



BMS World Mission HR records

Privacy Notice

Introduction

We, BMS World Mission, are the 'controllers' of the information which we collect about you ('personal data'). Being controllers of your personal data, we are responsible for how your data is processed. The word 'process' covers most things that can be done with personal data, including collection, storage, use and destruction of that data.

This notice explains why and how we process your data, and explains the rights you have around your data, including the right to access it, and to object to the way it is processed. Please see the section on 'Your rights as a data subject' for more information.

Our Data Protection contact point is dataprotection@bmsworldmission.org if you have any queries about this notice or anything related to data protection.

BMS collects and processes personal data relating to you to manage the employment, mission worker or volunteer relationship.

Personal data

'Personal data' is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include 'special categories' of data, which is information about a person's race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

BMS is committed to protecting your personal data, whether it is 'special categories' or not, and we only process data if we need to for a specific purpose, as explained below.

We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances we may receive data about you from other people/organisations. We will explain when this might happen in this Notice.

Your data and how and why we process it

In general terms, we process your data in order to enter into an employment, work or volunteer agreement with you, to meet our obligations under that agreement. Depending on your relationship with BMS the agreement may provide you with an allowance (workers) or to administer benefits and entitlements (workers and volunteers).

In some cases we need to process data to comply with our legal obligations, for example we are required to check your entitlement to work in the UK or overseas, to deduct tax and other amounts required by HMRC, to comply with health and safety law and to enable you to take periods of leave to which you are entitled. For certain positions it is necessary to carry out criminal records checks.

In other cases we have a legitimate interest in processing personal data before, during and after the end of the employment, work, volunteer relationship. This is needed for a number of essential purposes including to:

- Administer recruitment, selection and promotion processes;
- Maintain accurate and up-to-date employment, worker and volunteer records and contact details (including details of who to contact in the event of an emergency), and records of worker/volunteer contractual and statutory rights;
- Operate and keep a record of disciplinary and grievance processes, to support reasonable levels of conduct within the placement;
- Operate and keep a record of worker/volunteer performance and related processes, to plan for career development, and for succession planning and team management purposes;
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that you receive the allowances or other benefits to which you are entitled;
- Obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that you receive the pay or other benefits to which you are entitled;
- Operate and keep a record of other types of leave (including the equivalent of maternity, paternity, adoption, parental and shared parental leave), to allow effective management of our teams, to ensure that we comply with duties in relation to leave entitlement, and to ensure that you are receiving the allowances (workers) or other benefits to which you are entitled;
- Ensure effective general HR and business administration;
- Provide references on request for current or former employees;

- Respond to and defend against legal claims; and
- Maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, long-term ill health issues and for health and safety purposes) as well as to ensure that a medical condition can be managed in resource poor overseas environments and/or meets the requirements of our overseas partners. Where a role has an occupational requirement for an individual to be a committed Christian we will also hold data related to your religion and beliefs as we have a legitimate interest to do so. We will use this information to seek suitable placements for your overseas service.

Where BMS processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that BMS uses for these purposes is collected with the express consent of employees, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for.

The table below lists the specific information that BMS may hold on you:

Data held
<ul style="list-style-type: none"> • Your name, address and contact details, including email address and telephone number; • Your date of birth and gender; • The terms and conditions of your mission worker/volunteer status; • Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with BMS; • Where applicable, information about your pay/allowances, including entitlement to benefits such as pensions or insurance cover, and details of statutory deductions such as tax, national insurance, student loans and other; • Details of your bank account and national insurance number; • Information about your marital status, next of kin, dependants and emergency contacts; • Information about your nationality and entitlement to work in the UK or another overseas country; • Information related to your application to work overseas including copies of your passports, visas, travel arrangements, and any overseas partner specific recruitment process documents; • Information related to your secondment to work for an overseas partner; • Information about your criminal record where this is relevant to your employment;

- Details of your schedule (days of work and working hours) and attendance at work;
- Details of periods of leave taken by you, including holiday, sickness absence, family and other leave, and the reasons for the leave;
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- Information about medical or health conditions, including whether or not you have a disability for which BMS needs to make reasonable adjustments; and
- Equal opportunities monitoring information, including information (if you have provided it) about your ethnic origin, sexual orientation, health and religion or belief.

Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations. The list is not exhaustive but covers the type of documents we may need to hold on record.

Data	Source
Personal references	Appointed referees
Tax coding	HMRC
Payroll deductions such as student loans, court orders or other statutory deductions	HMRC
Health clearance certificates and reports	Independent Travel Health clearance specialists
Secondment agreements and partner reports	Overseas partner
Church visit evaluation	UK supporting churches

Who we share your data with

For some processing purposes we share your data with third parties. The list is not exhaustive but covers the type of documents we may need to share with third parties. This is a list of the information we may share with external recipients, and for what purpose:

Recipients of your data	Purpose for sharing
HMRC	Payment of tax / NI
BMS Pension Trustee	Payment of pension contribution
Life assurance provider	Arrangement of life cover
BMS auditor	Statutory audit
Access Consortium	Payroll calculations
Partner mission agencies	Where a worker/volunteer may be seconded
Travel Agents/Flight bookers	To enable your travel
Embassy and consulates	To acquire your visa
Overseas partners that you may work for	To ensure a successful secondment
Travel health specialists	To ensure you are fit to travel/work overseas
Third party recruitment/training/debriefing individuals	To provide effective recruitment, training and debriefing processes
Individual and church supporters	To raise prayer and funding support and facilitate hospitality
Criminal check agency	To obtain clearance for you to work with vulnerable individuals in certain roles

Certain pieces of information (see 4.3.5 and the Appendix 3- Archiving personnel files guidelines) will be sent to the BMS archives. It is not available to the public until 30 years after date of known death (or 70 years after end of service if date of death is not known).

How we store your data

Your personal data may be held temporarily in hard copy and then in electronic formats.

Electronic data, including emails, is stored on our servers or our service provider's servers, which are located and backed up in the UK/European Union. Your personnel file is securely and confidentially stored using an electronic HR system with limited access.

How long we keep your data

Information about how long we process your data for can be found in the appendix below. Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances;
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time by contacting dataprotection@bmsworldmission.org

Exercising your rights, queries and complaints

If you wish to see your file please send your request by email (dfwm@bmsworldmission.org) to arrange a time when you will be given access. This will be arranged within four weeks of the request.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk>

Appendix 1

Document Retention Policy – Mission Personnel

Note: The retention periods below show the minimum storage time. If a dispute is likely to occur, papers should be kept until the issue is settled and the possibility of a dispute no longer exists. If in doubt, the papers should be kept for a longer period. The following policy should be followed by all BMS staff.

1 All Programmes

1.1 Initial Enquirers: (e.g. original enquiry received but no application form): Delete any electronic information from ThankQ and emails 12 months after last contact. Ensure number of initial enquiries are recorded on 'Initial Enquiries Per Year' spreadsheet.

2 Teams and Action Teams (up to one year)

2.1 **Serious Enquirers who do not proceed (eg application form completed, interview may have been held):**

2.1.1 12 to 18 months after the date of last contact, delete record on ThankQ and emails. Record details for records purposes on Past Teams Database.

2.2 **Accepted Team members:**

2.2.1 Details recorded on ThankQ and Raisers Edge. All documents and filing to be stored on ThankQ (where necessary making some of the documents confidential).

2.2.2 Obtain permission (using the Further Contact Form) to continue in contact with former mission worker/volunteer. This should be completed and added to ThankQ.

2.3 **On completion of Team:**

2.3.1 Record name, gender, age, home town, home church, team, year and two references confirmation on the Past Teams Database. Record criminal record clearance number on the Safeguarding tracking spreadsheet. To be kept permanently for archive/research purposes.

2.3.2 Prayer letters stored in year groups. To go to archives on completion of the team with a 30-year restriction before they can be viewed.

2.3.3 Update Raiser's Edge record with contact preferences.

2.3.4 Six years after finish of team, delete record from ThankQ.

3 Volunteers (normally accepted for up to 2 years)

3.1 Serious enquirers who do not proceed (e.g. application form completed, interview may have been held):

3.1.1 12 months after last contact, delete record on ThankQ and from any other databases.

3.1.2 Anonymise enquirer details on enquirer pipeline for the purpose of statistical analysis.

3.2 Accepted Volunteers

3.2.1 Record details on ThankQ database and Raisers Edge. All documents to be stored on ThankQ with certain records to be stored with enhanced confidentiality e.g. references, medical records etc.

3.2.2 Obtain permission (the Further Contact Form) to continue in contact with former volunteer. This should be completed and added to ThankQ.

3.3 On completion of service

3.3.1 Update Raisers Edge record with contact preferences.

3.3.2 Record name, gender, home town, home church, programme, date service started, date service finished, country and two references confirmation on the Master List of BMS Missionaries. Record criminal record clearance number on the Safeguarding tracking spreadsheet. To be kept permanently for archive/research purposes.

3.3.3 All prayer letters to be sent to BMS archive at Regent's Park College with 30 years restriction after the mission worker's death before they can be viewed.

3.3.4 Six years after end of service, delete record on ThankQ database except the files of those people judged to have had a significant role such as starting a new and ongoing work or over 5 years of service – then treat as long-term to be thinned and sent to archives.

- 4 Mid and Long-term personnel (normally accepted for 2-4 or 4 years and over) including IMWs
 - 4.1 Serious enquirers who do not proceed (e.g. application form completed, interview may have been held):
 - 4.1.1 12- 18 months after last contact delete all communication and information.
 - 4.1.2 Record anonymous details for records purposes within enquiries database.
 - 4.2 **Appointed personnel**
 - 4.2.1 As per the Mission Worker Handbook, we hold certain documents indefinitely in the BMS archives for historical purposes (see archive list below). Data protection permission form to be filed on ThankQ record.
 - 4.2.2 Record details on ThankQ database and Raisers Edge. All documents to be stored on ThankQ with certain records to be stored with enhanced confidentiality e.g. references, medical records etc.
 - 4.3 **On completion of service**
 - 4.3.1 Update ThankQ record. Update RE record with communication preferences.
 - 4.3.2 Obtain permission (the Further Contact Form) to continue in contact with former mission worker. This should be completed and added to ThankQ.
 - 4.3.3 Record name, gender, home town, home church, programme, date service started, date service finished, country and two references confirmation on the Master List of BMS Missionaries. Record criminal record clearance number on the Safeguarding tracking spreadsheet. To be kept permanently for archive/research purposes.
 - 4.3.4 Prayer letters to be added to ThankQ from Communications database if not already added.
 - 4.3.5 Six years after end of service date thin out files for archives. Please see the Archiving personnel files guidelines (Appendix 3) for more details.

Note: General correspondence and memos should be deleted
 - 4.3.6 Six years after end of service file to be sent to BMS Archive at Regent's Park College with a restriction on the files being made public until 30 years after the date of known

death (or 70 years after end of service if date of death is not known) of the former mission worker (and their partner if applicable).

4.4 Medical files

- 4.4.1 Confidential BMS medical and psychological reports kept on ThankQ and deleted 6 years after EOS date.

4.5 Confidential files and safeguarding

- 4.5.1 In rare situations where accusations of possible misconduct occur, information is kept in confidential files. On the death of the worker this should be checked and removed or retained as necessary.
- 4.5.2 Documents relating to safeguarding issues or incidents to be kept indefinitely and securely and confidentially filed. Criminal record checks and Self Declaration notifications should be kept on ThankQ until completion of service. At end of service, name, criminal record clearance reference numbers, date issued and date of signed self-declaration should be added to the Safeguarding tracking spreadsheet.

5 Partnership files

- 5.1 Six years after service/scholarship completed, shred Supported Partner Worker files and Scholarship files except the files of those people judged to have had a significant role such as starting a new and ongoing work or over 5 years of service – then treat as long-term to be thinned and sent to archives.
- 5.2 Thin partnership, consultation, development committee, relief fund and project records five years after end of partnership and to go to Archives with 30-year restriction on being made public. Key data such as minutes of meetings, authorisation, tenancy files for overseas properties and details of the project or grant kept in perpetuity and to go to Archive after 30 years.

6 Other storage

- 6.1 General correspondence should be filed or deleted at point of receipt or two years after last contact unless deemed relevant for archive or for legal reasons.

7 Mission personnel data kept by other departments

- 7.1 Communication Department's Mission Personnel files

7.1.1 A copy of each prayer letter moved to the personnel ThankQ file after service completed.

7.2 Mission Training files

7.2.1 Personal data shredded 6 months after mission personnel has left Mission Training

7.2.2 Summary information of dates in Mission Training and courses taken kept permanently.

Appendix 2

Retention of safeguarding records

The following guidelines give indications of good practice in terms of the retention of specific types of safeguarding information.

Category	Type of Record	Retention Period
Allegations/concerns /risk assessments/ safeguarding contracts	Records of safeguarding incidents, allegations or concerns	Indefinitely
	Records that relate to safeguarding concerns/allegations about workers (paid or voluntary)	Indefinitely
	Risk assessments/ safeguarding contracts concerning known or alleged offenders	Indefinitely
Events/activities	Registers/records of events or activities	At least 3 years after the event

specifically for children and young people/adults at risk (where no safeguarding incidents or concerns raised)	Parent/carer consent forms	At least 3 years after the form has been completed
	First Aid/accident forms	At least 3 years after the form has been completed
	Health and safety risk assessment	At least 3 years after the risk assessment has been completed.
Employment	Employees', workers' or volunteers' personnel records where there are safeguarding allegations/investigations, regardless of the findings	Indefinitely
Disclosure and Barring Service (DBS) checks	Record of a Disclosure and Barring Service (DBS) check being undertaken for an employee, worker or volunteer	Indefinitely (Please see Privacy Notice of what to keep)
Discipline	Record of an employee's, worker's or volunteer's disciplinary procedure relating to safeguarding allegations/offences	Indefinitely

Appendix 3

Guidelines for Archiving of Mission Personnel Files

Long and mid-term Mission Personnel

Six years after end of service date thin out files for archives. All information to be deleted from ThankQ and email except:

- Initial application form with accompanying CV
- Full application form
- Interview notes
- Candidate Board briefing paper
- Appointment letters
- Job descriptions
- Overseas Secondment Agreements, where applicable
- Partner organisation annual reports if relevant (e.g. includes article by/on a mission worker's work)
- Significant correspondence related to work development and changes in ministry placement

- Annual letter from Director for World Mission for sending church(es)
- Deeds, legal agreements signed by the personnel on behalf of BMS (often pertaining to property or assets)
- End of Service summary document
- End of Service letter from the Director for World Mission
- Prayer letters
- Blogs and online stories

IMPORTANT: Complaints and safeguarding cases raised against the personnel should not be sent to archives but instead be held according to the DWM file retention policy.

Noted that Overseas Team Leaders' reports should be found as appendices to Board of Trustees minutes.

Decision was taken not to retain the following:

- References
- Medical or psychological documents/correspondence
- Annual reviews
- Emails relating to children's schooling, finance memos/emails
- General correspondence and memos relating to day to day life
- Personal emails to the Overseas Team Leader re: well being

Short-Term Mission Personnel (including Teams)

Six years after end of service files, delete file. Only retain blogs/prayer letters for the archives. In the case where a short-term volunteer is judged to have had a significant role (eg: starting a new and ongoing work or over 5 years of service) revert to the guidelines for mid and long-term personnel.

IMPORTANT: Complaints and safeguarding cases raised against the personnel should not be sent to archives but instead be held according to the DWM file retention policy.