



**Privacy Policy**

## Contents

1.0 Scope and Exclusions .....	3
2.0 Policy Statement .....	3
3.0 Implementation of Policy .....	3
3.1 Personal data .....	3
3.2 Personal Information Promise.....	3
3.3 Collection and use of PII and SPII .....	3
3.4 PII Created During Employment .....	4
3.4.1 A professional photograph .....	4
3.4.2 Leave and absence management information as necessary:.....	4
3.4.3 Performance management information: .....	4
3.4.4 Training and development information: .....	4
3.4.5 Recording information (to the extent authorised by applicable laws): .....	4
3.4.6 Contract claims, complaints and disclosures information: .....	4
3.4.7 Equality and diversity information:.....	4
3.4.8 General information: .....	4
3.5 How gbp group Collect Information.....	5
3.5.1 Email: .....	5
3.5.2 Directly from you:.....	5
3.5.3 From third parties:.....	5
3.6 How Your Personal Data is Used .....	5
3.6.2 Recruitment and Selection:.....	5
3.6.3 Ongoing Management of all Aspects of Colleague Relationships With gbp group: .....	5
3.6.4 Upon termination of employment and beyond: .....	6
3.7 Data Sharing .....	6
3.8 Your rights as a Data Subject .....	6
3.9 Personal Information Promise.....	7
4.0 Documentation Control.....	8

## 1.0 Scope and Exclusions

This policy applies to all gbpartnerships colleagues.

## 2.0 Policy Statement

gbp is committed to protecting the privacy of all colleagues and security of all personal information. This policy will ensure that gbp are operating within the requirements of GDPR and the Data Protection Act 2018 and adhering to procedures regarding 'personal data'.

This page summarises the nature of the information that is stored by gbp, why and how it is used, your rights in regard to this data, as well as the protections in place to safeguard it.

This document may be amended from time to time to keep it up to date with legal requirements and the way in which we operate our business. Significant changes to this document will be publicized to colleagues via email and Sharepoint/staff comm's.

## 3.0 Implementation of Policy

### 3.1 Personal data

Personally identifiable information (PII) and Sensitive Personally Identifiable Information (SPII), as defined by GDPR, is any information which can be used to identify an individual, for example names, addresses, and date of birth.

### 3.2 Personal Information Promise

gbp has signed up to the Personal Information Promise to demonstrate our commitment to data protection. See 3.9.

### 3.3 Collection and use of PII and SPII

gbp may collect the following personal information about colleagues for the purposes described in this policy, all of which are required for us to either enact the terms of employment, or to comply with legislative requirements, unless explicitly referenced:

- **During Recruitment and Selection**  
Information from CV's:  
Skills experience & qualifications as well as references if successful, interview and assessment data
- **Upon Offer of Employment**  
**Personal details**, including previous or maiden name (if applicable), gender, nationality, date of birth, age, personal contact details.  
**Right to work information**, including national ID number, eligibility-to-work information, proof of identity (e.g., passport/driving licence) and bank account details.  
**Regulatory information**: any criminal record or credit background checks which may be necessary, and any proof of certifications/qualifications required under the terms of offer.  
**Other information** including emergency contact information, details of any disability and any reasonable adjustments required as a result.

### **3.4 PII Created During Employment**

#### **3.4.1 A professional photograph**

#### **3.4.2 Leave and absence management information as necessary:**

Attendance records, absence records, holiday dates, requests and approvals and information related to family leave or other special or statutory leave, absence history, fit notes, details of incapacity, details of work impact and adjustments, details of medical reports from GP and/or Occupational Health, Manager and Human Resources (HR) communications, return to work interviews (if GP/occupational health records are required, a separate permission will be sought).

#### **3.4.3 Performance management information:**

Colleague and manager feedback, appraisals and performance review information, outcomes and objectives, talent programme assessments and records, succession plans, formal and informal performance management process records.

#### **3.4.4 Training and development information:**

Data relating to training and development needs or training received, or assessments completed.

#### **3.4.5 Recording information (to the extent authorised by applicable laws):**

gbp use video conferencing (e.g., Microsoft Team). This software has a recording capability. You will be advised of the relevant privacy policy through the software if the call was recorded. In line with gbp group email and communications policy, passive logging of emails and internet traffic is carried out for security purposes.

#### **3.4.6 Contract claims, complaints and disclosures information:**

Subject matter of employment or contract-based litigation and complaints, pre claim conciliation, communications, settlement discussions, claim proceeding records, Contract involvement in incident reporting and disclosures.

#### **3.4.7 Equality and diversity information:**

(where authorised by law and consent provided voluntarily)

#### **3.4.8 General information:**

Information regarding gender, age, nationality, religious belief, sexuality and race (stored anonymously for equal opportunities monitoring purposes).

### **3.5 How gbp group Collect Information**

**Personal information is collected from a variety of sources as per below:**

#### **3.5.1 Email:**

Including shared mailboxes or an individual account; instant messages also may be recorded electronically or manually.

#### **3.5.2 Directly from the colleague:**

Typically, this is information directly to HR or Line Managers or entered onto our HR systems as part of ongoing employment starting from the recruitment stage. In addition, further information about you will come from your managers, HR or occasionally from your colleagues.

#### **3.5.3 From third parties:**

e.g. references from a previous employer, medical reports from external professionals (where required with additional permission), information from tax authorities (to process tax correctly), benefit providers or where a third party is employed to carry out a background check (where authorised by applicable law).

### **3.6 How Your Personal Data is Used**

Subject to applicable law, personal data may be stored and processed by us for the following purposes:

#### **3.6.2 Recruitment and Selection:**

- To evaluate applications for employment and make decisions in relation to selection of colleagues.
- Pre-employment screening including, where relevant and appropriate, identity check, right to work verification, reference check, credit check, financial sanction check, criminal record checks.
- To make a job offer, providing contracts of employment or engagement and preparing to commence employment or engagement where an offer is accepted.
- To contact applicants should another potentially suitable vacancy arise, where consent has been provided.
- To deal with any query, challenge or request for feedback received in relation to gbp's recruitment decisions.

#### **3.6.3 Ongoing Management of all Aspects of Colleague Relationships With gbp:**

- Where required by law, we will comply with lawful requests by public authorities, court orders, government regulations, or regulatory authorities to ensure the company remains compliant with legislation and regulations.
- To comply with all relevant legislation that applies to us as a business, including tax, national insurance contributions and health and safety legislation.
- To manage and maintain HR files and records HR systems and managing records in line with gbp groups GDPR and the Handling of Information Policy.

- To enable us to execute the Terms of contracts of employment (such as Remuneration, Training& Development, Internal communications etc).
- For business contingency planning and response to active incidents.

### **3.6.4 Upon termination of employment and beyond:**

- Complying with reference requests where gbp is named by the individual as a referee.
- Administering termination and post-termination matters, e.g. enforcing restrictive covenants, loan repayments, overpayments, expense reimbursements, Contract benefits, conduct termination and post-termination litigation.
- gbp will hold anonymised information relating to the period of employment for the purpose of diversity and inclusion reporting.
- We will store personal information for as long as required, (in some cases this can be up to 6 years after the end of employment) for the purposes for which it was collected, as explained in this notice. In some circumstances we may store personal information for longer periods of time, this is defined in the GDPR and Handling of Information Policy.
- **The information will be kept and maintained on a secure server only accessible to appropriate HR personnel.**

### **3.7 Data Sharing**

Data will be shared with relevant third parties to enable gbp to execute terms of employment contract such as pension, payroll and IT support.

### **3.8 Individual rights as a Data Subject**

Everyone has a number of legal rights in relation to the personal data held. Rights can be exercised by using the details at the end of this document. Please note, there may be circumstance where this has to be delayed enabling gbp to comply with the necessary legislation e.g. end of year tax declaration.

- The right to obtain information regarding the processing of personal data and access to the personal data which gbp hold.
- The right of colleagues to withdraw consent to gbp's processing of personal data at any time.
- In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible.
- The right to request that we correct personal data if it is inaccurate or incomplete.

- The right to request that personal data is deleted in certain circumstances.
- The right to request that gbp restrict our processing of personal data in certain circumstances.

### **3.9 Personal Information Promise**

gbp has formally adopted this promise which lists a number of key commitments they make to protect personal information, as a key declaration of our commitment to protecting your data

We at gbp promise that we will:

1. Value the personal information entrusted to us and make sure we respect that trust.
2. Go further than just the letter of the law when it comes to handling personal information, and adopt good practice standards.
3. Consider and address the privacy risks first when we are planning to use or hold personal information in new ways, such as when introducing new systems.
4. Be open with individuals about how we use their information and who we give it to.
5. Make it easy for individuals to access and correct their personal information.
6. Keep personal information to the minimum necessary and delete it when we no longer need it.
7. Have effective safeguards in place to make sure personal information is kept securely and does not fall into the wrong hands.
8. Provide training to colleagues who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly.
9. Put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises.
10. Regularly check that we are living up to our promises and report on how we are doing.


Signed:

*Richard Ford*

Data Protection Officer for the Information Commissioners Office

Date: September 24

In the UK, rights arise from the General Data Protection Regulations as retained, amended EU law, and the supervisory authority is the UK Information Commissioner

If you have a question or would like to make a complaint, use the details below	
<b>gbp</b>	<b>Information Commissioner's Office</b>
9th Floor, Cobalt Square, 83-85 Hagley Road, Birmingham, B16 8QG <a href="http://www.gbpartnerships.co.uk">www.gbpartnerships.co.uk</a> T: 0121 456 5662 <a href="mailto:enquiries@gbpartnerships.co.uk">enquiries@gbpartnerships.co.uk</a> Data Protection, main point of contact: Richard Ford: Data Protection Officer	Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF Helpline number: 0303 123 1113 <a href="https://ico.org.uk/">https://ico.org.uk/</a>  <small>Information Commissioner's Office</small>

## 4.0 Documentation Control

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