

Real Life Options

a real choice | a real voice | a real difference



REAL LIFE OPTIONS GROUP **PRIVACY NOTICE**

Introduction

At Real Life Options Group we understand that the privacy and security of your personal information is an important issue to you and we are committed to protecting it. We aim to be completely transparent on how we collect, process and store your personal information.

This privacy policy explains how Real Life Options Group (“we”, “us”, “our” “the Group”) collects and processes your personal information, and your related privacy rights.

Who are we?

We are Real Life Options Group. Real Life Options Group comprises of:

- **Real Life Options:** Company number 2699638. Registered Charity No: 1156258 (England and Wales) and No: SCO45939 (Scotland)
- **1st Home Care Ltd:** Company number SC272838
- **Montana Homecare Ltd:** Company number SC267110
- **Affinity Homecare Shrewsbury Ltd:** Company number 09508514

We specialise in supporting people with learning disabilities and autism and our mission is to support people to make choices and live their lives the way they want to. The Group provides specialised home care support, residential care and social work activities for the elderly and people with disabilities.

Our head administration office address is David Wandless House, A1 Business Park, Knottingley Road, Knottingley, WF11 0BU. You can contact us by post at the above address, or by telephone on +44 (0)1977 781800.

You can contact the Real Life Options Group Data Protection Officer via the details above if you have any queries on how we process your personal data or by email at dataprotection@reallifeoptions.org

How your information will be used

As an employee or volunteer of Real Life Options Group, we need to keep and process information about you for normal employment or volunteer co-ordination purposes. The information we hold and process will be used for our management and administrative use, and legal requirements only. We will keep and use it to enable us to run the Group and its constituent businesses and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment/volunteering ends and after you have left for as long as necessary.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract, we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

What personal data do we collect?

The term “personal information” in this notice refers to information that does or is capable of identifying you as an individual.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager or in some cases, external sources, such as referees. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party using a process that we have told you about.

When you start employment or volunteering with Real Life Options Group, we will ask you to provide certain personal information and may gather further information during the course of your employment or volunteering. A detailed list of the types of personal information that we process is shown below:

- name, gender, home address and telephone numbers, personal email address, date of birth;
- your application form and references,
- your contract of employment and any amendments to it or your volunteering agreement
- marital status, contact and emergency contact details;

- residency and work permit status, military status, nationality and passport information;
- information needed for payroll, benefits and expenses purposes, social security or other taxpayer identification number, banking details;
- correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary
- sick pay, pensions, insurance and other benefits information (including the gender, age, nationality and passport information for any spouse, minor children or other eligible dependants and beneficiaries);
- records relating to your career history: date of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended;
- date of volunteer starting and volunteer experience (where applicable)
- information about your health, including any medical conditions to provide appropriate support in the workplace, vaccination dates and/or compliance for industry sector required/recommended vaccinations;
- photograph for security and identification;
- records of work absences, holiday entitlement and requests, salary history and expectations, performance appraisals, supervisions, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing Real Life Options Group policies);
- where permitted by law and proportionate in view of the role or function to be carried out by an employee or prospective employee, the results of criminal background checks (DBS/PVG) and other registered bodies for both England and Scotland, health screening, health certifications,
- driving licence number, vehicle registration and driving history;
- information required to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g. child support or debt payment information);
- acknowledgements regarding Real Life Options Group policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies;
- information captured on service visitor logs, security systems, including CCTV and key card entry systems and other security and technology systems, to the extent permitted by applicable law;
- voicemails, emails, correspondence, shift patterns, real time attendance logs, location and other work products and communications created, stored or transmitted by an employee or volunteer using Real Life Options Group computer or communications equipment (although correspondence exchanged using Real Life Options Group equipment but using personal addresses is only processed to the extent permitted by applicable law);
- telephone phone call usage and mobile data usage as identified by phone billing records and mobile device management software;
- date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment or volunteering (e.g., references); and

- any other relevant data that could be necessary to comply with Real Life Options Group purposes.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we only process this information so we can comply with our contract of employment or volunteering agreement, and ensure we process your pay in line with applicable laws and rules.

There may be instances in which the personal information that you provide to us or we collect is considered Sensitive Personal Information. We define “Sensitive Personal Information” to mean personal information from which we can determine or infer an individual’s racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, genetic data, sexual life or judicial data (including information concerning the commission or alleged commission of a criminal offence).

For example: information needed for equal opportunities monitoring policy; sickness and other absence; medical records relating to you receiving, or otherwise, sector mandated and recommended vaccinations.

We only collect, store and use Sensitive Personal Information if permitted by applicable law. We will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Why do we collect this information?

We may collect, use and disclose employee or volunteer personal information to:

- evaluate applications for employment or volunteering;
- manage all aspects of an employee’s employment or manage all aspects of the volunteer relationship, including, but not limited to, payroll, benefits, process salary finance requests, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource related processes;
- develop manpower and succession plans;
- provide a range of methods of communication, for example personnel letters, payslips, company news;
- maintain sickness records and occupational health programs to comply with our health and safety and occupational health obligations;
- protect the safety and security of our employees and volunteers, property and the people we support;
- investigate and respond to claims against our employees and volunteers, property and the people we support;
- comply with our contract requirements with you or our customers;

- comply with regulatory requirements;
- conduct employee/volunteer opinion surveys and administer employee recognition programs;
- administer termination of employment or volunteering and provide and maintain references;
- maintain emergency contact and beneficiary details;
- communicate with you generally or confidentially;
- comply with our insurers requirements to protect employees and volunteers, Real Life Options Group property, or other assets;
- comply with applicable laws (e.g. health and safety), including judicial or administrative orders regarding individual employees and volunteers;
- provide access to company IT systems;
- for maintaining access to systems eg a location for password reset's to be sent to and other employee or volunteer relating notifications;
- process employee loans or salary finance applications.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job or volunteering and whether any reasonable adjustments to your job or volunteer role might be appropriate.

There are Closed Circuit Television (CCTV) cameras in operation in external areas' in some offices or other premises, which, may be used for the following purposes:

- to prevent and detect crime;
- to protect the health and safety of staff, volunteers, visitors and the people we support;
- to manage and protect Real Life Options property and the property of our staff, volunteers and the people we support and other visitors;
- for quality assurance purposes, to the extent permitted by applicable law.

We may monitor internet use, ICT systems usage and communications in accordance with applicable laws and Real Life Options ICT Security Policy.

What do we do with your information and how is it shared?

General

In order to carry out the purposes outlined above, information about you will be disclosed for the purposes set out above to human resources, finance and payroll, line managers, consultants, legal advisors and other appropriate persons in our organisation on a strictly need to know basis in line with Real Life Options Group Data Protection and Confidentiality policies.

Our Agents, Service Providers and Suppliers

Like many organisations, from time to time, we outsource the processing of certain functions and/or information to third parties.

Please note:

- When you apply for a position with us online, you may be transferred to a third party site with whom Real Life Options Group has contracted to process your personal information on our behalf.
- Once you have started employment, your personal details, employment history), salary information, payroll data, employment benefits data is stored in a system that is maintained by a third party, although transactions are processed by authorised Real Life Options Group employees. Once volunteers have started their placement, personal details and recruitment documents will be stored in a system that is maintained by a third party, although transactions are processed by authorised Real Life Options Group employees.
- Once you have started, we will send an invite to your personal email address to access our online news/intranet/social media platform, invitations to join may be sent at regular intervals. You can accept any invite on a voluntary basis, and set personal alerts that would come to your email address if requested. You can remove these notifications or access to that system at any time. This system is provided by a third party, however, it is administered by authorised Real Life Options Group employees. Usage of this platform is regulated under the Social Media Policy.
- We outsource the employment law advisory service to a third party, your employment/volunteering and personal details may be discussed with them when advice is being sought on employment matters.
- Any accidents, safeguarding concerns, incidents that occur during the course of your employment or volunteering will be stored in a system hosted and maintained by a third party, although transactions are processed by authorised Real Life Options Group employees.
- Your personal details sent by email or stored in common file storage will be stored in a system hosted and maintained by a third party, although transactions are processed by authorised Real Life Options Group employees.
- If you are enrolled onto a pension scheme the relevant personal details required to set-up, maintain and pay into the scheme will be shared with the chosen third party.
- Your name, employment number and chosen email address will be shared with the third party who maintains our employee benefit scheme you may opt out of this if you choose by contacting the Human Resources Department.
- If you choose to utilise any of the contracted employee benefit schemes such as salary finance, that is an agreement made directly with the chosen provider and we will exchange any personal data securely and act as a data processor for our chosen partner to help provide that service to our employees.
- We carry out short pulse surveys via text message with our employees and volunteers, your personal mobile phone number only will be uploaded to a third party service, no other personal data is utilised. The data from the survey is reported as numerical comparison data only and responses are therefore completely anonymous. If you choose not to reply to the initial message in any

survey you will not receive any more questions in that survey series, you also have the choice to opt out completely from participation in the surveys.

When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this privacy statement and Real Life Options Group Data Protection Policy, with appropriate technical and organisational security measures under a written contract which obliges both parties to protect your data under current data protection legislation.

Legal Requirements

We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules, regulations and any specific record retention laws.

Your data will be shared by us, as legally required, if any part of the organisation/work is to be bought, sold, moved or given back to the local authority and therefore falls under a Transfer of Undertakings and will be handled in line with the relevant legislation. You will be informed of this action, including the process and effect of opting out, prior to any data being shared.

How long do we keep your information for?

We may retain certain personal information of employees and volunteers after their employment or voluntary placement ends for any residual aspects of the purposes set out above. We will only retain such personal information for as long as it is necessary and in all cases for no longer than permitted by Real Life Options Group Records Management Policy and applicable law.

If, in the future, we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Your rights over your information

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. You can also ask for it to be erased and you can ask for us to give you a copy of the information. Further details can be found in the Real Life Options Group Data Protection Policy, a copy of which is available on request from the Data Protection Officer.

As stated above, unless you say otherwise, all personal information we request from you is obligatory and required for us to continue our contract of employment or volunteering agreement with you. If you do not provide and/or allow us to process all obligatory personal information as requested, we will not be able to keep complete information about you, thus affecting our ability to accomplish the purposes set out in this privacy notice.

Your right to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at dataprotection@reallifeoptions.org or write to the Data Protection Officer at:

David Wandless House, A1 Business Park, Knottingley Road, Knottingley, WF11 0BU
You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Updates to Privacy Notice

Details of our Privacy Notice may change from time to time. The latest versions will be available on Skills Academy and also published on our external website. You can also obtain the latest copy by writing to us at the head administration office address on page 1.