

# Cricket Wales Limited

## Staff Privacy Policy

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### Policy And Procedure

**Author** CEO

**Approved by** Board of Directors

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**Review date**



# Cricket Wales Limited

## Staff Privacy Policy

This Privacy Policy applies to all employees, volunteers, workers, secondees/work experience/placement students/consultants.

Your privacy is extremely important to us so we want you to know exactly what kind of information we obtain about you and how we use it.

We've set out all the details below.

Please take the time to read and understand this policy.

### 1 What information do we hold about you?

As an employee, a volunteer, worker or a secondee/work experience/placement student/consultant at Cricket Wales Limited we will ask you to provide certain personal information relating to you at the outset of you commencing work for us and during the course of your employment/engagement.

This information will include:

- your name, address and contact details
- your date of birth
- your gender
- your family details
- your education and qualifications
- your skills, experience and membership of professional bodies
- your membership of cricket related organisations
- your National Insurance number and tax code
- your emergency contact details
- your bank details
- your pension details
- evidence of ability to work in the UK
- driving licence

We will also collect additional information during the course of your employment/engagement with us, such as:

- information provided from your previous employer(s) and other referees
- your employment history
- your working terms and conditions (e.g. pay, hours of work, holidays, benefits)
- details of any other offices or appointments or business interests you hold
- any accidents connected with work
- any training undertaken
- any disciplinary, grievance or other issues relating to your employment
- your attendance record and leave taken (e.g. holiday, sickness absence, family leave)
- performance reviews
- any other personal information you share with us, including lifestyle and social circumstances
- any reasonable adjustment(s) made to your role or your work under the Equality Act 2010

We also keep certain special category personal data in relation to you which might be relevant to your employment, such as your:

- racial or ethnic origins
- religious or philosophical beliefs
- long term illness or mental health
- sexual orientation
- details of any known disability
- commission or alleged commission of any offence

## 2 What will we use your information for and what are our legal bases for doing so?

We use the personal information we hold about you for a number of different purposes, which we list below. Under data protection law we need to have a valid legal basis for using your personal information, we also set out below the legal bases which we will be relying upon.

We use the personal information we hold about you for the following reasons:

- to comply with and enforce our contract with you and inform you of any changes
- to pay you and provide you with any benefits you are entitled to
- to deal with any disciplinary and grievance issues which may arise relating to you or in respect of which you may be able to provide relevant information
- to record your absences from work and your leave
- to review and manage your performance and development
- for general employment or contract administration purposes

In each of these cases the legal basis that we will be relying upon to process your personal information will be because it is necessary for the performance of the contract between us.

We will also use the personal information we hold about you for the following reasons:

- to comply with and demonstrate compliance with our legal obligations and best practice as an employer
- to comply with and demonstrate compliance with any regulatory requirements

In both of these cases the legal basis that we will be relying upon to process your personal information will be because it is necessary for us to do so to comply with our legal obligations.

We will also use the personal information we hold about you for the following reasons:

- to monitor compliance with any of our policies and procedures
- to provide references

In this case the legal basis that we will be relying upon to process your personal information will be because it is in our legitimate interests. Our specific legitimate interests are:

- to be a fair and reasonable employer in relation to your employment/engagement and our employment/engagement of others and be able to demonstrate this and/or

- to comply with and demonstrate compliance with our obligations as an employer and/or our policies and procedures relating to employees, volunteers, workers, secondees, work experience/placement students and consultants
- to enable us to respond to reference requests.

We use the special category personal data we hold about you for a number of different purposes, which we list below. Data protection law prohibits us from processing any special category personal data unless we can satisfy at least one of the conditions laid down by data protection law. We also set out below the specific conditions we rely upon when processing special category data.

We use the special category personal data we hold about you for the following purposes:

- to monitor equality and diversity.

In this case the condition we rely upon for processing the information is to monitor equality and diversity which is necessary for reasons of substantial public interest, namely for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained

- to comply with and demonstrate compliance with employment law and best practice and any other applicable laws
- to comply and demonstrate compliance with any regulatory requirements
- to deal with any disciplinary and grievance issues which may arise relating to you or in respect of which you may be able to provide relevant information

In these cases the condition we rely upon for processing the information is because it is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment law and/or the processing is necessary for the establishment, exercise or defence of legal claims and/or the processing is necessary for the assessment of your working capacity or medical diagnosis

- to record your absences from work
- to provide you with any health benefits you may be entitled to

In these cases the condition we rely upon for processing the information is because the processing is necessary for the establishment, exercise or defence of legal claims and/or the processing is necessary for the assessment of your working capacity or medical diagnosis.

We will not otherwise process your sensitive or special category information unless you have given us explicit consent to do so.

We do not carry out any automated decision-making or profiling in relation to you.

Some of the personal data we request will be because we have a legal or contractual requirement to obtain and use the information or it is necessary for us to obtain the information to be able to enter into a contract with you. An example of this would be under the Immigration, Asylum and Nationality Act 2006 we are required to satisfy ourselves that you have the right to work in the UK. Failure to provide such information will prevent us from employing or engaging you.

### 3 Who do we share your information with?

Your personal data will be held by the Administration Department. Your personal data will be shared internally with other individuals and/or departments where this is reasonably necessary for the processing purposes set out in section 2 above.

From time to time we will need to share your information with external people and organisations such as our Payroll and Pension Service providers. We will only do so where we have a legitimate or legal basis for doing so and in compliance with our obligations under data protection laws.

Your information may be disclosed to:

- **Her Majesty's Revenue and Customs (HMRC)** in connection with your pay and benefits
- **Banks and other financial institutions (Nat West Bank)** in connection with your pay and benefits.
- **Pensions providers (Scottish Widows)** for providing and administering your pension.
- **Payroll provider (HSJ Accountants)** to enable us to pay you.
- **Other people who help us** provide our website, in-house WIFI network, they include information technology experts who design and host our website (**Paradisii Ltd**)
- **Our insurers and insurance brokers (Allianz)** who provide us with comprehensive cover against the risks of running a business
- **Employment and recruitment agencies and outplacement organisations**
- **Professional bodies and regulators** such as (**ECBCA & ECBCO**)
- **Our professional advisors** including our accountants when they need it to give us their professional advice (**Broomfield Alexander, HSJ Accountants**)
- **Occupational Health and other medical professionals including social and welfare organisations** to provide us with medical opinions in relation to any medical condition, illness or disability you may have or develop during the course of your employment/engagement
- **The Police, local authorities, the courts** and any other government authority if they ask us to do so (but only if us doing so is lawful).
- **Other people who make a subject access request**, where we are allowed to do so by law.
- **Complainants**, where this is necessary to respond to any complaints received
- **Where we are legally obliged to do so**, e.g. to comply with a court order
- **Prospective employers** in response to reference requests
- **Educational establishments, examination bodies, course providers** in relation to any training you undertake or have undertaken
- **Marketing service providers** who carry out marketing activities on our behalf e.g. mailchimp and survey monkey
- **Other Sports Governing Bodies: (EWCB)**

### 4 International Transfer of Your Information

We do not transfer any of your personal data outside the European Economic Area.

### 5 How Long Do We Keep Your Information For?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place.

In most cases, this means we will keep your information for as long as you are employed or engaged by us and for a period of 7 years thereafter. The reason for keeping your personal data for this length of time is to comply with HMRC requirements and because of the fact that some claims can be brought up to 6 years after your employment/engagement ends.

Please refer to our retention policy: [www.cricketwales.org.uk](http://www.cricketwales.org.uk)

## 6 Individual rights

Data protection legislation provides individuals with a number of different rights in relation to their data. For example, you have the right to ask us whether we hold information about you and if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a “subject access request”. Certain exemptions and conditions apply to this right.

There are other rights which you also may be able to exercise, such as the right to have inaccurate personal data rectified, to object to the processing of personal data, to object to direct marketing, to the erasure of personal data or to have the processing of your personal data restricted as well as the right to have electronic data made portable. All these rights are subject to certain conditions and exemptions.

If you wish to exercise any of these rights or obtain further information about these rights please contact Gavin Chilton ([gavin.chilton@cricketwales.org.uk](mailto:gavin.chilton@cricketwales.org.uk) )

## 7 Ability to withdraw consent

Where your personal data is processed on the basis of your consent or explicit consent, you have the right to withdraw your consent to the processing at any time. You can do this by emailing [gavin.chilton@cricketwales.org.uk](mailto:gavin.chilton@cricketwales.org.uk) . Any withdrawal of consent will not affect the lawfulness of any processing of your personal data based on consent before the withdrawal is notified.

## 8 Accuracy

If any of your personal details change during your employment/engagement you should contact Kerry Lloyd ([kerry.lloyd@cricketwales.org.uk](mailto:kerry.lloyd@cricketwales.org.uk) ) to notify them and provide them with the updated accurate information.

## 9 Updates to this privacy policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

We will keep this policy under regular review to ensure it is accurate and kept up to date. This policy was last updated on 21<sup>st</sup> February 2019.

## 10 About Us

Our full name is Cricket Wales Limited.

We are the data controller of the information you provide us with. The term “data controller” is a legal phrase used to describe the person or entity that controls the way information is used and processed.

## 11 Where to Go if You Want More Information About Your Privacy Rights

The Information Commissioner’s Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here [http://www.ico.gov.uk/for\\_the\\_public.aspx](http://www.ico.gov.uk/for_the_public.aspx).

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

## 12 Contact us

You’re welcome to get in touch with us to discuss your information at any time.

Our contact details are here [info@cricketwales.org.uk](mailto:info@cricketwales.org.uk) , Tel: 02920 419341.