

## RAFAC PRIVACY NOTICE – CFAV

Contact Details of MOD's Data Protection Officer and RAFAC Data Protection Advisor:

Data Protection Officer: MOD Data Protection Officer

Address: Ground Floor, Zone D Main Building, Whitehall, London SW1A 2HB

Email: [cio-dpa@mod.gov.uk](mailto:cio-dpa@mod.gov.uk)

Data Protection Advisor: SOI Policy and Plans, Mr Geoff Hewett

Address: HQ RAFAC, RAF Cranwell, Sleaford, Lincolnshire, NG34 8HB

Telephone: 01400 267288

Email: [geoff.hewett416@mod.gov.uk](mailto:geoff.hewett416@mod.gov.uk)

RAFAC is committed to protecting your privacy. This notice details the information we collect from you and the steps we take to ensure this information remains confidential.

To effectively administer and manage the RAFAC we need to gather and process your personal data. We do this in accordance with the regulations contained within the DPA 2018 which incorporates the General Data Protection Regulations (GDPR). At all times, we set out to ensure that we hold the minimum amount of your personal data necessary to administer the RAFAC, that your data is held securely and that your data is deleted as soon as we do not have a need to retain it.

### Data Protection Principles

We will comply with the data protection principles under the Data Protection legislation. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### What categories of information do you collect and process?

Personal data, or personal information refers to any information about individuals from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect, store, and use the following categories of personal information about you:

- Personal contact for example: name, title, addresses, telephone numbers, and personal email addresses.
- Dates of birth.
- Gender.
- Marital status.
- Next of kin, emergency contact details.
- National Insurance number.
- Bank account details.
- Start date, leaving date.
- Location of workplace.

- Copy of driving licence, passport, birth certificates.
- Recruitment information, references and information included in a CV or cover letter or as part of the application process.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Sounds or visual images (for example, photographs, videos).
- Accident book, first aid records, injury and third-party accident information.
- Evidence of how you meet the nationality requirements and confirmation of your security Clearance. This can include passport details, nationality details and information about convictions/allegations of criminal behaviour.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition.

### **Why are you processing my personal information?**

Your personal data is being collected and processed to administer and manage the RAFAC, to enable us to comply with our legal obligations and to carry out the function as a government department. This processing is necessary for the purposes of the legitimate interests pursued by MOD as data controller and can include:

- Making decisions about your recruitment or appointment.
- Checking you are legally entitled to work in the UK and to provide you with the security clearance appropriate for your role.
- Paying you.
- General administration of any contract we have entered into with you.
- Complying with health and safety obligations.
- To monitor your use of our information and communication systems.
- Dealing with Freedom of Information Act/Environmental Information Regulations requests.
- To maintain our records and information or databanks.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated or new purpose, we will notify you and we will explain the legal basis which allows us to do so.

- The DPA 2018 basis for the processing of your personal data is Public Task. 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

### **Where do you get my personal data from?**

- We gather your personal data from both paper and electronic application forms which you complete as part of the RAFAC administrative and management processes.

## Do you share my personal data with anyone else?

- RAFAC will not share your personal information with anyone else. Statistical information may be derived from your personal data and this statistical data may be shared with third parties but it will not contain any identifiable personal information. The exception to this rule is if educational credentials are required to be shared with awarding bodies who are a trusted source, for the provision of a qualification. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure, in a contractual arrangement.
- We may share information when there is an issue that puts the safety of cadets or staff at risk or with law enforcement and government authorities where we are legally required to do so

## Do you transfer my personal data to other countries?

- RAFAC will not transfer your personal data to other countries.

## How long do you store my personal data?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After the retention period has elapsed all data will be destroyed securely in line with MOD data destruction policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. When you leave RAFAC we will retain and securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations.

- Your personal data will be stored in a secure Information Technology system - BADER. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed
- We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office (ICO) of a suspected breach where we are legally required to do so.
- A comprehensive retention schedule for data that RAFAC holds can be found in the [RAFAC Information Management Directive](#) however, at present The Independent Enquiry into Child Sexual Abuse (IICSA) which is a government led investigation requires us to retain all information. This is held securely.

## What rights do I have?

- **The right to be informed.** Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR.
- **The right of access.** Individuals have the right to access their personal data and supplementary information.
- **The right to rectification.** The GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.

- **The right to erasure.** The GDPR introduces a right for individuals to have personal data erased. The right to erasure is also known as ‘the right to be forgotten’. Individuals can make a request for erasure verbally or in writing.
- **The right to restrict processing.** Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances.
- **The right to data portability.** The right to data portability allows individuals to obtain and reuse their personal data for their own purpose across different services.
- **The right to object.** Individuals have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

### How do I complain if I am not happy?

We take your privacy very seriously and we always aim to be clear to you about the way RAFAC manages data. We make sure our privacy notice is up to date, and as comprehensive as possible, but it doesn't cover every aspect of our collection and use of personal data. If you are unhappy with any aspect of this privacy notice, or in the way that your personal information is being processed, please contact the RAFAC Data Protection Advisor at:

Data Protection Advisor  
 HQ RAFAC  
 RAF Cranwell  
 Sleaford  
 Lincolnshire  
 NG34 8HB  
 Tel 01400 267288  
 Email: [Geoff.Hewett416@mod.gov.uk](mailto:Geoff.Hewett416@mod.gov.uk)

If you are still not happy, you have the right to lodge a complaint with the MoD Data Protection Officer (DPO):

Data Protection Officer  
 Ground Floor, Zone D  
 Main Building  
 Whitehall  
 London  
 SW1A 2HB  
 Email: [cio-dpa@mod.gov.uk](mailto:cio-dpa@mod.gov.uk)

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office  
 Wycliffe House  
 Water Lane  
 Wilmslow  
 Cheshire  
 SK9 5AF  
 Tel: 0303 123 1113  
 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
<https://ico.org.uk/global/contact-us/>