

## Staff Privacy Notice

<b>Document name</b>	Staff Privacy Notice
<b>Version number</b>	V3.2
<b>Status</b>	Published
<b>Department or Team</b>	Information Management and Compliance Service (IMC)
<b>Relevant policies</b>	N/A
<b>Distribution</b>	Internal
<b>Author or Owner</b>	Steven Johnston, Team Manager, IMC
<b>Approved by</b>	Head of Knowledge and Internal Communications
<b>Date of sign off</b>	31/04/2019
<b>Review by</b>	31/01/2025
<b>Security classification</b>	Official

### Key messages

The main objective of this policy is to provide:

- All ICO employees, ex-employees, agency staff, contractors, secondees and non-executive directors with information about what they can expect when the ICO processes their personal information.

## Does this policy relate to me?

The privacy notice applies to all staff.

## Table of contents

1. Introduction .....	4
2. How do we get your information .....	4
3. What personal data do we process and why.....	5
3.1. Information related to your employment.....	5
3.2. Information related to your salary, pensions and loans .....	6
3.3. Information related to your performance and training.....	7
3.4. Information relating to monitoring .....	8
3.5. Information relating to your health and wellbeing and other special category data .....	8
4. Lawful basis for processing your personal data.....	9
5. How long we keep your personal data.....	11
6. Data Sharing .....	11
7. Do we use any data processors? .....	12
8. Your rights in relation to this processing.....	12
9. Overseas transfers .....	13
10. Further Information .....	13
10.1. Personnel files .....	13
10.2. Car park scheme.....	13
10.3. Staff surveys .....	14

10.4. Whistleblowers.....	15
10.5. Equal opportunities monitoring .....	15
10.6. Equality and diversity networks.....	16
10.7. Workforce Development and Planning .....	17
10.8. Resources to help with your work.....	18
10.9. Occupational health .....	19
10.10 Trade Union Membership .....	20
10.11. Monitoring of staff .....	20
10.12. Staff involved in criminal enforcement .....	20
10.13. Financial monitoring .....	21
10.14. Security clearance .....	21
10.15. Security passes .....	22
10.16. CCTV .....	22
10.17. Disclosures in response to information requests .....	23
10.18. Requests for references.....	23
10.19. Car Sharing .....	24
10.20. Online Events .....	24
Feedback on this document.....	25
Version history .....	25
Annexes .....	32
Data Processors .....	32

## 1. Introduction

- 1.1. As an employer the Information Commissioners Office (ICO) must meet its contractual, statutory and administrative obligations. We are committed to ensuring that the personal data of our employees is handled in accordance with the principles set out in the Commissioner's [Guide to Data Protection](#).
- 1.2. This privacy notice tells you what to expect when the ICO collects personal information about you. It applies to all employees, ex-employees, agency staff, contractors, secondees and non-executive directors. However the information we will process about you will vary depending on your specific role and personal circumstances.
- 1.3. The ICO is the controller for this information unless this notice specifically states otherwise. [Details of our Data Protection Officer can be found here](#).
- 1.4. This notice should be read in conjunction with our [global privacy notice](#) and our other corporate [policies and procedures](#). When appropriate we will provide a 'just in time' notice to cover any additional processing activities not mentioned in this document.

[Back to Top](#)

## 2. How do we get your information

- 2.1. We get information about you from the following sources:
  - Directly from you.
  - From an employment agency.
  - From your employer if you are a secondee.
  - From referees, either external or internal.
  - From security clearance providers.

- From Occupational Health and other health service providers.
- From Pension administrators and other government departments, for example tax details from HMRC.
- From your Trade Union.
- From the [Car Parking Scheme](#).
- From providers of staff benefits.
- CCTV images from our landlords or taken using our own CCTV systems.

[Back to Top](#)

## 3. What personal data do we process and why

### 3.1. Information related to your employment

We use the following information to carry out the contract we have with you, provide you access to business services required for your role and manage our human resources processes. We will also use it for our regulatory purposes in our role as a supervisory authority and to fulfil our role of promoting openness by public bodies and data privacy for individuals.

- Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses.
- Your date of birth, gender and NI number.
- Your photograph.
- A copy of your passport or similar photographic identification and proof of address documents.

- Your electronic signature when you sign off documents.
- Marital status.
- Your next of kin, emergency contacts and their contact information.
- Employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare.
- Location of employment (e.g. Wilmslow or regional offices).
- Details of any secondary employment, political declarations, conflict of interest declarations or gift declarations.
- [Security clearance](#) details including basic checks and higher security clearance details according to your job.
- Any criminal convictions that you declare to us.
- Your responses to [staff surveys](#) if this data is not anonymised.
- Your political declaration form in line with our policy and procedure regarding party political activities.
- Any content featuring you produced for use on our website, intranet or social media such as videos, authored articles, blog posts and speech transcripts.

[Back to Top](#)

### 3.2. Information related to your salary, pensions and loans

We process this information for the payment of your salary, pension and other employment related benefits. We also process it for the administration of statutory and contractual leave entitlements such as holiday or maternity leave.

- Information about your job role and your employment contract including; your start and leave dates, salary (including grade and salary band), any changes to your employment contract, working pattern (including any requests for flexible working).
- Details of your time spent working and any overtime, [expenses or other payments claimed](#), including details of any loans such as for travel season tickets.
- Details of any leave including sick leave, holidays, special leave etc.
- Pension details including membership of both state and occupational pension schemes (current and previous) and your contributions.
- Your bank account details, payroll records and tax status information.
- [Trade Union membership](#) for the purpose of the deduction of subscriptions directly from salary.
- Details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay. This includes forms applying for the relevant leave, copies of MATB1 forms or matching certificates and any other relevant documentation relating to the nature of the leave you will be taking.

### 3.3. Information related to your performance and training

We use this information to assess your performance, to conduct pay and grading reviews and to deal with any employer-employee related disputes. We also use it to meet the training and development needs required for your role.

- Information relating to your performance at work e.g. probation reviews, PDRs, promotions.

- Grievance and dignity at work matters and investigations to which you may be a party or witness.
- Disciplinary records and documentation related to any investigations, hearings and warnings or penalties issued.
- [Whistleblowing](#) concerns raised by you, or to which you may be a party or witness.
- Information related to your training history and [development needs](#).
- Leadership development profiles (360, TMS)
- Audio, video and transcriptions from any training sessions, meetings or events you attend that are being recorded.

[Back to Top](#)

### 3.4. Information relating to monitoring

We use this information to assess your compliance with corporate policies and procedures and to ensure the security of our premises, IT systems and employees.

- Information about your access to data held by us for the purposes of [criminal enforcement](#) if you are involved with this work.
- Information derived from [monitoring IT acceptable use standards](#).
- [Photos](#) and [CCTV](#) images.

[Back to Top](#)

### 3.5. Information relating to your health and wellbeing and other special category data



We use the following information to comply with our legal obligations and for equal opportunities monitoring. We also use it to ensure the health, safety and wellbeing of our employees.

- Health and wellbeing information either declared by you or obtained from health checks, eye examinations, [occupational health](#) referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work from your GP or hospital.
- Accident records if you have an accident at work.
- Details of any desk audits, access needs or reasonable adjustments.
- Information you have provided regarding Protected Characteristics as defined by the Equality Act and s.75 of the Northern Ireland Act for the purpose of [equal opportunities monitoring](#). This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.
- Any information you provide to any of our equality and diversity networks; Women's network, Pride, REACH, Healthy Minds and Access Inclusion.

[Back to Top](#)

## 4. Lawful basis for processing your personal data

4.1. Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the UK GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

4.2. Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(a) your explicit consent.
- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(f) for the establishment, exercise or defense of legal claims.
- Article 9(2)(g) – where processing is necessary for reasons of substantial public interest
- Article 9(2)(j) for archiving purposes in the public interest.

4.3. In addition we rely on the processing condition at Schedule 1 part 1 paragraph 1 of the DPA 2018. This relates to the processing of special category data for employment purposes. Our [Appropriate Policy Document](#) provides further information about this processing.

4.4. We process information about staff criminal convictions and offences. The lawful basis we rely to process this data are:

- Article 6(1)(e) for the performance of our public task. In addition we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a) of the DPA 2018.
- Article 6(1)(b) for the performance of a contract. In addition we rely on the processing condition at Schedule 1 part 1 paragraph 1 of the DPA 2018.

Our [Appropriate Policy Document](#) provides further information about this processing.

[Back to Top](#)

## 5. How long we keep your personal data

5.1. For further information about how long we hold your personal data, see our [Retention and Disposal Policy](#).

## 6. Data Sharing

6.1. In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including our data processors, training providers, our solicitors, legal advisors or counsel, government agencies and external auditors. For example, we may share

information about you with HMRC for the purpose of collecting tax and national insurance contributions.

- 6.2. Additionally we are required under the Public Records Act 1958 (as amended) to transfer records to the National Archives (TNA) for permanent preservation. Some of these records may include the personal data of our current and former employees. Full consideration will be given to Data Protection and Freedom of Information legislation when making decisions about whether such records should be open to the public.

[Back to Top](#)

## 7. Do we use any data processors?

- 7.1. Yes - a list of our data processors can be found at [Annex A](#).

## 8. Your rights in relation to this processing

- 8.1. As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority. For more information on your rights, please see '[Your rights as an individual](#)'.

## 9. Overseas transfers

9.1. We don't routinely transfer staff personal data overseas but when this is necessary we ensure that we comply with UK GDPR, ensuring appropriate safeguards are in place.

[Back to Top](#)

## 10. Further Information

### 10.1. Personnel files

Both physical and electronic records are held for each member of staff. Data is held securely on ICO systems and at our premises. Some data is held securely with our off site storage contractor OASIS Group. A link to their privacy notice can be found in [Annex A](#).

You can request your personnel file by emailing the HRteam or by submitting an access request to [accessicoinformation@ico.org.uk](mailto:accessicoinformation@ico.org.uk). You can also make a verbal request for your information. You will not be able to take away your physical file. Your access request will be handled outside of our normal cases management systems with restricted access. We will consult internally with members of staff who might hold personal data about you.

### 10.2. Car park scheme

The car park scheme is operated by staff, though the ICO does process some of the personal information of scheme members in order to make deductions from your salary. Our facilities department also hold vehicle licence plate details linked to you. These details are deleted when members leave the scheme.

### 10.3. Staff surveys

We conduct most staff surveys via the cloud based platforms Snap Surveys and Pulse 360. Any data collected is stored on UK servers. A link to their privacy notices can be found in [Annex A](#).

We take steps to ensure responses from staff are pseudonymised. This means that no one at the ICO will be able to link survey responses to particular individuals. Participation in most staff surveys is entirely optional.

Survey questions often require quantitative responses, however free text boxes are sometimes included. We would advise you not to share identifiable information about yourself in these boxes if you wish to remain anonymous. When appropriate we will also provide additional 'just in time' privacy information regarding specific surveys.

Responses to Health and Wellbeing surveys may be provided to external equality and diversity auditors.

### 10.4. Customer Surveys

When we send customers the outcome of their complaint, we ask them to complete an optional feedback survey. Responses include their case reference number and rankings relating to the service they received. We

use their feedback to help us gauge how well we're handling complaints and to identify opportunities for improvement.

## 10.5. Whistleblowers

The ICO has a policy and procedure in place to enable its current staff and ex-employees to have an avenue for raising concerns about malpractice. If you wish to raise a concern please refer to ['Speak up' - The ICO's whistleblowing policy and procedure](#). Information in this context is processed by us because it is necessary for our compliance with our legal obligations under the [Public Interest Disclosure Act 1998](#) and [The Public Interest Disclosure \(Northern Ireland\) Order 1998](#).

Although every effort will be taken to restrict the processing of your personal data and maintain confidentiality whether this is possible will be dependent on the nature of the concern and any resulting investigation.

## 10.6. Equal opportunities monitoring

Equal opportunities information provided by job applicants is attached to the relevant application on our applicant tracking system Vacancy Filler when you apply for a role at the ICO. A link to their privacy notice can be found in [Annex A](#).

This information is not made available to any staff outside our recruitment team (including hiring managers) in a way which can identify you. This information is anonymised after six months and retained for reporting purposes only.

We may periodically participate in external audits to monitor our compliance with the Public Sector Equality Duty, therefore this equality and diversity information may be provided to external auditors. You may also be asked to participate in focus groups or interviews during the course of these audits, however participation is not mandatory. A link to the auditor's Privacy Notice can be found in [Annex A](#).

We have a legal obligation to ensure that the intranet and website are accessible in line with the WCAG 2.1 guidelines. We use a third-party, Silktide, to assess the accessibility of our intranet and website. Any personal data and special category data you add to the intranet and website will also therefore be processed by Silktide to ensure that our we are compliant with these guidelines. A link to their privacy notice can be found in [Annex A](#).

## 10.7. Equality and diversity networks

Our equality and diversity networks; Women and Allies, Pride, REACH, Healthy Minds and Access Inclusion help to raise awareness of equality and diversity issues across the ICO and contribute to the development of our internal policies, procedures and practices.

Any information you share with the networks will be treated by them in confidence. Network representatives may signpost you to other ICO staff, for example HR colleagues, or appropriate third party services. Your information will only be shared by the networks with a third party if you agree to this or it is necessary to protect your vital interests or those of another person.



## 10.8. Workforce Development and Planning

Our Workforce and Development and Planning department use online learning platforms such as Civil Service Learning for the facilitation of its work related courses. We also use Learning Pool. Links to their privacy notices can be found in [Annex A](#). We will share some information about you with these providers both prior to you joining the ICO and during your employment to ensure you have the necessary access to complete training required for your role.

We will also share information about you with our training providers. For example this will include information such as your name, contact details and job role. When necessary we will also share information about any dietary or access requirements that you might have when you attend training events.

Optional psychometric testing is available for staff, facilitated by our People Services colleagues. Testing is carried out by Insights Learning and Development Limited, and further information about what personal data you will be required to share is available in their [Privacy Policy](#). The output of the testing is a Personal Profile report. These reports are treated as confidential and will only be seen by our trained facilitators in People Services and you, unless you choose to share your personal profile more widely.

Application forms to become a Mental Health First Aider are retained by the team for 3 years. Training is provided by MHFA England and staff are required to register for training via the MHFA website. For more information on how MHFA will process your personal data please see the MHFA England privacy policy.

## 10.9. Resources to help with your work

We provide access to memberships to professional bodies and journal subscriptions for the use as a resource to help you with your work. Any personal information shared with these organisations will be used to allow you to use those resources. The use of the resources should only be within the suppliers' terms and conditions and in line with [code of conduct](#).

Our memberships and subscriptions privacy notices can be accessed via the following links:

[Association of Computing Machinery](#)

[Biometrics Institute](#)

[BSI](#), [BSI Knowledge](#) and [Standards development portal](#)

[Exponential View \(Substack\)](#)

[Gartner](#) (including [GOV.UK Digital Marketplace](#))

[Global Data Privacy Laws \(Aosphere\)](#)

[Harvard Business Review \(HBR\)](#)

[Health Service Journal \(Wilmington Healthcare\)](#)

[IAPP](#)

[IEEE](#)

[International Data Privacy Law \(Oxford University Press\)](#)

[International Institute of Forecasters](#)

[JSTOR \(Ithaka\)](#)

[MLex \(LexisNexis\)](#)

[Politico](#)

[Privacy Laws & Business](#)

[World Economic Forum – Strategic Intelligence](#)

[Institute of Regulation](#)

## 10.10. Occupational health

During your employment you may be referred to occupational health following a request to HR by you or your line manager. This may result in a face-to-face consultation, a telephone appointment with an occupational healthcare professional, or a medical report from a GP or specialist.

We use BHSF to provide our occupational health service and we may share some information about you with them as part of the referral. You will be asked to provide your consent for any referral and data sharing with BHSF.

The information you provide will be held by BHSF, who will give us a fit to work certificate or a report with recommendations. A link to their privacy notice can be found in [Annex A.](#) BHSF is the data controller for the information it generates.

BUPA Occupational Health Ltd also provides health checks and screening service and eye tests. A link to their privacy notice can be found in [Annex A.](#)

Clare and Illingworth provide eye tests for our employees and will share information with us about your eye examinations.

## 10.11 Trade Union Membership

The recognised unions at the ICO (the PCS and the FDA) are controllers for the personal information connected to your union membership. The ICO holds some PCS union subscription details in order to process salary deductions for union membership for which you will have given your consent.

## 10.12. Monitoring of staff

All of our ICT systems, EDRM system and the swipe access system for the entry and exit of our premises are auditable and can be monitored, though we don't do so routinely.

We are committed to respecting individual users' reasonable expectations of privacy concerning the use of our ICT systems and equipment. However, we reserve the right to log and monitor such use in line with our Acceptable Use Policy.

Any targeted monitoring of staff will take place within the context of our disciplinary procedures.

## 10.13. Staff involved in criminal enforcement

If you are involved with the process of criminal enforcement - some staff in Legal, Intelligence or the Financial Recovery Unit - we monitor and log your access to the information being processed.

Part 3 of the Data Protection Act 2018, which concerns law enforcement processing requires us to keep logs. Section 62 states that these logs that

make it possible to establish the identity of the person who consulted the data, the date and time it was consulted and the justification for doing so. Beyond this, the logs must make it possible to establish the identity of the person disclosing the data, the date and time it occurred and the identity of the recipients. These logs will be kept to assist with self-monitoring by the ICO, including internal disciplinary proceedings, verifying the lawfulness of the processing, ensuring the integrity and security of personal data, and for the purposes of criminal or regulatory proceedings.

#### 10.14. Financial monitoring

We use a financial accounting system (Microsoft Dynamics GP) to log every financial transaction. This includes any transactions or loans made by or to staff. If an outstanding debt by a member of staff is highlighted via this process, the ICO will use this information to take steps to recover the outstanding amount.

#### 10.15. Security clearance

Basic security checks or advanced checks based on your role in line with the [Baseline Personnel Security Standards](#) (BPSS) and the government [Security Policy Framework](#) are carried out by HMRC on our behalf. For temporary staff appointments, BPSS checks are carried out by Alexander Mann Solutions (AMS) on our behalf.

The ICO's security clearance applications are processed by HMRC. Scottish applicants are required to complete a Basic Disclosure check via Disclosure Scotland.

In addition some staff are required to get Security Clearance, Developed Vetting (DV) or a Counter Terrorist Check (CTC) which is also carried out by HMRC. The outcome of these checks are stored on our systems.

### 10.16. Security passes

All staff are all issued with a security pass that displays their name, department, staff reference number and photograph. Staff pass details (names, numbers and photographs) are held on a standalone machine controlled by Facilities and can only be accessed by a restricted number of people. Photographs are uploaded to Minfo by HR staff. Should you lose your pass you will need to complete a lost security pass form and return it to Facilities. When you leave the ICO your details are deleted as soon as possible from this system.

### 10.17. CCTV

We operate CCTV at our Wilmslow and Belfast premises to monitor access to our offices. We also operate CCTV inside our Wilmslow premises to monitor access to certain areas of the office. Further information is available in our [CCTV policy](#).

Additionally, staff working in Wilmslow, London, and our other regional offices, may be filmed by CCTV which is owned and operated by the landlords or owners of the buildings in which our offices are situated. The ICO is not the data controller for this information.

## 10.18. Disclosures in response to information requests

As both a public authority and controller we receive information requests under the Freedom of Information Act (2000) and the UK GDPR and we must consider whether to disclose information about our staff in response to these requests.

Part of our commitment to transparency by design under ICO25 means we take a disclosure by default position in many circumstances.

Before, or soon after, your start date at the ICO, contact HR if you need to make us aware of a specific reason why your personal information (for example, your name, place of work and photo) cannot be provided as part of a disclosure. HR will collate this information and ensure Information Access are aware of this, should any request be made for your information. At any later point, if you have any concerns about information being released you need to inform us of this fact.

You should read our [Employee Information Disclosure Policy](#) for more detail about what information you can expect us to routinely disclose about you, and in what circumstances.

We will consider withholding information if we believe that it will prejudice our regulatory role or the rights and safety of our staff. We may consult with you when deciding whether to disclose any information that we consider would not be within your reasonable expectations - these expectations are set out in our Employee information disclosure policy.

## 10.19. Requests for references

If you leave, or are thinking of leaving, we may be asked by your new or prospective employers to provide a reference. For example we may be

asked to confirm the dates of your employment or your job role. If you are still employed by us at the time the request for a reference is received we will discuss this with you before providing this.

## 10.20. Car Sharing

The ICO Green Group operates a car sharing scheme with the aim of reducing our carbon emissions. If you sign up to this scheme then you will need to provide your name, place of work and some generalised information about your home location and the route you travel to work. Staff are discouraged from sharing their full home address as this information is published to all staff so colleagues interested in car sharing can identify suitable matches. Signing up for the scheme is voluntary and participants can withdraw and delete the information they provided at any time. The information will be kept for 12 months after the entry is last modified.

[Back to Top](#)

## 10.21. Online Events

During internal online events we may use Slido to create interactive live polls, Q and As, and quizzes. We will retain the data from these events for 3 months on order to analyse the responses and gauge the success of the event. Use of Slido is not required in order to attend the event.

[Back to Top](#)



## Feedback on this document

If you have any feedback on this document, please fill in [this feedback form](#).

[Back to Top](#)

## Version history

Version	Changes made	Date	Made by
1.0	First Published	31/04/2019	Steven Johnston
1.1	Addition of version history control. Update to Resources to help with your work.	10/06/2021	Steven Johnston
1.2	References to GDPR changed to UK GDPR.	14/06/2021	Steven Johnston
1.3	MHFA Mental Health First Aiders	10/08/2021	Tiffany Higgins
1.4	Addition of leadership development profiles. TMSDI added to list of processors.	26/08/2021	Steven Johnston
1.5	Addition of Revealing Reality to list of data processors.	06/12/2021	Steven Johnston

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
1.6	Addition of photograph in information related to employment section	10/01/2022	Simon Lochery
1.7	Added link to Harvard Business Review Privacy Notice	12/01/2022	Ben Cudbertson
1.8	Added link to MIT Technology Review Privacy Notice	21/01/2022	Ben Cudbertson
1.9	Added links to Association of Computing Machinery and International Institute of Forecasters Privacy Notices.	26/01/2022	Ben Cudbertson
1.10	Added information about external equality and diversity audits.	31/01/2022	Ben Cudbertson
1.11	Added link to the Politico privacy notice.	01/02/2022	Simon Lochery
1.12	Added link to JSTOR privacy notice.	11/03/2022	Simon Lochery
1.13	Added reference to Exponential View under Resources to help with your work.	14/03/2022	Simon Lochery

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
1.14	Explicit consent added as a processing condition for special category data, addition of Intranet in 'Information related to your employment'.	14/04/2022	Steven Johnston
1.15	Addition of Exela to Annex A.	25/04/2022	Steven Johnston
1.16	Addition of Skillsoft to Annex A.	29/04/2022	Ben Cudbertson
1.17	Updates to Disclosures in response to information requests and staff surveys content. Removed all references to BMG Research. Addition of FSP Consulting Services to Annex A.	04/05/2022	Steven Johnston
1.18	Addition of Twilio to Annex A.	13/07/2022	Steven Johnston
1.19	Added link to World Economic Forum – Strategic Intelligence privacy notice	19/08/2022	Simon Lochery
1.20	Addition of Palo Alto Networks to Annex A	30/09/2022	Steven Johnston
2.0	Review and transferred to new corporate template.	12/12/2022	Steven Johnston

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
2.1	<p>Section 10.8: Amendments to names of links to third party privacy notices.</p> <p>Addition of privacy notice links for Gartner, Gov.uk Digital Marketplace, and International Data Privacy Law.</p> <p>Removal of link to MIT Technology Review as no subscription taken out.</p>	19/12/2022	Simon Lochery
2.2	Added Comaea to Annex A.	09/02/2023	Ben Cudbertson
2.3	<p>Updated section 10.5 to include website and intranet accessibility.</p> <p>Added Silktide to Annex A.</p>	02/03/2023	Ben Cudbertson
2.4	Addition of Workday to Annex A. Addition of electronic signature to 3.1.	12/05/2023	Steven Johnston

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
2.5	Addition of link to Global Data Privacy Laws (Aosphere) privacy statement at 10.8. Annex A amended to include data disposal services for HMRC.	05/06/2023	Simon Lochery
2.6	Update to 10.17 following publication of Employee Information Disclosure Policy	05/06/2023	Steven Johnston
2.7	Removal of all references to Health Management Limited as occupational health provider. Update to 10.9 to reflect BHSF now occupational health provider.	20/06/2023	Steven Johnston
2.8	Addition of link to Privacy Laws & Business privacy policy at 10.8.	13/07/2023	Simon Lochery
2.9	Addition of section 10.20. Addition of Slido as a data processor.	17/07/2023	Ben Cudbertson
2.10	Addition of Symbiant as data processor in Annex A.	31/07/2023	Steven Johnston

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
2.11	Addition of paragraph about Insights Discovery in 10.7	22/08/2023	Steven Johnston
2.12	Link to Politico privacy notice amended at 10.8.	23/08/2023	Simon Lochery
2.13	Addition of Kainos as data processor in Annex A	22/09/2023	Simon Lochery
2.14	Addition of The Oakland Group to Annex A.	23/10/2023	Steven Johnston
2.15	Formatting changes made to meet accessibility requirements	27/10/2023	Ben Cudbertson
2.16	Addition of section 10.4 Customer surveys. Section 10 renumbered.	31/10/2023	Simon Lochery
2.17	Addition of Canva to Annex A.	04/12/2023	Steven Johnston
2.18	6.1 updated to include solicitors, legal advisors and counsel after procurement of DAC Beechcroft for the provision of legal services.	03/01/2024	Steven Johnston
2.19	Link to the Institute of Regulation privacy notice added to section 10.9	25/01/2024	Simon Lochery

<b>Version</b>	<b>Changes made</b>	<b>Date</b>	<b>Made by</b>
2.20	<p>Addition of transcriptions and meetings or events to section 3.3.</p> <p>OASIS Group added to 10.1 and Annexe A for document storage services. References to Restore removed.</p>	31/01/2024	Steven Johnston
3.0	IM&C Service annual review, no changes made.	27/02/2024	Steven Johnston
3.1	Alexander Mann solutions added to section 10.5 for BPSS checks and Annex A.	18/03/2024	Simon Lochery
3.2	Minor changes to section 10.17 CCTV.	10/04/2024	Simon Lochery

[Back to Top](#)

## Annexes

### Annex A

#### Data Processors

Data processors are third parties who provide certain parts of our staff services for us. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. Our data processors are listed below.

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Capita Business Services Ltd	Provider of payroll services	<a href="#">Capita</a>
Vacancy Filler Ltd.	Applicant tracking system for recruitment	<a href="#">Vacancy Filler</a>
Littlefish	Provider of our managed IT service for our IT infrastructure	<a href="#">Littlefish</a>
MyCSP	For administering Civil Service Pensions	<a href="#">Civil Service Pension Scheme</a>



<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Condeco	Meeting Room bookings	<a href="#">Condeco</a>
CEB	Provider of online tests	<a href="#">CEB</a>
Hays Specialist Recruitment Ltd (t/a Hays Executive)	Recruitment agency used for senior vacancies	<a href="#">Hays Recruitment</a>
BHSF Employee Benefits Ltd	Staff cash health plan Occupational Health provider	<a href="#">BHSF</a>
Legal and General	Partnership pension provider	<a href="#">Legal and General</a>
Bupa	Private medical care	<a href="#">Bupa</a>
CVS	Childcare voucher provider	<a href="#">CVS</a>
Salary Extras	Cycle to work scheme	<a href="#">Salary Extras</a>
HMRC	Security clearance applications, Data disposal services	<a href="#">HMRC</a>

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Forbes	Legal services provider	<a href="#">Forbes Solicitors</a>
CIPHR	HR records and database system	<a href="#">CIPHR</a>
Civil Service Learning	Training provider	<a href="#">Civil Service Learning</a>
Learning Pool	Training provider	<a href="#">Learning Pool</a>
Brightwave	Training provider	<a href="#">Brightwave</a>
OASIS Group	Document Storage	<a href="#">OASIS Group</a>
Snap Surveys	Staff Surveys	<a href="#">Snap Surveys</a>
Wiley	DiSC assessments	<a href="#">Wiley</a>
Canon	Printing services	<a href="#">Canon</a>
Halo	IT ticketing software	<a href="#">Halo ITSM</a>
TMSDI	TMS profiles	<a href="#">tmsdi</a>
Revealing Reality	Research Function Development	<a href="#">Revealing Reality</a>
Clear Company	Equality and Diversity auditors	<a href="#">Clear Company</a>

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Microsoft	MMD and software	<a href="#">Microsoft</a>
Exela Technologies	Digital mailroom	<a href="#">Exela</a>
Skillsoft	e-Learning provider	<a href="#">Skillsoft</a>
FSP Consulting Services Limited	Pulse 360	<a href="#">FSP</a>
Twilio	SendGrid Email API	<a href="#">Twilio</a>
Palo Alto Networks	Proxy and VPN services	<a href="#">Palo Alto Networks</a>
Comaea	Training provider	<a href="#">Comaea</a>
Silktide	Website and intranet accessibility	<a href="#">Silktide</a>
Workday	Workforce Management software	<a href="#">Workday</a>
Slido	Event management	<a href="#">Slido</a>
Symbiant	Audit Software	<a href="#">Symbiant</a>

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice</b>
Kainos	Provider of Application Management Services for Workday	<a href="#">Kainos</a>
The Oakland Group	Partner in developing the ICO Enterprise Data Strategy.	<a href="#">The Oakland Group</a>
Canva	Branded content design for internal communications	<a href="#">Privacy Policy (canva.com)</a>
Alexander Mann Solutions (AMS)	Baseline Personnel Security Standards checks for temporary staff appointments	<a href="#">AMS</a>