



EMPLOYEE AND JOB APPLICANT PRIVACY POLICY

Bradford City Football Club, Valley Parade, Bradford, BD8 7DY

Data controller: **Bradford City Football Club, Valley Parade, Bradford, BD8 7DY.**

Data protection officer: **Paula Watson - paulawatson@bradfordcityafc.com**

We collect and process personal data relating to our employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data whilst meeting our data protection obligations.

What information do we collect?

We collect and process a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number, date of birth and gender.
- The terms and conditions of your employment.
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us.
- Information about your remuneration, including entitlement to benefits such as pensions and any insurance cover.
- Details of your bank account and national insurance number.
- Information about your next of kin, dependants and emergency contacts.
- Information about your nationality and entitlement to work in the UK.
- Information about your criminal record.
- Details of your schedule (days of work and working hours) and attendance at work.
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave.
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- Performance assessments, including appraisals, reviews and ratings, training you have participated in, performance improvement plans and related correspondence.
- Information about medical or health conditions, including whether you have a disability for which we need to make reasonable adjustments.
- Details of trade union membership.
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways.

For example, data is collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or at any time during employment; from general correspondence with you; or through interviews, meetings or other assessments.

In some cases, we collect personal data about you from third parties. Information is sought from third parties with your consent only, unless law permits otherwise and we believe there to be a business need.

Data is stored in a range of different places, including in your personnel file, in our HR management systems and in other IT systems including our email system.

Why do we process personal data?

We need to process 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 any benefit, pension and insurance entitlements. 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 an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws, to enable employees to take periods of leave to which they are entitled, and to consult with you if redundancies are proposed or a business transfer is to take place.

For certain positions, it is also necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question. It may also be necessary to process criminal records data in the context of disciplinary or grievance proceedings, for example to investigate and take appropriate action if you are suspected of committing an offence whether at or outside work.

In other cases, we have a legitimate interest in processing personal data before, during and after the employment relationship ends. Processing employee data allows us to:

- 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.
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- Ensure employees are complying with relevant policies and procedures.
- Operate and keep a record of employee performance and related processes, to plan for career development, succession planning and workforce management.
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and to ensure that employees are receiving the pay or other benefits to which they are entitled.
- Obtain occupational health advice so that we comply with our duties in relation to individuals with disabilities, to meet obligations under health and safety law, and to ensure employees are receiving the pay or other benefits to which they are entitled.
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental leave, shared parental leave, and parental bereavement leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled.
- Ensure effective general HR and business administration.
- Conduct employee engagement surveys.

- Provide references on request for current or former employees.
- Respond to and defend against legal claims and enforce our legal rights; and
- maintain and promote equality in the workplace.

Where we rely on legitimate interests as a reason for processing data, we have considered whether those interests are overridden by the rights and freedoms of employees or workers and have concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, or racial or ethnic origin, is processed to carry out employment law obligations such as those in relation to employees with disabilities, for health and safety purposes and to ensure that employees have the right to work in the UK.

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purpose of equal opportunities monitoring.

Data that we use for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time by contacting the Data Protection Officer.

Employees are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

As noted above, we may process criminal records data to assess your suitability for employment both when you are recruited and in the course of your employment.

Who has access to data?

- Your information will be shared internally with your Line Manager and other managers in your area of work.
- We may share your data with one of more third parties to obtain pre-employment references from other employers, obtain employment background checks from third-party providers, obtain necessary criminal records checks from the Disclosure and Barring Service, or report suspected offences to the appropriate authorities.
- We may also share your data with third parties for the purposes of enforcing our legal rights and may share your data with third parties in the context of a sale of some or all of our business. In these circumstances data will be subject to confidentiality arrangements.
- We may also share your data with third parties that provide services or process data on our behalf, in connection with HR support, payroll, the provision of benefits and the provision of occupational health services.
- We will not transfer your data to countries outside the UK.

How do we protect data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, that they are under a duty of confidentiality and that they are obliged to implement appropriate technical and organisational measures to ensure the security of data.

How long do we keep data?

We will hold your personal data for the duration of your employment.

The periods for which your data is held after the end of employment are available by contacting the Data Protection Officer.

Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request.
- Require us to change incorrect or incomplete data.
- Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- Object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing.
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Protection Officer named at the start of this policy using the details provided.

You can make a subject access request by completing a subject access request form.

If you believe that we have not complied with your data protection rights, you can complain to the [Information Commissioner](#).

What if you do not provide personal data?

You have some obligations under your employment contract to provide us with 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 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.

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.

Automated decision-making

Employment decisions are not based solely on automated decision-making.