



## Document Details

<b>Document Reference</b>	<b>SMS-P-UKE-II1</b>
<b>Version</b>	<b>2.0</b>
<b>Issue Date</b>	<b>01/10/2018</b>
<b>Review Date</b>	<b>01/10/2019</b>
<b>Document Approver</b>	<b>Operations Director, UK and Europe</b>
<b>Document Author/Owner</b>	<b>Human Resources Director, UK and Europe</b>
<b>Applicability</b>	<b>UK &amp; Europe Division-wide including all business units and contracts</b>

## Contents

1	Introduction .....	3
2	Data Protection Principles.....	3
3	The Kind of Information We Hold About You .....	4
4	How Is Your Personal Information Collected? .....	5
5	How We Will Use Information About You.....	5
6	Conditions for Processing .....	6
7	How We Use Special Category Information.....	7
8	Information about Criminal Convictions .....	7
9	Automated Decision Making.....	8
10	Photography and filming .....	8
11	Data Sharing .....	8
12	Data Security.....	9
13	Data Retention .....	9
14	Transferring Personal Information Globally .....	9
15	Your Legal Rights.....	10
16	Data Protection Contacts.....	11
17	Changes to this Employee Privacy Policy .....	11

---

## Version history

Version	Date	Reason for update	for release/version	Issued by
1.0	01/05/2018	Original		Head of Ethics Regulatory and Compliance
2.0	19/09/2018	Amended		Ethics and Compliance Counsel

## 1 Introduction

---

At Serco we are committed to protecting the privacy and security of your personal information. This Employee Privacy Policy applies to all current and former employees, contractors or other workers employed by Serco.

This Employee Privacy Policy describes what personal information we collect, why we collect it, how we use it, the controls you have over your personal information, both during and after your working relationship with us, and the procedures that we have in place to protect your personal information, in accordance with the General Data Protection Regulation ((EU) 2016/679) ("**GDPR**") and the Data Protection Act 2018 (the "**Act**").

We take our responsibility for the personal information we collect about you seriously, and we aim to be transparent about how we handle it, and give you control over it. **Please read this Employee Privacy Policy carefully to understand how we handle your personal information.**

This Employee Privacy Policy is issued on behalf of Serco Group, so when we refer to "**Serco**", "**us**", "**we**" or "**our**" in this Employee Privacy Policy, we mean the Serco Group company or Serco Group companies with which you are or were employed, as identified in your employment contract, and is responsible (as a data controller) for the processing of your personal information. This may be explained in separate privacy notices made available when your personal information is first collected by that Serco Group company.

Where processing of personal information is carried out by another Serco Group company for their own purposes, that other Serco Group company may also be a data controller of your personal information. You can find out more about the Serco Group companies at [www.serco.com/ukecompanies](http://www.serco.com/ukecompanies) or by contacting us using the information in section 16.

This Employee Privacy Policy does not form part of any contract of employment or any other contract to provide services to Serco. We may update this Employee Privacy Policy at our discretion at any time.

It is important that you read and retain this Employee Privacy Policy, together with any additional specific privacy notice we may provide to you where we collect or process personal information about you, so that you are aware of how and why we are using the information and your rights in this regard.

## 2 Data Protection Principles

---

When using the term "personal data" or "personal information" in this Employee Privacy Policy, we mean information (including opinions) that relates to you and from which you could be identified, either directly or in combination with other information which we may have in our possession. It does not include data where the identity has been removed (anonymous data).

To help you understand how we handle your personal information more clearly, below is a summary of the data protection principles which guide how we use your personal information. These principles provide that personal data should be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

We have put policies and procedures in place to seek to adopt these principles in our everyday processing activities set out in this Employee Privacy Policy.

### 3 The Kind of Information We Hold About You

---

We may collect, store, and use the following categories of personal information about you:

- General employee data including full name, title, contact address, telephone numbers, email addresses, date of birth, gender, ethnic origins, marital status and dependants, next of kin and emergency contact information and National Insurance number, photographs, evidence of right to work, personal preferences such as smoking (optional), medical information, disability information (where applicable), travel and accommodation details, working time / shift pattern.
- Financial information including bank account details, payroll and share plan records and tax status information.
- Position information including job title, employee number, role and function, work history, working hours, annual leave and other leave entitlement and used, details about absence from work, training records, medical assessment details, reporting structure, date of hire, notice period, departments, salary details, pay grade, pension and benefits information.
- Education data including curriculum vitae/resume details, qualifications, language abilities, areas of expertise, training history, professional memberships and honours and awards.
- Career history data including former employers, work experience, length of time in role(s) and business(es), disciplinary and grievance records, project and industry experience, assignments undertaken/worked on, performance information, reviews, ratings/reports, insurance information and compensation history.
- Internal investigation data contained in emails or other documents which may be relevant to an internal investigation.
- Vehicle information including driving licence details, vehicle registration, car usage (mileage), insurance and accident details.
- CCTV footage and other information obtained through electronic means such as swipe card records.
- Image and/or voice captured through photography, filming, videotaping and/or audio recording;
- Information about your use of our information and communications systems.
- Responses to internal surveys.
- Building access and movement records.
- System and resource access and usage activity.
- Personal conduct information from vetting procedures.
- Details of your interest in and connection with the intermediary through which your services are supplied (as it applies to contractors and any other relevant workers).

We may also collect, store and use the following "special categories" of personal data (as defined by GDPR and the Act), including information about:

- Your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Biometric data.
- Your health, such as any information about any medical conditions and employment sickness records, including:
  - Where you leave employment and under any share plan operated by a Serco Group company the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision.
  - Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave.
  - Details for long term sickness absence management (such as making adjustments and accommodations).
  - Where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes.

Depending on the role that you hold with us, we may also process information about criminal convictions and offences, including civil offer barring information (please refer to Section 8 for further details).

Some of this information about you may have been collected during recruitment when you applied to work for

Serco, which was retained and processed as part of your on boarding as a member of Serco's workforce.

## 4 How Is Your Personal Information Collected?

---

Subject to the nature and requirements of the specific role(s) for which you are employed by Serco, we may collect personal information about you from a number of sources:

- You, as the employee, worker or contractor.
- Recruitment agencies.
- Screening and background check providers.
- HM Revenue and Customs.
- Disclosure and barring services in respect of criminal convictions.
- Share plan administrators in connection with any plans that you may participate in, and trustees of any employee benefits trusts used in connection with the operation of these plans.
- Reference requests made to third parties, including previous employers and named referees.
- Trustees or managers of pension arrangements operated by a Serco Group company.
- In the course of job-related activities throughout the period of you working for us.
- Government agencies.
- Training providers.
- Fleet management providers.
- Health providers.
- Insurance companies.
- Viewpoint survey providers.
- Professional advisors including external legal advisors.
- IT service providers.
- Client organisations for whom you may undertake activities.
- Travel service providers including car leasing organisations and fuel card providers.

## 5 How We Will Use Information About You

---

We will use the personal information we collect about you to (where applicable):

- Administer the contract we have entered into with you.
- Pay you (deducting tax and National Insurance contributions).
- Provide your employee benefits to you, such as reward programmes.
- Invite you to participate in and grant any awards pursuant to any share plans operated by a Serco Group company.
- Administer your participation in any share plans operated by a Serco Group company, including communicating with you about your participation and collecting any tax and social security due via employer withholding in connection with any share awards, and liaising as required with third party plan administrators and any trustees of an Employee Benefit Trust as required in connection with the settlement of your awards.
- Enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- Liaise with the trustees or managers of a pension arrangement operated by a Serco Group company, your pension provider and any other provider of employee benefits.
- Provide business management and planning, including accounting and auditing.
- Conduct performance reviews, managing performance and determining performance requirements.
- Make decisions about salary reviews and compensation.
- Assess qualifications for a particular job or task, including decisions about promotions.
- Gather evidence for possible grievance or disciplinary hearings.
- Make decisions about your continued employment or engagement.
- Conduct internal surveys with employees to enhance business - employee engagement.
- Make arrangements for the termination of our working relationship.
- Assess whether any adjustments need to be made to your working environment.

- Make travel and accommodation arrangements as part of your business activities.
- Obtain details about education, training and development requirements.
- Deal with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertain your fitness to work.
- Manage sickness absence.
- Comply with health and safety obligations, including reporting of incidents.
- Prevent fraud.
- Monitor your use of our information and communication systems to ensure compliance with our IT policies.
- For internal Serco promotional, training, news and information sharing purposes.
- To support business and administration functions.
- Ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Conduct data analytics studies to review and better understand employee retention and attrition rates.
- Undertake equal opportunities monitoring.

We will use your personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

## **6 Conditions for Processing**

---

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the employment contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests or those of a third party, such as ensuring that an employee is receiving appropriate training and support, and your interests and fundamental rights do not override those interests. (We have carried out balancing tests against the rights, interests and freedoms of the data subject for all the data processing we carry out on the basis of our legitimate interests)

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's vital interests).
- Where it is needed in the public interest or for official purposes.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Please note that in some circumstances we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you have any queries about our use of your personal information (including legal bases) please contact our DPO using the details set out in section 16.

## 7 How We Use Special Category Information

---

We may use special categories of your personal data in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance.
- If you leave employment and under any share plan operated by a Serco Group company the reason for leaving is determined to be ill-health, injury or disability, we will use information about your physical or mental health, or disability status in reaching a decision about your entitlements under the share plan.
- If you apply for an ill-health pension under a pension arrangement operated by a Serco Group company, we will use information about your physical or mental health in reaching a decision about your entitlement.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We use health information to ensure suitability for work.
- We use biometric controls for employees to monitor access to and the security of restricted areas.
- We use dietary information, and disability information in order to ensure appropriate facilities (e.g. rooms, training).
- We use information about sexual orientation and religion which may be collected from internal view point surveys or volunteered by the employee to enhance business – employee engagement.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Special categories of information requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information, in addition to having one of the general bases set out in Section 6 above. Where required by applicable laws, we will take steps to have in place an appropriate policy document and safeguards relating to the processing of such personal information.

We may process special categories of personal information in the following circumstances:

- Where we have your explicit written consent to do so – including where you voluntarily provide us with that personal information.
- Where we need to carry out our legal obligations or exercise rights in connection with your employment.
- The processing is necessary for establishment, exercise or defence of legal claims.
- Where it is needed for reasons of substantial public interest, such as for equal opportunities monitoring, in relation to our occupational pension scheme or preventing or detecting unlawful acts.

Less commonly, we may process and share this type of information where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have made that personal information public. We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards.

If you have any queries about our use of special category information please contact the DPO using the information in section 16.

## 8 Information about Criminal Convictions

---

For some roles we will process information about criminal convictions. We will only collect information about your criminal convictions history in relation to employment if you are employed in a designated role which is conditional on such checks being satisfactory.

Where required for your role we will carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required to carry out criminal record checks for those carrying out certain roles or operating in particular areas of work.
- Your role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (*SI 1975/1023*) and is also specified in the Police Act 1997 (Criminal Records) Regulations (*SI 2002/233*) so is eligible for a standard or enhanced check from the Disclosure and Barring Service.
- Your role requires a high degree of trust and integrity.
- We may use criminal information for vetting and fleet management (and to ensure you are legally compliant – e.g. for driving).

Your contract of employment or contract for services sets out any requirement upon you to comply with disclosure and processing of information about criminal convictions.

Where we process information about criminal convictions and offences, we do so in order to protect individuals and businesses and to comply with regulatory and legal obligations. We also need a further justification in addition to the general legal bases set out in Section 6. The processing may be on the basis of substantial public interest which includes:

- Preventing or detecting unlawful acts.
- Regulatory requirements relating to unlawful acts and dishonesty.
- Safeguarding of children and of individuals at risk.

We may also process such information in the event of a claim, as necessary for the purpose of:

- Obtaining legal advice or in connection with, any legal proceedings (including prospective legal proceedings).
- Establishing, exercising or defending our legal rights.

Where required by applicable laws, we will take steps to have in place an appropriate policy document and safeguards relating to the processing of such personal information.

## 9 Automated Decision Making

---

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## 10 Photography and filming

---

Serco often arranges for photographs and video to be taken at our sites, offices, conferences and events and these often feature our employees, contractors and workers. We will use the images and recordings resulting from such photography or filming for Serco internal promotional, news, training and information sharing purposes and based on these legitimate interests. We may use these images internally, including via Serco communication channels such as Yammer, in newsletters, on company notice boards and in training booklets. If you do not wish to be photographed or filmed please inform the photographer or individual filming at the time. If you have any concerns, please contact [dpo@serco.com](mailto:dpo@serco.com).

## 11 Data Sharing

---

We will only share your personal information with third parties for the purposes of your employment and associated processing requirements, including:

- Government agencies.
- Health providers (including the NHS).
- Professional advisors such as legal and insurance organisations.
- Local Government pension scheme actuaries.
- Training providers.

- Share plan administrators and employee benefits trust trustees.
- IT service providers.
- Communication platform providers such as Yammer.
- Future employers.
- Customers/Clients and their relevant associated organisations.
- Recruitment agencies.
- Financial organisations such as banks and card processing providers.
- Travel service providers including car leasing organisations and fuel card providers.
- Accommodation providers such as Concur Solutions.
- Vetting service providers.

Serco contracted third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow such providers to use your personal data for their own purpose and only permit those providers to process your personal data for specified purposes and in accordance with our instructions.

## 12 Data Security

---

We have put in place appropriate security measures and training to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Please refer to Serco's Group Standard on Security for further details.

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

## 13 Data Retention

---

We keep personal data in accordance with Serco internal retention procedures, which are determined in accordance with our regulatory obligations and good industry practice. These retention periods depend on the nature of the information (e.g. we apply different retention periods to our staff information as opposed to information about our customers), and may be subject to change.

Serco's Employee Personal Data Retention Guide is available on Our World. If you have any questions or concerns about how long we retain your personal data, please contact MyHR, your Line Manager or the Data Protection Officer using the details below.

## 14 Transferring Personal Information Globally

---

We operate on a global basis. Accordingly, your personal data may be transferred and stored in countries outside the European Economic Area (EEA), including the Middle East, America and Asia-Pacific, which are subject to different standards of data protection. The relevant Serco Group companies or companies will collect personal information from you in the country in which you live and from which you work. We ensure transfers within Serco Group are covered by an intra-group data sharing agreement entered into by all relevant entities within Serco Group, which contractually obliges each member to ensure that personal data receives an adequate and consistent level of protection.

Where the information is processed outside of the EEA by third parties, we will take appropriate steps to ensure that transfers of personal data are in accordance with applicable law and carefully managed to protect your privacy rights and interests. To achieve this, transfers are limited to countries which are recognised as providing an adequate level of legal protection or where we are satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- We will put in place binding corporate agreements, which will include the standard contractual clauses approved by the European Commission for transferring personal data outside the EEA, to ensure that your information is safeguarded;
- We will ensure that the country in which your personal data will be handled has been deemed "adequate" by the European Commission or the company is registered and compliant with a European Commission recognised privacy shield certification scheme; or
- We will carefully validate any requests for information from law enforcement or regulators before disclosing the information.

We will co-operate with any regulators as required by law to ensure that we remain transparent about the way we handle your personal information but will carefully validate any requests for information from law enforcement or regulators before disclosing the information.

In any case, our transfer, storage and handling of your personal information will continue to be governed by this Employee Privacy Policy. If you would like further information about the global handling of your personal information, please contact us at [dpo@serco.com](mailto:dpo@serco.com).

## 15 Your Legal Rights

---

You have legal rights in connection with your personal information. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Current Serco employees, please refer to the Country Standard Operating Procedure Subject Access Requests, available on Our World for more details. You can email your subject access request to [MyHR@serco.com](mailto:MyHR@serco.com).
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (commonly known as the "right to be forgotten"). This enables you to ask us to delete or remove personal information in limited circumstances, where: (i) it is no longer needed for the purposes for which it was collected; (ii) you have withdrawn your consent (where the data processing was based on consent); (iii) following a successful right to object (see [Object to processing](#)); (iv) it has been processed unlawfully; or (v) to comply with a legal obligation to which the Serco is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for a number of reasons, including: (i) for compliance with a legal obligation; or (ii) for the establishment, exercise or defence of legal claims.

- **Object to processing** of your personal information by us or on our behalf which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests, but if you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. You can object at any time to your personal information being processed for direct marketing (including profiling).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, but only where: (i) its accuracy is contested, to allow us to verify its accuracy; (ii) the processing is unlawful, but you do not want it erased; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or (iv) you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where: (i) we have your consent; (ii) to establish, exercise or defend legal claims; or (iii) to protect the rights of another natural or legal person.

- **Request the transfer** of your personal information. You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where: (i) the processing is based on your consent or on the performance of a contract with you; and (ii) the processing is carried out by automated means.
- **Obtain a copy, or reference to, the personal data safeguards used for transfers outside the European Union.** We may redact data transfer agreements to protect commercial terms.
- **Withdraw consent** to processing where the legal basis for processing is solely justified on the grounds of consent.

If you want to exercise any of the rights above, please submit your requests in writing to MYHR@serco.com.

We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

## 16 Data Protection Contacts

---

We have appointed a Data Protection Officer (**DPO**) to oversee compliance with this Employee Privacy Policy. If you have any questions about this Employee Privacy Policy or how we handle your personal information, please address to:

Data Protection Officer  
Serco Limited  
Enterprise House  
11 Bartley Wood Business Park  
Bartley Way  
RG27 9XB

Alternatively, please email [dpo@serco.com](mailto:dpo@serco.com) or call +44 (0)1256 745900.

We would request that you please contact your line manager, the DPO or MyHR in the first instance to try and resolve any issues you may have about how we are processing your personal data under the Employee Privacy Policy. However, you also have the right to contact your [local supervisory authority](#) at any time and lodge a complaint (which in the UK is the Information Commissioner's Office). The supervisory authority will then investigate your complaint accordingly.

## 17 Changes to this Employee Privacy Policy

---

This Employee Privacy Policy was last reviewed and updated in October 2018.

We may amend this Employee Privacy Policy from time to time, the most recent version of this Employee Privacy Policy can be accessed on the MyHR area of the Intranet and shortly also on our website [www.serco.com](http://www.serco.com). Please regularly check these pages for the latest version of this document.