

Employee Engagement Privacy Notice (Peakon Platform)

Version: 2 | Date: Jan 2025

Introduction

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

The Employee Engagement Survey will be managed by Peakon, a Workday company on behalf of the above.

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 Peakon: employee id; first name; last name; email address; business (e.g. RWM); function (e.g. Finance); department (e.g. Accounts payable); line managers email address or id; site location; job level or grade; date of birth; start date; and working pattern.

During the survey:

Employees with a work email and have access to a work computer/ mobile device (most common route)	<p>Unique survey link will be sent to an employee's work email</p> <p>Provides direct access to survey with no log on requirements – i.e., no password or ID required</p>	<p>Employees can access the survey through;</p> <p>a) Work computer/ laptop</p> <p>b) Work mobile phone with access to work emails</p>
Employees who don't have a work email / or	A QR code will be provided which references a URL.	Employees can scan the QR code using their personal mobile

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<p>don't have access to a work laptop/ mobile phone device (back-up)</p> <p>As above</p>	<p>The QR code can be scanned using a personal mobile device</p> <p>Log on requires employee ID and First Name - (if employees don't know ID, they will need to contact HR)</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 employee ID and First Name as above</p>	<p>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>
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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 optional Equality, Diversity & Inclusion questions, e.g. regarding ethnicity, disability, sexual orientation, religion, marital status, sex registered at birth & gender identity. You are under no obligation to answer any of these questions. If you choose to do so Peakon will ask you for permission. Please click the link for further information on [special category data](#).
- any responses given to attitudinal questions that ask you about your experiences at work, e.g. in terms of: autonomy; your physical work environment; management support; health & wellbeing; diversity & inclusion etc.
- open-ended questions, where you are asked to leave a comment. These provide additional context, allowing you to explain a previous answer. **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.**

Paper copies of the survey are also available on request and responses will be entered directly into the system by an internal administrator. **NB: if you choose to complete a paper copy we cannot protect your anonymity, as it will require confirmation of both your first name and ID number.**

Following completion of the survey, Peakon will process your responses. Sellafield Ltd will only be provided with dashboards of aggregated and anonymous data for groups with 10 or more respondents and will have no access to the raw data at any time. The aggregate results do not count as personal data.

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The table below shows who will have access to the dashboards. Only people in an access control group that have restricted attributes turned on can see the results for this attribute e.g. Exec level will be set to view the data for their whole function, whilst Heads of/Managers will only be able see data for their own team(s) (subject to receiving 10 or more responses). **NB: local admins and HR support will require wider system access as they will be supporting leaders across their whole function.**

Sellafield Ltd	12 - Executive 130 - Heads of Function 500 – Line managers 6 - Senior People Function Leads 3 - Admin support
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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.

Other data is already held by the NDA Group businesses and has been supplied directly to Peakon to aid benchmarking and automate the process e.g. date of birth and start date.

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.

The system also converts date of birth into age ranges for reporting purposes. An employee will automatically move into the next range when required, without any manual intervention.

Your participation in the survey is voluntary. The NDA Group businesses and Peakon 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)(b) *“processing is necessary for the performance of a contract to which the data subject is party...”*

Article 6(1)(e) *“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”*

- Understanding employee’s feelings about working in the NDA Group can inform decisions taken to improve these experiences, and ultimately organisational performance. It is also important to know if groups of staff with specific characteristics have a better or worse experience of working for the NDA Group, so that appropriate action can be taken to level this experience, i.e., by asking employees demographic/ sensitive attribute information we are able to cut the data

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and understand whether certain groups of employees feel less inclusive/ valued etc.

Our lawful bases for processing your sensitive personal data within free-text fields is:

Article 9(2)(b) *“processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or the data subject in the field of employment...”* and

Article 9 (2)(g) *“Processing is necessary for reasons of substantial public interest...”*

- It is important to know if groups of staff with specific demographic characteristics have a better or worse experience of working for the NDA Group, so that appropriate action can be taken to level this experience.
- Processing is of data concerning ethnicity, religious or philosophical belief, health including disability or sexual orientation, it is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with a view to enabling such equality to be promoted or maintained.

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. All individual-level responses to the Employee Engagement Survey will only be seen by a restricted group of appropriate Peakon staff who require access to fulfil the responsibilities of their roles.

All survey data will be stored securely in Amazon Web Services European data centres

Peakon will keep the raw data for:

- five years (maximum) during the lifetime of the contract with the NDA Group businesses
- 90 days after termination of the contract or
- company-wide anonymisation can be activated at any time at the request of the NDA Group businesses

*When Peakon refers to deletion they mean anonymisation in an irreversible way.

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.

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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:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, 0303 123 1113 ico.org.uk
