



FoodCycle Workforce Privacy Notice

Review Date	February 2026
Next Review Date	February 2027
Reviewed By	SMT/ HR
Approved by	CEO

Executive Summary

FoodCycle is committed to protecting the personal data of job applicants, employees, casual workers, interns, agency staff and former employees (“staff”). We collect and process personal data to manage recruitment, administer employment, meet our legal obligations and support the effective running of the organisation.

We only collect data that is necessary, keep it secure, restrict access to those who need it and retain it only for as long as required. We do not sell personal data or use it for marketing purposes.

Individuals have rights under UK data protection law, including the right to access their personal data and request corrections. FoodCycle is committed to transparency, accountability and compliance with UK GDPR and the Data Protection Act 2018.

This notice should be read alongside FoodCycle’s Data Protection Policy, Data Retention Schedule, Data Breach Procedure and Subject Access Request Procedure.

Scope

This Privacy Notice applies to:

- Job applicants
- Current employees
- Former employees
- Casual workers
- Agency workers
- Freelancers
- Interns

Data Protection Principles

FoodCycle processes personal data in accordance with UK GDPR principles. Personal data will be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Protected with appropriate security measures

What Information We Collect

Job Applicants

We may collect:

- Name, address and contact details
- CV, employment history, education and qualifications
- Interview notes and assessment records
- Right to work documentation
- Disability information (for reasonable adjustments)
- Equal opportunities monitoring data (ethnicity, religion, sexual orientation, health)
- Criminal conviction data where appropriate for the role

Information may be obtained from application forms, CVs, interviews, identity documents, references and background checks.

Employees and Staff

We may collect:

- Personal contact details and date of birth
- Photograph
- Employment contract details
- Payroll information, bank details and National Insurance number
- Pension and benefits information
- Emergency contact details
- Right to work documentation
- Criminal record information (where required)
- Trade union membership (where applicable)
- Driving eligibility and insurance documentation (if role-related)
- Working hours, attendance and leave records
- Disciplinary and grievance records
- Performance appraisals and development records
- Safeguarding records
- Health and medical information, including disability information

Data is stored securely within personnel files, HR systems, payroll systems and other secure IT systems.

Lawful Basis for Processing

We process personal data under the following lawful bases:

- Article 6 UK GDPR
- Performance of a contract
- Compliance with legal obligations
- Legitimate interests of the organisation
- Consent (where required)

The specific lawful basis relied upon will depend on the context of processing and is recorded in FoodCycle's internal records of processing activities.

Special Category Data

Where we process special category data (such as health information, disability data, equality monitoring data or trade union membership), we rely on:

- Article 9(2)(b) – Employment law obligations
- Article 9(2)(h) – Occupational health
- Article 9(2)(g) – Substantial public interest
- Explicit consent (where required)

We do not rely on consent where another lawful basis applies.

Criminal Conviction Data

Criminal conviction data is processed only where necessary and permitted by law, including Disclosure and Barring Service (DBS) checks for relevant roles.

Why We Process Personal Data

We process data to:

- Recruitment
- Assess suitability for employment
- Conduct background checks
- Make reasonable adjustments
- Employment Administration
- Enter into and fulfil employment contracts
- Pay staff and administer benefits
- Manage attendance, leave and performance
- Manage disciplinary and grievance processes
- Support workforce planning
- Legal and Regulatory Compliance
- Verify right to work in the UK
- Comply with tax and National Insurance requirements
- Meet safeguarding duties
- Comply with employment and equality legislation
- Defend or respond to legal claims

Who Has Access to Your Data

Access is restricted to those who require it for legitimate business purposes, including:

- Line managers
- HR
- Payroll and finance
- IT staff
- Senior management

We may share data with third parties including:

- Reference providers
- DBS and background check providers
- Payroll and HR system providers
- Pension providers
- Legal advisers
- HMRC, Home Office, DWP and other statutory bodies
- Transfer organisations in the event of organisational restructuring

Where third parties process data on our behalf, they do so under written agreements and confidentiality obligations.

International Transfers

FoodCycle does not routinely transfer personal data outside the UK or European Economic Area.

Where data is processed by service providers outside the UK/EEA, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses or other recognised legal mechanisms.

Data Security

FoodCycle maintains appropriate technical and organisational measures including:

- Encrypted and password-protected devices
- Tiered system access controls
- Secure HR and payroll systems
- Confidentiality obligations
- Written processing agreements with suppliers

Any suspected personal data breach must be reported immediately in accordance with FoodCycle's Data Breach Procedure.

Data Retention

- Personal data is retained only as long as necessary.
- Unsuccessful applicant data: up to 12 months
- Payroll and financial records: 6 years
- Personnel files: 6 years after employment ends
- Pension records: in accordance with statutory requirements

Full retention details are contained in our Data Retention Schedule.

Automated Decision-Making

Recruitment and employment decisions are not based solely on automated decision-making.

Your Rights

- Under UK GDPR, you have the right to:
- Be informed
- Access your personal data
- Request correction
- Request erasure (where applicable)
- Restrict processing
- Data portability
- Object to processing based on legitimate interests
- Not be subject to solely automated decisions
- Where consent is relied upon, you may withdraw it at any time.

To exercise your rights, contact the CEO (designated Data Protection Lead.)

Complaints

If you are dissatisfied with how your data is handled, you may complain to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Helpline: 0303 123 1113
Website: www.ico.org.uk

Failure to Provide Data

Certain information (such as right to work documentation and payment details) is required to enter into or perform an employment contract. Failure to provide necessary information may prevent us from progressing an application or administering employment effectively.