



**Nova Children's Project CIC**

**PRIVACY NOTICE**  
**for staff, workers and volunteers**

Nova Children's Project CIC is committed to protecting the privacy and security of staff's personal information. This Privacy Notice covers how we collect, use, store and disclose the data that you as employees/workers or volunteers supply to us and your rights about the data that we hold about you. For the purpose of this document, references to Nova Children's Project CIC staff includes employees, sessional 'As and When' workers and volunteers, unless otherwise specified.

### What do we collect and record?

Nova Children's Project CIC records only essential personal data. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, store, and use the following categories of personal information about you:

1. Personal contact details such as name, title, addresses, telephone numbers and personal email addresses. [PC]
2. Date of birth [DOB]
3. Gender [G]
4. Marital status and dependents [MSD]
5. Next of kin and emergency contact information [NOK]
6. National insurance number [NI]
7. Bank account details, payroll records, expenses and tax status information. [BD]
8. Salary, annual leave, pension and benefits information [SI]
9. Start data [SD]
10. Location of employment or workplace [LOE]
11. Recruitment information (including copies of references) [RI]
12. Employment records (including job titles and work history) [ER]
13. Performance information [PI]
14. Disciplinary and grievance information [DG]
15. Photographs [P]

We may also collect, store and use 'special categories' of more sensitive data which requires a higher level of protection:

16. Information about your health, including any medical condition, health and sickness records [HR]
17. Absence notes [AN]
18. Information about criminal convictions and offences [CC]

### How do we collect and record?

There are two main ways in which we collect data: directly or indirectly.

- Direct interactions: whenever we communicate with you either face-to-face, over the telephone, through paperwork (such as the application form that is part of the recruitment process) or via email.
- Indirect interaction: we may collect information from third parties. This includes collecting references from previous and current employers, and/or tutors and teachers as part of the recruitment process. We collect information from the background check provider the Disclosure & Barring Service (DBS).

### Why do we collect personal information?

Nova Children's Project CIC takes our responsibility around handling your personal data seriously. 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 our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (\*\*\*)

More specifically, we process your personal information as follows (the asterisks show the purpose for processing):

Purpose	Type of data	Lawful basis
Making a decision about your recruitment or appointment	PC, RI, CC	***
Checking you are legally entitled to work in the UK	PC, DOB, NI, RI	**
Paying you, deducting tax and National Insurance contributions	PC, DOB, NI, BD, SI, AN	***
Liaising with your pension provider	PC, DOB, NI, SI, SD	**
Dealing with legal disputes involving you, or other employees, including accidents at work	PC, DOB, MSD, LOE, RI, ER, PI, DG, HR, AN, CC	***
Ascertaining your fitness to work	PC, DOB, ER, HR, AN, DI	***
Gathering evidence for possible grievance or disciplinary hearings	PC, DOB, G, MSD, PI, DG, ICS, HR, AN, DI	***
Education, training and development requirements	PC, RI, ER, PI, DG	*
Administering the contract we have entered into with you	PC, NOK, BD, SI, SD, LOE, PI, DG, HR, AN	*
Managing sickness absence	ER, HR, AN	* **

### Changes of purpose

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required by law.

### Who can see records?

The Project Manager, Deputy Project Manager and Company Directors are the main people to process data and thus can see all the information collected about you. Files are adapted so that other members of staff

can only see data that is necessary to carry out their roles, e.g., coordinators accessing training records to know who is trained in delivering emergency medication.

### Information sharing

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### Which third party service providers process my personal information?

The following activities are carried out by third party service providers

- Payroll service: BrightPay
- Tax deductions and National Insurance Contributions: HMRC
- Pension administration: NEST
- Enhanced DBS checks: Disclosure and Barring Service
- Right to Work checks: Home Office
- Fitness to Work Assessment: Occupational Health
- Future employers – references – at your request
- Track and Trace in response to Covid 19 pandemic

### How secure is my information with third party service providers?

All our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### What about other third parties?

We may share your personal information with other third parties (e.g., Kent County Council, Local Authority Designated Officer, Police) for example in the context of a safeguarding concerns or child protection allegations and in line with our Child Protection and Safeguarding policy. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### How we store records

We have put in place appropriate security measure to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes the following measures:

- Staff files are mainly kept electronically. The electronic files are processed and stored on Nova Children's Project CIC's web-based, collaborative platform which is password protected. Electronic files may include word documents, photos or videos.
- Some information, such as contact details are kept in a paper format, which are stored in the Sunrise Children's Centre, which has a fob system to gain access to. Additionally, the details are kept in a lockable container and do not leave the premises.
- The Project Manager has a smartphone which will have your mobile number but requires either a number code or touch ID to open and is kept on the manager's person at all times whilst at projects. Otherwise it is stored securely within the home setting, secured in a location that other household members cannot access it.

### Access to records (Subject Access Requests)

You may request a copy of the information that Nova Children's Project CIC holds about you, by writing to the Project Manager. They will arrange for you to access this as soon as possible (it must take place within forty days of the request). They will be present whilst you are viewing your records, in order to ensure that any questions can be answered and any changes made that are requested. This enables you to have any incomplete or inaccurate information we hold about you corrected.

On occasion, it may be that Nova Children's Project CIC keeps some of your personal data in confidence. This may be because it could have a serious negative impact or cause significant harm. Additionally, references to other people within the data will be withheld in order to protect their personal data.

### Closing staff files

When your work with Nova Children's Project CIC comes to an end, we are required to keep your data for a minimum of six years. In some circumstances, Nova Children's Project CIC may be required to keep records for a longer period of time, such as if an individual was involved in a Child Protection case or had an allegation made against them. However, data will be kept for no longer than necessary.

Once files have reached their retention date, the records will be deleted and destroyed as appropriate.

If Nova Children's Project CIC delivers a service on behalf of another organisation, then the responsibility for the files lies with that organisation when the contract comes to a close.

### Data breaches

A data breach is considered by the Nova Children's Project CIC to be "a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed under GDPR." <https://ico.org.uk/for-organisations/guide-to-pecr/communications-networks-and-services/security-breaches/>

If a data breach occurs, Nova Children's Project CIC will take the following actions:

- The ICO will be informed within 72 hours of the project becoming aware of the breach unless it is unlikely to result in a risk to the rights and freedoms of the subject. This will include the Project Manager completing a Breach Notification Form, which can be found on the ICO website <https://ico.org.uk/for-organisations/guide-to-pecr/communications-networks-and-services/security-breaches/>;
- The subject will be informed as soon as possible if the personal data breach is likely to result in a high risk to their rights and freedoms;
- If required by a contract, the commissioner will be informed as soon as possible;
- A record of the breach will be kept, including those incidences that do not necessarily need to be reported to the ICO. This record will include details of the facts, its effects and the remedial action taken;
- For all data breaches the Project manager will assess whether the data breach needs to be investigated further, as to identify whether the event was down to human or systemic error and what processes need to be improved to ensure that further breaches are prevented.

### Making a complaint

If you have any questions about this privacy notice or how we handle your personal information, please contact the Project Manager.

If you are not satisfied by our response you also have the right to make a complaint at any time to the Information Commissioner's Office (details of the process can be found online at <https://ico.org.uk/for-the-public/raising-concerns/>).

### Working together with Nova Children's Project CIC to protect data

It is the responsibility of all staff to ensure that we keep data secure. As part of your role, you will have access to the sensitive data of our service users, e.g., care plans. It is your responsibility, along with the senior staff, to ensure that this data is kept secure, such as returning care documents to the travelling packs once they

have been read. As part of your induction, you will be required to attend training, which includes modules on confidentiality and information handling; it is your responsibility to make sure you attend these training sessions. Additionally, senior staff will regularly update you to changes in policy or legislation regarding data protection and you will be required to familiarise yourselves with the information provided.

It is important that the personal information we hold about you is accurate and current, so please let us know if your information changes.

#### **Data Protection Officer**

The Data Protection Officer (DPO) for Nova Children's Project CIC is the Project Manager: Natalie Lower who can be contacted on either [natalie@novachildrensproject.co.uk](mailto:natalie@novachildrensproject.co.uk) or 07757 719 893.