

Privacy Notice

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1. PRIVACY NOTICE - WEBSITE

PURPOSE OF THE POLICY

We take your privacy seriously and are committed to protecting your personal information.

This Privacy Notice sets out the way in which your personal information will be used and provides information on how we process the personal data of different individuals with whom we interact.

Our policy complies with UK data protection law which includes but is not limited to the UK Data Protection Act 2018, the Data Protection, Privacy and Electronic Communications Regulation 2020, the UK GDPR and the Privacy and Electronic Communications Regulation (PECR). This notice is intended to inform you about our processing activities in accordance with the requirements of UK Data Protection Law. Our full data protection policy is available upon request.

We have made it easy for you to let us know if you would like to change the way we process, store and use your data and the details can be found in the 'contact us' section of this document.

We may change this Privacy Notice at any time, so please check this page regularly to ensure that you are happy with any changes that may have been made. Any significant changes will be notified to you.

WHO WE ARE

Hibiscus is a registered charity in England and Wales under sections 67 and 69 of the Charities Act 2011 (Registration Number 1104094) and a company limited by guarantee (No 4533442)

Our registered address is

Hibiscus Initiatives, Resource for London, 356 Holloway Road, N7 6PA

For the purposes of UK Data Protection Law, we are the data controller in respect of the personal information which we hold about you.

RELATED POLICIES AND PROCEDURES

- Client Data Protection and Confidentiality Policy
- Staff Data Protection and Confidentiality Policy
- IT and Cyber Security Policy

WEBSITE PRIVACY NOTICE GUIDANCE AND INFORMATION

IP ADDRESSES AND COOKIES

Cookies are pieces of data created when you visit a site, and contain a unique, anonymous number. They are stored in the cookie directory of your hard drive, either temporarily or permanently. Cookies do not contain any personal information about you and cannot be used to identify an individual user. The purpose of cookies is to make the interaction between users and websites faster and easier.

The Hibiscus web site uses cookies to record aggregated usage statistics through Google Analytics. These cookies enable us:

- To estimate our audience size and usage pattern.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by changing your internet browser settings. However, by doing so you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit our website.

EXTERNAL LINKS ON OUR WEBSITE

Our site may, from time to time, contain links to external websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Data Protection Officer at GDPR@hibiscus.org.uk

If you no longer wish to be contacted by Hibiscus, please also email GDPR@hibiscus.org.uk with the word 'Unsubscribe' in the email subject.

COMPLAINTS

Should you have a complaint or other concerns about Hibiscus information rights practices please contact Hibiscus in the first instance at GDPR@hibiscus.org.uk, or at our head office on 020 7697 4120. If our response proves unsatisfactory, you have the option of contacting the Information Commissioner's Office. Please see <https://ico.org.uk/concerns> for more information.

2. PRIVACY NOTICE – RECRUITMENT AND EMPLOYMENT

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you

1. during the application process
2. during your employment with us
3. after you have left employment with Hibiscus
4. during your volunteering period with us

We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Hibiscus is a 'data controller' and gathers and uses certain information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection (employment) policy.

About the information we collect and hold

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information will be held at our offices.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our data protection privacy notice (employment).

Further details on our approach to information retention and destruction are available in our record retention policy and schedule.

Your rights to correct and access your information and to ask for it to be erased

If (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask for some, but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. We will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

RESOURCES AND APPENDIX

Data Collection Table for Recruitment

Pre-shortlisting phase

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable the administration team to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant manager or department of your application</p>
Details of your qualifications, experience, employment history (including job titles, salary, and working hours) and interests	From you, in your CV and cover letter and interview notes (if relevant)	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details</p>
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see * below</p>
Information regarding your criminal record	From you	<p>To comply with our legal obligations</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p>

		regulated sector and protecting the public against dishonesty)	For further information, see * below
Details of your referees	From you	Legitimate interest: to carry out a fair recruitment process	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) <input type="checkbox"/>	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and

		For reasons of substantial public interest preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty	other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our policy on processing special categories of data and criminal records, as required under the Data Protection Bill.

Data Collection Table for Employment and Volunteering

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
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<p>Your name, previous name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers) <input type="checkbox"/></p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>Legitimate interest: to maintain employment records and good employment practice</p>	<p>To enter into/perform the employment contract</p>
<p>Details of salary and benefits, bank/building society, National Insurance and tax information, your age <input type="checkbox"/></p>	<p>From you with the exception of the salary details which we provide</p>	<p>To perform the employment contract including payment of salary and benefits</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To ensure you receive the correct pay and benefits</p> <p>Information shared with our payroll administrators, Creative Payroll Solutions Ltd and with HM Revenue & Customs (HMRC)</p>
<p>Details of your next of kin <input type="checkbox"/></p>	<p>From you</p>	<p>To perform the employment contract including employment-related benefits, e.g. for beneficiaries of pension or death in service benefits</p>	<p>To ensure you receive the correct pay and benefits</p> <p>Information shared with our payroll administrators, Creative Payroll Solutions Ltd and with HM Revenue & Customs (HMRC)</p>
<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/></p>	<p>From you and, where necessary, the Home Office</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>

<p>A copy of your driving licence if driving is a prerequisite for the post <input type="checkbox"/></p>	<p>From you</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To ensure that you have a clean driving licence for insurance purposes</p> <p>Information may be shared with our insurer</p>
<p>Details of your pension arrangements, and all information included in these and necessary to implement and administer them <input type="checkbox"/></p>	<p>From you, from our pension administrators, Creative Payroll Solutions and where necessary from your own pension fund administrators</p>	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To comply with our auto-enrolment pension obligations</p> <p>Information shared with our pension administrators Creative Payroll Solutions Ltd and with HMRC</p>
<p>Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health) <input type="checkbox"/></p>	<p>From you, from your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators,</p>	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits</p> <p>To comply with our legal obligations to you as your employer</p> <p>Information shared with your doctors, with medical and occupational health professionals we engage and with our insurance benefit administrators</p> <p>For further</p>

			information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs. This information is anonymised and used for statistical purposes	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment). The information is anonymised and used for statistical purposes only.	To comply with our equal opportunities monitoring obligations and to follow our policies For further information, see * below
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks <input type="checkbox"/>	From you and the DBS	To perform the employment contract To comply with our legal obligations For reasons of substantial public interest, (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your trade union membership	From you or your trade union	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration and to pay trade union premiums and register the status of a protected employee Information shared with your trade union For further information, see * below

<p>Information on grievances raised by or involving you</p>	<p>From you, from other employees and from consultants we may engage in relation to the grievance procedure</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>For staff administration, to follow our policies and to deal with grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Information on conduct issues involving you</p>	<p>From you, from other employees and from consultants we may engage in relation to the conduct procedure</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Details of your appraisals and performance reviews</p>	<p>From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

<p>Details of your performance management/improvement plans (if any)</p>	<p>From you, from other employees and from consultants we may engage in relation to the performance review process</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies and to monitor staff performance</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Details of your time and attendance records</p>	<p>From you and from your timesheet</p>	<p>To perform the employment contract</p> <p>Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences</p>	<p>For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage and with our payroll administrators Creative Payroll Solutions Ltd</p>
<p>Information in applications you make for other positions within our organisation</p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

<p>Information about your use of our IT, communication and other systems</p>	<p>Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to monitor and manage staff access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality control to ensure that commercially sensitive information is kept confidential to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with for security vetting and investigating complaints and allegations of criminal offences 	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>
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		<p>for statistical analysis</p> <p>to prevent unauthorised access and modifications to our systems</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details in references about you that we give to others</p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences can be found on our policy and procedure folders on the shared drive.

Date of review: November 2023

Date of next review: November 2024