

Employee Engagement Privacy Notice (The Happiness Index Platform)

Version: 1

Date: Aug 2021

Introduction

Sellafield Ltd is committed to protecting the privacy and security of your personal information.

The Employee Value Proposition (EVP) Survey will be managed by The Happiness Index company on behalf of Sellafield Ltd.

This privacy notice sets out how your personal data will be used and your rights under the UK General Data Protection Regulation (UK GDPR).

Our Contact Details

Company	Data Protection Officer (DPO)	Address	Email
Sellafield Ltd	Mike Gater	Hinton House, Birchwood, Park Avenue, Risley, Warrington, WA3 6GR	Data.Protection.Team@Sellafieldsites.com

The type of personal information we process

Pre-survey:

Prior to the survey the following personal information was provided to The Happiness Index: Sellafield Ltd email address.

During the survey:

Employees with a work email and have access to a work computer/ mobile device (most common route)	Unique survey link will be sent to an employee's work email Provides direct access to the survey site where respondents will be asked to provide their SL email address. On accessing the survey site (after the email address	Employees can access the survey through; a) Work computer/ laptop b) Work mobile phone with access to work emails
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	has been entered) each respondent is assigned a randomly generated ID, separating their responses from their work email address to ensure anonymity.	
Employees who don't have a work email / or don't have access to a work laptop/ mobile phone device (back-up)	<p>A QR code will be provided which references a URL. The QR code can be scanned using a personal mobile device</p> <p>Log on requires SL email address.</p> <p>Employees can also access via the URL itself, should they not wish (or not be able) to scan the QR code</p> <p>Log on requires SL email address as above.</p>	<p>Employees can scan the QR code using their personal mobile or personal device to access the survey</p> <p>Employees can type the URL into their browser and access in the same way as scanning the QR code (via a personal device)</p>
As above		

Additional personal information may be provided directly to Peakon by you if you choose to partake in the survey. This includes:

- any responses given to attitudinal questions that ask you about your experiences at work.
- open-ended questions, where you are asked to leave a comment. **In order to help us maintain your anonymity, we strongly advise you not to disclose any personal information in your comments which might identify either yourself or others.**

Following completion of the survey, The Happiness Index will process your responses. Sellafield Ltd will be provided with dashboards of aggregated data. Sellafield Ltd will also be provided with a copy of all responses to support future recruitment marketing activity. Note that at the point of completing the survey, respondents are assigned randomly generated IDs, separating their responses from their SL email address. This ensures that when SL is provided with a copy of the responses, the data is not attributable to individuals.

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The information provided to Sellafield Ltd will be used by the people function and communications and stakeholder engagement function in support of recruitment marketing activities only.

How we get the personal information and why we have it

Some of the personal information we process is provided to us directly by you as part of the survey.

Certain employee groups will respond to the survey in different ways, e.g. new starters usually have a higher engagement score on average than someone who has been with an organisation for more than two years. Staff may also reply differently depending on their age or if they work full or part time.

Your participation in the survey is voluntary. Sellafield Ltd and The Happiness Index may only process your personal information when the law allows.

Under the UK GDPR the lawful basis we rely on for processing this information is:

6(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

6(1)(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party....
and;

In the case where Special Category data may be processed,

9(1)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,

How we store your information

We are committed to doing all that we can to keep your data secure. There are systems and processes in place to prevent unauthorised access or disclosure of your data, e.g. data is encrypted in transit and at rest.

Your answers are treated in the strictest of confidence. At the point of accessing the survey, each respondent will be assigned a randomly generated ID reference, separating their responses from their SL email address, and making them unattributable. **In order to help us maintain your anonymity, we strongly advise you not to disclose any personal information in your comments which might identify either yourself or others.**

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The Happiness Index will delete the information collected during the survey from their systems on completion of the EVP project (within five working days of SL's request for the data to be deleted from their systems). SL will retain a copy of the anonymized responses for five years.

Aggregate results from the Employee Engagement Survey do not count as personal data and will therefore be kept in accordance with the relevant Records Retention Schedule, or until they are no longer considered useful.

Your data protection rights

Under data protection law you have several rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Please note, your rights will differ depending on the lawful basis for processing. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. However, please be aware that once the data is anonymised and aggregated there will be no way to restore the original data, including any identifiers. As a result we will be unable to delete or amend a particular response following anonymisation

Please contact your own DPO, using the contact details above, if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to your DPO.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address is:

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Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, 0303 123 1113 ico.org.uk
