

# Privacy Policy (Staff & Volunteers)

Policy Name	Privacy Policy (Staff & Volunteers)
Executive Owner	Chief Financial Officer
Approval body	ELT
Frequency of approval	3 years
Date approved	January 2024
Date next approved	January 2027

## Policy Statement

At Fight for Sight, we have to collect, use, and share your personal data. This policy explains how we do this, and your rights in relation to the personal data we hold.

## Scope

In this policy, “Fight for Sight,” “Vision Foundation,” “we” or “our” means:

- i. British Eye Research Foundation, trading as Fight for Sight, a company limited by guarantee registered in England (Company Number 05525503) and a charity registered in England by the Charity Commission for England and Wales (Charity Number 1111438) whose registered office is located at 18 Mansell Street, London, E1 8AA.
- ii. Vision Foundation for London, trading as Vision Foundation, a company limited by guarantee registered in England (Company Number 03693002) and a charity registered in England by the Charity Commission for England and Wales (Charity Number 1074958) whose registered office is at 11-12 Whitehorse Mews, 37 Westminster Bridge Road, London, SE1 7QD.

- iii. The Iris Fund for the Prevention of Blindness, a company limited by guarantee registered in England (Company Number 1929733) and a charity registered in England by the Charity Commission for England and Wales (Charity Number 293204) whose registered office is located at 18 Mansell Street, London, E1 8AA.
- iv. Eye Research UK, a company limited by guarantee registered in England (Company Number 4424695) and a charity registered in England by the Charity Commission for England and Wales (Charity Number 1091829) whose registered office is located at 18 Mansell Street, London, E1 8AA.
- v. Fight for Sight Trading Limited (Company Number 2389071) whose registered office is located at 18 Mansell Street, London, E1 8AA.

We are a Data Controller, registered with the Information Commissioner's Office (Registration Number Z9323113).

## **How we collect your information**

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when expressing interest in applying to work for us, or becoming a volunteer or trustee
- when you submit your formal application to work for us, or accept an offer to become a volunteer or trustee, and provide your personal data in whatever form
- from third parties, for example your previous or current employers and institutions of study, recruitment consultants and similar, in order to verify details about you in relation to your application
- during the course of your employment or other engagement with us, for example when you provide your contact details to us, when you or someone else completes paperwork regarding your performance appraisals, and in the course of fulfilling your employment or other duties more generally.
- in various other ways as you interact with us during your time as a member of staff or as a volunteer or trustee and afterwards, where relevant, for the various purposes set out below.

## Types of information we collect

We may collect the following types of personal data about you, and your “next of kin” where necessary for your employment or other engagement to work for us, or to serve as a volunteer or trustee. This includes:

- your contact details, including but not limited to postal address, email address, telephone numbers
- contact details of your nominated “next of kin,” and other relevant individuals, such as your PA
- records of communications and interactions we have had with you
- your name, title, date of birth, and your right to work in the UK
- details of your education, and references from educational establishments
- details of your employment history, and references from previous employers
- details of professional memberships
- your bank details
- your tax status and tax code
- any other information relevant to your employment, or engagement with us

We may also collect sensitive personal data, including:

- information concerning your health and medical conditions
- information about certain criminal convictions and offences, but only where required by our recruitment policy
- biometric data, which may include, but is not limited to, facial recognition, fingerprints, or voice recognition data. Such data will be used solely for the purpose of verifying identities, enhancing security, and preventing unauthorised access to our facilities and sensitive information

In each case, this will only be where necessary for your employment or other engagement to work for us, or to serve as a volunteer or trustee.

## How we use your information

The purposes for which we may use the personal data (including sensitive personal data) we collect in connection with your employment or other engagement with us include:

### *Before we employ or engage you in any capacity:*

- providing you with information about us
- administering job applications, and making job or role offers
- carrying out due diligence checks on you in relation to your education and employment history

### *Once you are employed or engaged by us in any capacity:*

- for the performance of the contract between us
- providing you with the information and invitations necessary for you to carry out your duties as an employee, volunteer, or trustee
- to pay you and administer benefits in connection with your employment or engagement with us
- for tax purposes, and to provide any information requested by HMRC in connection with your employment or engagement with us
- contacting you or your “next of kin” or PA or other nominated colleague for business continuity purposes, e.g. to confirm your absence from work
- for disciplinary purposes, where required
- for other administrative purposes in your best interest and for our continuous improvement as an employer
- making travel arrangements where required
- for other administrative purposes related to your employment, for example to update you on changes to your terms and conditions of employment
- preventing and detecting crime, and to investigate complaints and grievances
- internal record keeping, including the management of any staff feedback or complaints
- for internal and external audit purposes

*After you have left employment:*

- for providing basic information to a future employer, such as your previous tax and payment records, your employment dates, and your job title

*We may process your sensitive personal data in particular for the purposes of:*

- monitoring your physical or mental health or condition(s) in order to monitor and record sick leave and take decisions on your fitness for work

## **The basis for processing your information and how we use it**

We may process your personal data for the above purposes because:

- it is necessary for the performance of a contract with you, or in order to take steps at your request to enter into such a contract
- it is necessary for our or a third party's legitimate interest. Our legitimate interests include our charitable objectives.
- it is necessary to protect your or another person's vital interests (for example a life-threatening situation where we must process your personal data in order to ensure you receive appropriate medical attention)
- it is necessary for the establishment, exercise, or defence of legal claims (for example, to protect and defend our rights or property)
- we have your specific or, where necessary, explicit, consent to do so (for example where you provide details of your racial, or ethnic origin, or religious beliefs so that we can monitor our compliance with equal opportunities legislation)
- it is necessary for our compliance with legal obligations, for example with Charity Commission or HMRC investigations, or criminal investigations, or otherwise for the prevention and detection of crime.

## **Sharing your information with others**

For the purposes referred to in this policy and relying on the bases for processing set out above, we may share your data with certain third parties. We may disclose limited personal data to a variety of recipients including:

other employees, agents, or contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process personal data on our behalf as part of administering payroll services, or the provision of employment benefits, such as pensions.

internal and external auditors

the Charity Commission, HMRC, and other relevant bodies where we are legally required to do so

We may also share information about you with other employers in the form of regulatory reference, where we are required to do so in compliance with our legal obligations or relevant regulatory rules.

## **International data transfers**

As a matter of course, we do not transfer your personal data outside of the European Economic Area unless we are required by law.

## **How long your information is kept**

Personal data relating to unsuccessful job applicants is deleted within 6 months of the end of the application process.

For employees and volunteers, subject to other notices that we may provide to you, we may retain your personal data for a period of six years after your contract of employment (or equivalent agreement) had expired or been terminated.

For trustees, subject to any other notices that we may provide to you, we may retain certain personal data in perpetuity for archival and historical

record (this will exclude private data such as copy passports).

## Your rights

Under GDPR, you have the following rights in relation to our processing of your personal data. These rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply.

- to obtain access to, and copies of the personal data we hold about you
- to require us to correct the personal data we hold about you if it is incorrect
- to require us to erase your personal data in certain circumstances
- to require us to restrict our data processing activities in certain circumstances
- to object, on the grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format, specified by you, including for the purpose of you transmitting that personal data to another data controller, and
- where our processing is based on your consent, you may withdraw that consent without affecting the lawfulness of our processing based on consent before its withdrawal.

If you are not satisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner. You can also find out more about your rights under the data protection legislation from the Information Commissioner's Office website, at [www.ico.org.uk](http://www.ico.org.uk)