



Privacy Notice – Staff

Version 1.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	Oct 2025	Oct 2026	First Policy.



Introduction

PATHWAY'S LDN LTD ("Pathways LDN", "we", "us", or "our") is committed to protecting the privacy and security of our staff's personal data.

This Privacy Notice outlines how we collect, use, and protect the personal data of all individuals working for or on behalf of the company*, in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

*This includes employees, self-employed contractors, and agency staff.

Who We Are

PATHWAY'S LDN LTD is a company registered in England and Wales with the Company Number 10239394.

Our Information Commissioner's Office Registration reference is: ZA804254.

Definitions

To ensure transparency, here are the key terms used in this policy:

- **Personal Data:** Any information relating to an identified or identifiable living person (data subject). This includes names, addresses, identification numbers, and contact details.
- **Special Category Data:** Personal data that requires higher protection due to its sensitive nature. This includes data revealing racial or ethnic origin, religious or philosophical beliefs, data concerning health, and data concerning a person's sexual orientation.
- **Processing:** Any operation performed on personal data, such as collection, recording, organising, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, or destruction.



The Data We Collect About You

We collect and process various categories of personal data necessary to manage the employment, contract, or relationship, including:

- **Identity and Contact Data:** Full name, address, personal and work email addresses, telephone numbers, and date of birth.
- **Employment Details:** Job title, department, start and end dates, salary, bank account details, National Insurance number (or tax/VAT registration number for contractors), CV, references, and disciplinary/grievance records.
- **Special Category Data (Sensitive):** Health information (e.g., fit notes, disability status for reasonable adjustments), racial or ethnic origin, and religious belief (for equality monitoring).
- **Compliance Data:** Right to work documentation (passports, visas), DBS check results, and training records (e.g., Safeguarding/Prevent).

How We Collect Information About You

We primarily collect information directly from you (e.g., during recruitment and onboarding). We also collect data from:

- **Recruitment Agencies:** Biographical and skills data.
- **Employers (for Agency Staff):** Contract, assignment, and payment details.
- **Previous Employers:** For references.
- **HM Revenue & Customs (HMRC):** Tax and National Insurance information.
- **External Bodies:** Professional bodies (for qualifications) and the Disclosure and Barring Service (DBS) for criminal records checks.
- **IT Partners:** Monitoring data related to the use of company systems (e.g., email and internet usage logs) for security and compliance purposes.



How and Why We Use Your Data (Lawful Basis)

We use your personal data for specific, legitimate purposes, underpinned by a defined legal basis:

Purpose of Processing	Lawful Basis
Employment and Payroll	Contractual Necessity (To fulfil the employment/contract agreement, pay wages/fees, and manage benefits).
Tax and Compliance	Legal Obligation (To comply with PAYE/tax laws, immigration laws, and health & safety regulations).
Safeguarding and Vetting	Legal Obligation (To comply with the statutory duty to safeguard children and vulnerable adults, requiring references, DBS checks, qualifications checks, etc).
Management and Performance	Legitimate Interests (To manage performance, professional development, resource allocation, and internal control systems).
Equality Monitoring	Substantial Public Interest (To monitor for equality and diversity across the workforce).

Sharing Your Data

We will only share your personal data where you consent, when legally required, or as necessary to manage your employment or contract. Recipients include: Recipients include:

- **HM Revenue & Customs (HMRC):** For tax and National Insurance purposes.
- **Pension Providers:** To administer pension scheme contributions.
- **Auditors:** To comply with external financial and funding audits (e.g., DfE/ESFA assurance).
- **Local Authorities/Police:** Where required by law or necessary to fulfil our statutory **safeguarding duties** (e.g., reporting concerns or allegations).
- **Professional Bodies:** To verify qualifications and training compliance (e.g., Safeguarding certification).



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- **Third-Party Partners:** Where third parties (e.g., IT support service providers, occupational health providers, etc.) provide services to us, and they require your data.
- **Previous Employers/Educators:** To gain employment/education references.

We may also share your data with medical professionals in an emergency, and where you cannot consent to life-saving treatment.

Data Security

We have put in place appropriate security measures, including physical security for paper records and technical measures for digital data, to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way.

Please see our IT security Policy for further information.

Data Retention

We retain personal data only for as long as necessary. Personnel and payroll records are typically kept for **six years** after you leave the company to comply with HMRC and legal requirements.

Your Rights

Under UK GDPR, you have the following rights:

- Right to access – obtain a copy of your data
- Right to rectification – correct inaccuracies
- Right to erasure – request deletion of your data (in certain circumstances)
- Right to restriction – limit how we process your data
- Right to object – object to processing based on legitimate interests
- Right to data portability – request a copy in a reusable format

To exercise any of these rights, please contact us using the details below.



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Contact Us

If you have any questions about this policy or how your data is handled, please contact our Directors at:

Postal Address: Belmont Building, Belmont Road, Uxbridge, Greater London, England, UB8 1HE

Email: paul@pathwaysldnlimited.com or rena@pathwaysldnlimited.com

Tel: 07508114160 or 07982906672

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data has not been handled in accordance with the law:

www.ico.org.uk

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.