a charitable company limited by guarantee, with company number 02576450, and registered charity number 1041574.
3. We are also a Data Controller, registered with the Information Commissioner's Office, Registration Number ZB151409.

### Statement and Purpose of Notice

4. Workaid collects and processes data relating to its employees, volunteers, donors, customers and others in order to manage its relationship with them. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### What Information Do We Collect?

5. For an employee, we may collect and process the following information:
  - a. your name, address and contact details, including email address and telephone number, date of birth;
  - b. the terms and conditions of employment;
  - c. details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us;
  - d. information about your remuneration, including entitlement to benefits, such as pensions and insurance cover;
  - e. details of your bank account and national insurance number;
  - f. information about your next of kin, and emergency contacts;
  - g. information about your nationality and entitlement to work in the UK;
  - h. details of your schedule (days of work and working hours) and attendance at work;
  - i. details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals and the reasons for the leave;
  - j. photographs or videos;
  - k. details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence; and
  - l. information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments.
6. For a volunteer, we may collect and process the following information:
  - a. your name, address and contact details, including email address and telephone number;
  - b. information about your next of kin, dependants and emergency contacts;

- c. information about your nationality and entitlement to work in the UK;
  - d. details of your schedule and attendance;
  - e. photographs or videos; and
  - f. information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments.
7. For a donor, we may collect and process the following information:
- a. your name, address and contact details, including email address and telephone number;
  - b. information about the donations you have made including financial or In Memory details; and
  - c. information regarding Gift Aid.
8. We may collect this information in a variety of ways. For example, data might be collected through application forms and/or CVs; from forms completed by you at the start of or during employment or volunteering (such as benefit nomination forms); from correspondence with you; through interviews, meetings or other assessments; through the website; or over the telephone. Whenever we ask for information from you we will explain why we are asking for it (including by reference to this policy), and you will always be given a choice about how we communicate with you.
9. In some cases, we may collect personal data about you from third parties, such as references supplied by former employers.
10. Data will be stored in a range of different places, including in your electronic file, in our HR management systems, email system and in other IT systems.
11. We may collect aggregated or anonymous information when you visit our website or interact with our content. For example, we may collect information about the services you use and how you use them, such as when you watch a video online, visit our website or view and interact with our posts and content.

### **Our Legal Basis for Processing Personal Data**

12. We will always make sure that we consider why we are processing your personal data and identify our legal basis for doing so. Often this will be because you have given us your consent. We may also process your data where we are pursuing our legitimate aims and have assessed that the processing is not likely to be too intrusive, or to unduly infringe on your rights and freedoms. In legal terms, this is called the “legitimate interests” basis.
13. For an Employee:
- a. We need to process your personal data to enter into an employment contract with you and to meet our 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 benefits, pension and insurance entitlements.
  - b. We may need to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.
  - c. 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:

- i. maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
    - ii. operate and keep a record of employee performance and related processes to confirm compliance with our internal policies and procedures, to plan for career development, and for succession planning and workforce management purposes;
    - iii. ensure effective general human resources (HR) and business administration;
    - iv. provide references on request for current or former employees; and
    - v. respond to and defend against legal claims.
  - d. Some special categories of personal data, i.e. sensitive personal data, such as information about health or medical conditions, are processed by us where we have a legitimate interest to do so and to carry out employment law obligations (such as those in relation to employees with disabilities and to ensure the health and safety of all staff);
  - e. We also collect information relating to your sickness records to maintain a record of your sickness absence and copies of any doctor's notes or other documents supplied to us in connection with your health; and
  - f. Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of carrying out our legal obligations and exercising specific legal rights in relation to employment.
14. For a Volunteer:
- a. We need to process your personal data to enter into a volunteer agreement with you and to meet our obligations under Health & Safety;
  - b. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a volunteer's entitlement to work in the UK; and
  - c. In other cases, we have a legitimate interest in processing personal data before, during and after the end of the volunteer relationship. Processing volunteer data allows us to:
    - i. maintain accurate and up-to-date volunteer records and contact details (including details of who to contact in the event of an emergency); and
    - ii. operate and keep a record of volunteer performance and related processes to confirm compliance with our internal policies and procedures.
15. For a Donor:
- a. We need to ensure the details of your donations are administered in the most effective way in accordance with our internal contract, accounting and administrative functions;
  - b. In some cases, we need to coordinate the collection of donated tools and equipment; and
  - c. We need to process information regarding donations that are eligible for Gift Aid.

### **Who Has Access to Data?**

- 16. Your information may be shared internally, including with staff and volunteers who are authorised.
- 17. IT staff may require access to the data as necessary for the performance of their roles.
- 18. We may share your data with third parties in order to:

- a. obtain advice from professional advisers, including accountants, auditors, lawyers, insurers, bankers, and others;
  - b. help third party service providers who provide products and services to us such as payroll, pension scheme and benefits administration, HR, performance management, training, credit card processing, Gift Aid, processing, financial donor management, IT, etc; and
  - c. facilitate the detection of crime or the collection of taxes or duties.
19. We also share your data with third parties that process data on our behalf in connection with payroll and the provision of benefits.
20. We may also disclose your personal data to third parties when we determine that disclosure is required to protect our rights, property, or personal safety, or to respond to requests by public, regulatory, or law enforcement authorities, including to meet national security or law enforcement requirements. Here are some examples of third parties we may use:
- a. where we work with subsidiaries or subsidiaries;
  - b. where we sign a contract with a third-party supplier to carry out services for us. This may include companies we use to send emails, post and more;
  - c. where you register for a fundraising event or activity;
  - d. where a third party sends us your personal data because you have given permission for them to share it, (e.g., where you set up an online giving fundraising page);
  - e. where we might use your phone number or email address to communicate with you on social media. This would be limited to updates about our work and stories that we think you might be interested in, which might appear in the form of content on your newsfeed;
  - f. where we legally have to share information. For example, if you make a Gift Aid declaration to enable us to claim Gift Aid on donations that you make, we have to share your name and address with HMRC so that they can audit our claim; and
  - g. where we transfer personal data to a third-party vendor for processing (e.g. payroll services).

### **Choice**

21. We do not currently share your personal data with third-parties other than:
- a. to our affiliates or within our organisation;
  - b. to our service providers, suppliers and contractors who act on our behalf; and
  - c. regulators such as the Information Commissioner's Office (ICO), the Charity Commission, and Fundraising Regulator.
22. We never swap or sell your details with any other organisation for marketing purposes. However, if we decide to do so in the future, we will offer you the opportunity to choose (opt-out) before your personal data is disclosed to a third-party controller (i.e. a non-service provider). Also, if we decide to use your data for purposes that are different from the purpose(s) for which it was originally collected or subsequently authorised by you, we will offer you the opportunity to choose (opt-out) before such use.

### **Transfers Outside the United Kingdom**

23. Data which we collect from you may be stored and processed in and transferred to countries outside of the UK. For example, this could occur if we have group companies located in a country outside the UK or one of our service providers is situated in a country outside the UK.

24. We will only transfer your personal data outside the UK where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, e.g. by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the UK.
25. To ensure that your personal data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your personal data with. This ensures your personal data is treated by those third parties in a way that is consistent with the data protection laws.

### **How Do We Protect Data?**

26. We take the protection of your data seriously. We have internal policies and controls in place to try and 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.
27. Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, and such third parties 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?**

28. Unless a longer retention period is required or permitted by law, we will only hold your data on our systems as defined in our data retention policy to fulfil the purposes outlined in this privacy policy or until you request that the data be deleted.
29. Even if we delete your data, it may persist on backup or archival media for legal, tax or regulatory purposes.

### **Your Rights**

30. As a data subject, you have a number of rights. You can:
  - a. access and obtain a copy of your personal data on request;
  - b. require us to change incorrect or incomplete personal data;
  - c. require us to delete or stop processing your data in certain circumstances such as where the data is no longer necessary for the purposes of processing;
  - d. object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing, in certain circumstances; and
  - e. 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.
31. If you would like to exercise any of these rights, please contact your line manager for HR related matters, or [jason.paul@workaid.org](mailto:jason.paul@workaid.org) for all other matters.

### **Complaint Resolution**

32. If you believe that we have not complied with this privacy notice or your data protection rights, you have the right to file a complaint with the UK ICO, however, we hope that you will attempt to resolve the complaint with us first.
33. In addition, if you have any inquiries or complaints about the handling of your personal data, or about our privacy practices generally, please contact us at: [jason.paul@workaid.org](mailto:jason.paul@workaid.org) and we will respond to your inquiry promptly.

### **Close-Circuit Television (CCTV)**

- 34. Workaid uses CCTV in our offices for the safety and security of premises, staff, volunteers and third parties. CCTV footage can be disclosed to those organisations acting on official authority, including the police.
- 35. We process data from CCTV for the purposes of our legitimate interest of protecting our premises, and for carrying out tasks in the public interest/substantial public interest by protecting our people and supporting investigations into crime and fraud, for example.
- 36. You have the right to view any personal data recorded on our CCTV. In certain circumstances, we may be able to provide you with a redacted copy of the recording, unless doing so would require disproportionate effort on our part.

### **What If You Do Not Provide Personal Data?**

- 37. You have some obligations under your employment contract to provide us with certain personal data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters 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.
- 38. 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 other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

### **Changes to this privacy notice**

- 39. We reserve the right to change this notice policy at any time as we may deem necessary from time to time or as may be required by law. We will provide you with a new privacy notice when we make any substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.
- 40. Please do revisit this policy each time you consider giving your personal data to Workaid.