

## **Work&Grow Coach Privacy Policy**

### Contents

1. Introduction.....	2
a) Purpose of this notice.....	2
b) Data controller.....	2
2. How we process your personal data.....	2
a) Recruitment data.....	2
b) Headhunting data.....	3
This is.....	3
c) Online application usage data.....	3
d) Assessment data.....	3
e) Photos of you.....	4
f) Onboarding.....	4
f) Coach profile data.....	4
g) Contract data.....	4
3. RECRUITMENT.....	4
a) Applicant 1 <sup>st</sup> stage materials.....	4
b) Applicant 2 <sup>nd</sup> stage preparation document.....	6
4. ONGOING RELATIONSHIP BETWEEN COACH AND WORK&GROW.....	7
a) Coach update data.....	7
b) Coach relationship data.....	7
c) Feedback data.....	7
5. Diversity and equality monitoring and reporting.....	7
a) Diversity data.....	8
6. Why we use personal data.....	8
a) Core processing purposes.....	8
b) Diversity and equality monitoring and reporting purposes.....	8
c) Data collected in response to multiple choice questions.....	8
d) Data collected in response to free text questions.....	8
7. Who we disclose personal data to.....	9
8. Security.....	9
9. Length of data storage.....	10
10. Your personal data rights.....	10
a) How to exercise these rights.....	11

b) Complaining to a supervisory authority .....	11
c) Accessing your personal data .....	11
11. Changes to this privacy notice .....	12
12. Contact .....	12
13. VERSION CONTROL.....	12

## **1. INTRODUCTION**

### a) Purpose of this notice

This notice describes how work & Grow (“we”, “us”, “our”) process the personal data we obtain in connection with recruiting and engaging Work&Grow coaches. This notice is directed at both new and existing coaches to help them understand how and why we use this personal data.

### b) Data controller

For the purposes of data protection laws applicable in the UK, the data controller of processing described in this notice as Work&Grow, a company registered and operated by Jeja Holdings Ltd, a company limited by shares and registered in England and Wales under company number 12526329, whose registered office at No.15 7 Alfred Street, London, E3 2BE. Our VAT number is 410729030.

## **2. HOW WE PROCESS YOUR PERSONAL DATA**

In this section we explain the types of personal data we obtain in connection with recruiting and engaging Work&Grow coaches, the purposes we use that data for and the legal bases we rely on to process personal data for those purposes.

We obtain and use different types of personal data about you at various stages of our relationship with you, from your initial application through to assessment, accreditation, onboarding and our ongoing relationship and communications with you.

### Types of personal data we obtain

We obtain different types of personal data about you at the various stages of our relationship with you, as explained below:

#### a) Recruitment data

This is information that you provide to us as part of your application to become a Work&Grow coach, including:

- CV/Covering letter is information you provide to us in your CV and covering letter
- Application form is information you provide to us including your name and email address; your phone number and any company/organisation you are currently involved with (if you choose to provide that information), any links to

social media or other online information about you that you choose to provide and any additional information you choose to give about yourself using the free-text fields.

- Coaching journal/log is information you provide to us which covers your coaching practice, we rely on you to anonymise the content of this so it does not share personal information relating to any of your coaching clients.

b) Headhunting data

This is information we obtain about you from the coaches already in the Work&Grow coaching faculty who refer their peers for open vacancies. This could include data relating to name, email, contact numbers, social media profiles.

Work&Grow might also obtain information on potential new coaches from proactive research completed by Work&Grow recruitment staff, or those working on our behalf.

c) Online application usage data

This is information that we might collect if you apply to become a coach via our website, our IT system may automatically collect data from your device and browser such as:

- Technical data about your device and browser such as the Internet Profile (IP) address used to connect your device to the internet, geographical location, browser type and version, time zone setting, browser plug-in type and version, operating system and platform and login information
- Information about your use of our website such as referral source, length of visits to certain pages, page views, website navigation paths including the clickstream to, through and from our sites (including date and time), products viewed or searched for, page response times, download errors, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from pages.
- This data is collected automatically by our analytics tracking system and third-party services and involves the use of cookies. (see our [cookie policy](#) for more information about our use of cookies.)

d) Assessment data

This is information relating to applicant suitability to progress through our recruitment process. Any personal data that you provide to us during either our first or second stage of selection, we will record, either in the form of written notes or a voice/film recording. Any personal data captured in the recording of your delivery of a session, submitted to us as part of the application process. This will only be kept for the purpose of auditing our recruitment process. This data will be both factual and opinion based. It will be captured by coaching specialists based on eligibility criteria set out in the assessment and selection process.

## e) Photos of you

During the course of your onboarding we may request a photo of you to be used in our marketing materials. These materials will be used during presentations to potential clients and on our website.

## f) Onboarding

During the onboarding process, we will require references from those you have worked with in the past, proof of identification and proof of address. This data will be kept for the purpose of auditing our recruitment process only.

## f) Coach profile data

This information will be pulled together during onboarding. All coaches will write their own Work&Grow coach profile, including: gender, time zone, coaching experience, and qualifications, spoken and written languages, biography, testimonials, and a photo of you.

Work&Grow reserves the right to make changes to your coach profile information for style and consistency.

## g) Contract data

This information is provided by you and will be used to enter a non-exclusive consultancy contract engaging you as a Work&Grow coach, including: your name, address, contact details and banking details for the purposes of receiving payments under the consultancy contract.

**3. RECRUITMENT**a) Applicant 1<sup>st</sup> stage materials

We will complete a review of information provided by the applicant to become a Work&Grow coach. This document assesses whether the applicant meets the requirements to progress to 2<sup>nd</sup> stage of assessment and selection.

This template will be completed for each applicant.

Name of applicant			
Date			
<b>Eligibility criteria:</b> Does the applicant meet the eligibility criteria to become a coach with Work & Grow?			
Hold a professional accreditation/qualification? <i>(Check copies of certificates for qualification)</i>	Yes	No	Provide details:

<i>and accreditation with professional body)</i>			
Have experience of coaching? <i>(Check coaching portfolio, minimum of 100 hours coaching required)</i>	Yes	No	Save a copy of coaching portfolio
Complete a CPD log demonstrating coaching completed, supervision undertaken and professional development? <i>(Check CPD log for evidence of all three)</i>	Yes	No	Save a copy of CPD log
Have experience as a leader in business <i>(Check CV history)</i>	Yes	No	Provide details of most recent leadership role:
<p><b>Coaching style:</b> Review the 15 minute “coaching conversation” file provided with application. Which of the following elements does it demonstrate (must meet at least 3 areas)?</p>			
Contracting/re-contracting	Yes	No	
Using a coaching model	Yes	No	
Demonstrating coaching skills	Yes	No	
Exploring options/opportunities	Yes	No	
Prioritising options/opportunities	Yes	No	
Agreeing actions/next steps	Yes	No	
<p><b>Feedback:</b> Identify feedback to share with the applicant, irrespective of whether you are going to recommend to progress to 2<sup>nd</sup> stage or not.</p>			
Positive feedback		Developmental feedback	

<p><b>Scoring applicant:</b> Use the scoring grid below to identify whether you believe the applicant should be progressed to 2<sup>nd</sup> stage of assessment and selection.</p>	
1	Applicant doesn't not meet minimum expectations. The answers they provide doesn't demonstrate alignment with Work&Grow approach. Their experience will add value to the Work&Grow offering.
2	Applicant meets minimum expectations. The answers they provide demonstrates alignment with Work&Grow approach. Their experience supports the Work&Grow offering.
3	Applicant exceeds beyond our minimum expectations. The answers they provide demonstrates strong alignment with Work&Grow approach. Their experience adds depth and breadth to the Work&Grow offering.
<p>Decision: Will this applicant be progressed to stage two?</p> <p style="text-align: center;">Yes / No</p> <p><i>Circle as appropriate.</i></p>	

b) Applicant 2<sup>nd</sup> stage preparation document

The purpose of this document is to support applicants prepare for the 2<sup>nd</sup> stage of the assessment and selection process, to become a Work&Grow coach.

The 2<sup>nd</sup> stage process consists of each of these activities and will take a total of approximately 2 hours to complete, breakdown as:

- Values interview
- Professional discussion
- Coaching practice
- Opportunity to ask panel questions

Work and Grow follow the values of:

Value	Description
Resilience	This refers to both physical, mental, and spiritual wellbeing. As part of this value, we expect both coach and coachee to focus on practicing the art of maintaining positive balance. We recognise

	there are many ways of demonstrating resilience; in coaching we should reflect these in everything we do.
Confidence	This refers to the confidence of the coachee to achieve their full potential in everything they do, both in their personal and professional lives.
Self-efficacy	This refers to the coachees self-beliefs and personal values. They are encouraged to be in control of all aspects of their personal and professional life.

During the professional discussion interview, we want to explore your coaching style, approach to coaching, and better understand how you might approach challenging coaching discussions. We will also explore your leadership experience; you should be prepared to share examples.

When presenting your examples, you should follow:

<b>Situation</b>	Describe the <b>situation</b> , this should be kept concise.
<b>Task</b>	Explain the <b>task</b> you were responsible for.
<b>Action</b>	Describe the <b>action</b> you took.
<b>Result</b>	Share the <b>result</b> you achieved; what did you learn.

During the coaching practice you have the opportunity to demonstrate your coaching approach, style, and skills.

You will have the opportunity to ask questions to the interview panel.

#### **4. ONGOING RELATIONSHIP BETWEEN COACH AND WORK&GROW**

We will retain the following data during our ongoing relationship with you.

a) Coach update data

This includes any other information that you choose to give us during your ongoing relationship with us, such as updated contact details, emergency contact details, additional skills, experience, or qualifications, professional insurance details.

b) Coach relationship data

This information is compiled and retained about you during our contractual relationship for example, the coaching programmes you have delivered, further training you have received, additional certifications you have achieved, feedback about you from coaching clients, performance data and payments made to you.

c) Feedback data

This information relates to your delivery of a coaching programme to Work&Grow clients, feedback provided by coachees in sessions delivered by you.

#### **5. DIVERSITY AND EQUALITY MONITORING AND REPORTING**

a) Diversity data

This data relates to diversity and equality relating to your gender, age, job role, educational background, childcare and other caring responsibilities, racial or ethnic origin, religious or philosophical beliefs, disabilities, physical or mental health and sexual orientation and any other personal data that you choose to provide all collected via diversity and equality monitoring surveys we may ask you to complete or from coach profile data you provide to us; and information relating to your views, opinions and feelings in relation to the subjects covered in the survey.

## **6. WHY WE USE PERSONAL DATA**

a) Core processing purposes

This section describes the main purposes for which we use personal data in connection with recruiting and engaging Work&Grow coaches, the types of personal data we use for those purposes and our legal bases for doing so.

We use different types of personal data about you in the various stages of our relationship with you.

b) Diversity and equality monitoring and reporting purposes

We will use diversity and equality data to monitor and report on how diverse our coach network is and demonstrate this to our clients. Some of the diversity data we may collect, could include information relating to health (including disability), race or national or ethnic origin, religious, philosophical, or moral beliefs and sexual orientation, will constitute 'special category personal data' if it can be linked to identifiable individuals. We will comply with local data protection laws in all cases.

We aim to collect diversity data from coaches via questionnaires in an anonymous way and use only aggregate data for our monitoring and reporting purposes. However, this information may nevertheless be deemed to be personal data because of the potential for us to identify individuals using extra linking data such as IP addresses (which may be automatically collected when coaches complete the questionnaire) or our own familiarity with the individuals that make up our coach network.

c) Data collected in response to multiple choice questions

We could use non-specific category personal data collected via multiple choice questions in questionnaires for the purposes of understanding how diverse our coach network is and demonstrating this to our clients.

d) Data collected in response to free text questions

If we use any personal data, including special category personal data, included in comments collected via free text questions, we take the stance that the respondent has consented to us processing that data. Coaches will be given the opportunity to



explicitly consent to our use of that information for one or more specified purposes when they submit any comments via free text questions.

## **7. WHO WE DISCLOSE PERSONAL DATA TO**

The personal data described in this notice may be disclosed to the following categories of recipients, where and to the extent necessary for the purposes described in this notice:

- Our partners: this currently includes Work&Grow and the Financial Times.
- Insurers and professional advisors: such as lawyers, accountants and business and marketing consultants.
- Prospective buyer: if we propose to sell or do sell any of our business or assets, some of the personal data described in this notice may be reviewed by the prospective buyer and/or compose as asset transferred to the buyer.
- Social media platforms: if you communicate with us via any social media platforms the providers of those platforms will process data sent or received via those platforms.
- Service providers: we use a number of service providers in connection with our website, services, communications, and IT infrastructure, which involves those service providers processing some of the personal data described in this notice to the extent necessary to provide the relevant services.
- Clients and coachees working for our clients (both current and future): in order to book you to deliver particular coaching programmes and enable Work&Grow coaching participants to select a coach, arrange and attend coaching sessions, and communicate with their coach. Additionally, we may disclose your personal data to other organisations or individuals where disclosure is necessary for the purposes set out in the 'Other processing purposes' section above, for example if we are under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply the terms of any agreement to which we are a party, or to protect the rights, property, or safety of Work&Grow, our customers, or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. In all cases, we will only share personal data with such recipients where and to the extent necessary for the relevant processing purpose and in accordance with applicable data protection law.

## **8. SECURITY**

We will take appropriate technical and organisational precautions to secure the personal data we process and prevent accidental or unlawful destruction, loss or alteration and unauthorised disclosure of, or access to, that personal data.

Where we have given you (or where you have chosen) a password that enables you to access our coach portal or certain parts of our website, you are responsible for keeping this password confidential, and for all use made of your account with such password. We ask you not to share a password with anyone.

We will notify affected individuals and any applicable regulator of any personal data breach where we are legally required to do so.

## **9. LENGTH OF DATA STORAGE**

We will retain data only for so long as is necessary for the purposes for which we hold it.

This may vary according to the type of personal data and the purpose for which we use it.

In determining how long we retain personal data, we take into consideration the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means, our legal obligations, good industry practice, the guidance of relevant UK authorities such as HMRC and also tax, accounting and health and safety rules.

If you are not successful in your application to become a Work&Grow coach, we will delete the information we have received about you within a month of us informing you of the outcome of your application. However, if you indicated at the point of applying that you were happy for us to contact you about future job opportunities for up to two years, we will retain your information for up to two years after informing you of the outcome of your application.

## **10. YOUR PERSONAL DATA RIGHTS.**

You have various rights under data protection law in respect of our processing of your personal data. These include rights to:

- Object to us processing your personal data for direct marketing purposes.
- Withdraw any consent you may have given for our processing of your personal data (if our processing is based on your consent).
- Access the personal data we hold about you.
- Ask us to rectify any personal data we hold about you that is inaccurate or incomplete.
- Ask us to delete any personal data we hold about you (in certain circumstances).
- Ask us to restrict our processing of your personal data (in certain circumstances).
- Object to our processing of your personal data (in certain circumstances).
- Require us to give you the personal data we hold about you in a structured, commonly used and machine readable format so that you can provide the data to another data controller, in certain circumstances.

The availability of these rights varies depending on the legal basis we rely on for processing the relevant personal data, and some rights are qualified (rather than

absolute) under applicable data protection law, which we will discuss with you following your request.

a) How to exercise these rights

You can exercise any of the rights set out above, free of charge, by using any applicable methods set out in our communications with you, or by contacting us at Work&Grow.

We may ask you to provide further information in order to confirm your identity. Please also note that if you submit unfounded or excessive (for example repetitive) requests to exercise any of these rights, we are permitted under the applicable data protection law to charge a reasonable fee for providing the requested information or taking the requested action, or to decline your request.

b) Complaining to a supervisory authority

You also have the right to lodge a complaint about our processing of your personal data with the supervisory authority if you are concerned that we are processing breaches data protection legislation or does not respect your rights under data protection law.

You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

The Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)) is the supervisory or authority in the UK, which is responsible for overseeing the application of, under enforcing, data protection law. Relevant contact details for the ICO can be found here: <https://ico.org.uk/concerns/>

c) Accessing your personal data

You have the right to obtain from us:

- Confirmation as to whether we are processing [including holding] personal data about you; and
- if we are processing personal data about you, you are entitled to be provided with:
  - Information as to the purposes for which we process the data.
  - Information as to the categories of data that we are processing.
  - Information as to the recipients or categories of recipients to whom the data has or will be disclosed.
  - Information as to the envisaged. For which we will store the data, or if not possible, the basis on which that. Will be determined.
  - If the data was not collected from you, information about the source of the data.
  - Information about any automated decision- making that produces legal effects concerning you or similarly affects you.

- Information about the appropriate safeguards used for any transfer of personal data about you outside the EEA.
- A copy of the data (further copies are available at a reasonable charge, which we will inform you of should you request further copies). Please note that this right is subject to the rights and freedoms of others in relation to their own personal data.

## **11. CHANGES TO THIS PRIVACY NOTICE**

Any changes we make to this privacy notice in the future will be posted on our website and our coach portal and, where appropriate, notified to you by e-mail or other suitable method.

## **12. CONTACT**

Questions, comments, and requests regarding this privacy notice are welcomed and should be addressed to [info@workandgrow.co](mailto:info@workandgrow.co)

## **13. VERSION CONTROL**

Version	1.1
Date published	October 2023