



Employee Privacy Notice

Data controller: SIPS Education Limited

SIPS Education Limited has a legitimate reason to collect and process personal data relating to its employees so that it can effectively administer and manage the employment relationship. SIPS Education Limited is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does SIPS Education Limited collect and hold?

SIPS Education Limited collects and processes a range of information about its employees. This includes the following information:

- Name, address and contact details, including email address and telephone number, date of birth and gender;
- Terms and conditions of employment;
- Details of qualifications, skills, experience and employment history, including start and end dates, with previous employers and with SIPS Education Limited;
- Information about remuneration, including entitlement to benefits such as pensions;
- Bank account and national insurance number details;
- Information about marital status and emergency contacts;
- Information about nationality and entitlement to work in the UK;
- Information about criminal records (if applicable);
- Details of working patterns and attendance at work, including employee requests for flexible working;
- Details of all periods of leave taken, including (but not limited to) holiday, sickness absence, unpaid leave and extended leave, maternity/paternity/adoption/shared parental leave, dependent leave, compassionate leave, and the reasons for the leave;



- Details of any formal disciplinary or grievance procedures in which employees have been involved, including any warnings issued and related correspondence;
- Assessments of employee performance, including appraisals, performance reviews and ratings, probation reviews; performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not employees have a disability for which SIPS Education Limited needs to make reasonable adjustments;
- Information relating to employees' health and safety at work;
- Equal opportunities monitoring information including information about employees' ethnic origin, sexual orientation, and religion or belief.

SIPS Education Limited may collect this information in a variety of ways. For example, data might be collected through application forms, obtained from passports or other identity documents such as driving licences; from forms completed by employees at the start of or during employment; from correspondence with employees; or through interviews, meetings or other assessments.

In some cases, SIPS Education Limited may collect personal data about its employees from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law. In most cases, SIPS Education Limited will only seek information from third parties with the prior consent of the employee(s) in question.

Why does SIPS Education Limited process personal data?

SIPS Education Limited needs to process personal data to enter into an employment contract with its employees and to meet its obligations under employee employment contracts. For example, SIPS Education Limited



needs to process employee personal data to provide an employment contract, to pay an employee in accordance with their employment contract and to administer entitlements such as pension benefits.

In some cases, SIPS Education Limited needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

SIPS Education Limited also has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows SIPS Education Limited to:

- Run recruitment and promotion processes;
- 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;
- Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Obtain occupational health advice, to ensure that SIPS Education Limited complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensures that 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 and shared parental leave), to allow effective workforce management, to ensure that SIPS Education Limited complies 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;
- Provide references on request for current or former employees; and
- Respond to and defend against legal claims.
- Fulfil any statutory reporting obligations.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities). Where SIPS Education Limited processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is for the purposes of equal opportunities monitoring. Data that SIPS Education Limited uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of deciding against this.

SIPS Education Ltd process this information under Article 6 and 9 of the General Data Protection Regulations as follows:

Article 6 on the basis of:

- Consent: where you have given SIPS Education clear consent to process your personal data for a specific purpose
- Contract: the processing is necessary for a contract you have with SIPS Education Ltd
- Legal obligation: the processing is necessary for SIPS Education Ltd to comply with the law
- Vital interests: the processing is necessary to protect someone's life.



Article 9 in the case of sensitive data on the basis of:

- Where you have given your explicit consent to the processing of personal data for one or more specified purposes
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
- processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee.

Who has access to data?

Employee information may be shared internally, including with members of the HR team, , Health & Safety, employee line managers, managers in the business area in which employees work, SIPS Education Limited Management and specific IT staff but only if access to the data is necessary for performance of their roles.

SIPS Education Limited shares employee data with third parties in order to run the payroll obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service.

SIPS Education Limited will also share your data if necessary with third parties that process data on its behalf, for example, in connection with any statutory reporting obligations, and for the provision of benefits and the provision of occupational health services.

Apart from the above examples, we only share your personal data if we believe someone's life is in danger or we believe we are compelled to by law. The secure database we use to store your data is kept in the UK and



this data is not transferred to or stored at a destination outside the European Economic Area.

How does SIPS Education Limited protect your data?

SIPS Education Limited takes the security of your data seriously. SIPS Education Limited has 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. Policies include Information Security Policy, Data Protection Policy, and email procedures regarding data protection. Where SIPS Education Limited engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical measures to ensure the security of data.

For how long does SIPS Education Limited keep data?

SIPS Education Limited will hold employees personal data for the duration of their employment. The period for which detailed employee data is held after the end of employment is six years, and limited employment data is retained indefinitely for historical purposes.

As part of the recruitment process, data will be held for a period of 6 months for unsuccessful candidates.

What happens if an employee does not provide personal data?

Employees have some obligations under their employment contract to provide SIPS Education Limited with data. In particular, they 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. They may also have to provide SIPS Education Limited with data in order to exercise their statutory rights, such as in relation to statutory leave



entitlements. Failing to provide the data may mean that employees are unable to exercise their statutory rights.

Certain information, such as contact details, proof of identification, right to work in the UK and payment details, have to be provided to enable SIPS Education Limited to enter a contract of employment with an individual employee. If employees do not provide other information, this will hinder SIPS Education Limited's ability to administer the rights and obligations arising because of the employment relationship.

Automated decision-making

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

Employee rights

As a data subject, individual employees have a number of rights. They can:
Access and obtain a copy of their data on request;

- Require SIPS Education Limited to change incorrect or incomplete data;
- Require SIPS Education Limited to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of their data where SIPS Education Limited is relying on its legitimate interests as the legal ground for processing;
- Request SIPS Education Limited provide a portable copy of the personal data they have provided about themselves for the performance of contract.



If you would like to exercise any of these rights, please contact SIPS Education Limited Data Protection Officer using the following contact details:

By email: laura.hadley@sipseducation.co.uk

By telephone: 0121 296 3000

By post: Data Protection Officer
c/o SIPS Education Limited

2nd Floor

Guardian House

Cronehills Linkway

West Bromwich

West Midlands

B70 8GS

If you have a concern about the way we are collecting and using your data we would ask you to contact our Data Protection Officer in the first instance. However, you do also have the right to complain directly to the Information Commissioner at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Information about the Information Commissioner is available at:

<https://ico.org.uk/>

Changes to this privacy notice

This privacy notice may be updated from time to time so you may wish to check it each time you submit personal information to SIPS Education Limited. We encourage you to check this privacy notice from time to time to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example,



how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).