

What is a privacy notice?

Argyll & Bute Women's Aid (ABWA) wants to ensure you understand our processing of your personal data. We are also required by data protection regulation to explain certain matters to you. This notice sets out that information. This privacy notice tells you what to expect when ABWA collects personal information about job applicants and our current and former employees and volunteers. Information about service users and supporters' data is contained in a separate privacy notice, which is available on our website or using the contact details set out below. For the avoidance of doubt, this privacy notice does not form part of any employees' contract of employment, and we may update it at any time.

Employees and Volunteers

The categories of information that we collect and hold include:

- *For employees and volunteers:* personal information (such as name and address, date of birth, contact details, immigration status, next of kin and bank details);
- *For employees:* employment information (such as support and supervision sessions, performance, disciplinary and grievance information, sickness absence records) qualification, training and learning records); and
- *For employees:* information in relation to payroll and tax (such as tax records, national insurance, sick pay and maternity pay information)
- *For volunteers:* volunteering information (such as support and supervision sessions, records of complaints or concerns, attendance records)

For both employees and volunteers we may also collect, store and process the following "special categories" of more sensitive personal information as well as any details of any criminal convictions you may have in order to exercise rights and obligations under employment law or for reasons of substantial public interest:

- your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- any trade union memberships you hold;
- information about your health, including your sickness absence records.

In particular, we may collect, store and process these types of information in order to carry out equal opportunities monitoring, manage your sick leave (for employees), implement health and safety or security measures and any other legitimate purpose.

How and why will we use your personal information?

As you will appreciate, we need to use your personal information to administer your employment or volunteer position. In most cases, we will use your personal information to perform your contract (for employees) or your volunteer agreement (for volunteers), to comply with our legal obligations, or where we need to in order to further ABWA's legitimate interests. In rare cases, we may need to use your personal information to protect your (or someone else's) best interests or if it is in the public interest for us to do so.

The situations in which we will commonly use employees' personal information include:

- determining your recruitment and the terms and conditions of your employment;
- administering your pay and benefits;
- managing your holiday, sick leave and any other absences including family leave;
- appraising and managing your performance and providing you with training;
- dealing with disciplinary matters and any grievance raised by or involving you;
- making decisions about your continued employment and your terms and conditions.

The situations in which we will commonly use employees' and volunteers' personal information include:

- carrying out equal opportunities monitoring;

- implementing health and safety regulation or security measures;
- providing evidence of the work we have carried out to our funders;
- to comply with our obligations to the SSSC for registered staff;
- managing and planning the running of our organisation;
- ensuring compliance with our rules and processes, for example:
 - we monitor CCTV records to ensure compliance with our policies regarding theft, health and safety and harassment;
 - we monitor use of our IT systems, including email, internet and intranet, organisation mobile and landline phones, computers and tablets to gather evidence in respect of any potential wrongdoing.

ABWA's relevant legitimate business interests include:

- recruitment and succession planning;
- complying with our regulatory obligations;
- ensuring that appropriate information is provided to funders;
- the organisation and distribution of work;
- management forecasting;
- promoting equality and diversity in the workplace;
- ensuring health and safety in the workplace;
- protection of ABWA property and property belonging to third parties;
- maintaining an efficient employee benefits program; and
- maintaining a well-managed and orderly workforce and organisation.

We are guided by the principle that you should not be surprised by any use we make of your personal information. Your personal data will only be retained for as long as is reasonably necessary. What this means in practice will vary as between different types of information, and when we consider our approach we take into account any ongoing need for the information, as well as our legal obligations for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations. All employee personal information will be deleted at the end of the reasonably necessary period. You have the right to make a complaint to the ICO and to seek to seek to enforce this right through a judicial remedy.

Job applicants

ABWA is the data controller for the information you provide during the process unless otherwise stated.

What will we do with the information you provide to us?

The information you provide during the recruitment process will only be used for the purpose of progressing your application, equal opportunities monitoring and to fulfil legal or regulatory requirements. We will not share any of the information you provide during the recruitment process with third parties or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information. You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

Shortlisting

Anyone involved in shortlisting applications for interview will not be provided with your name or contact details or with your equal opportunities information (if you have provided it). These details will only become available after the shortlist is agreed, in order to arrange interviews.

Assessments

We might ask you to participate in assessment days, complete tests or occupational personality profile questionnaires and/or to attend an interview, or a combination of these. Information will be generated by you and by ABWA. For example, you might complete a written test or we might take interview notes. This information is held by ABWA.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained by us for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom, seek assurance as to their trustworthiness, integrity and reliability, for some roles undertake PVG or Disclosure Scotland checks and / or register with the SSSC.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- If necessary for your role you will be asked to complete a criminal records declaration to declare any unspent convictions. Depending upon the role you may be asked to complete a PVG or Disclosure Scotland application.
- Depending on your role, you may be asked to provide us with details of your SSSC registration or we may obligate you to register within a specified time and provide us with details of your registration.
- We will contact your referees directly, using the details you provide in your application, to obtain references.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments; and
- Emergency contact details – so we know who to contact in case you have an emergency at work.

How long is the information retained for?

Your personal data will only be retained for as long as is reasonably necessary. What this means in practice will vary as between different types of information, and when we consider our approach we take into account any ongoing need for the information, as well as our legal obligations for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations.

All employee personal information will be deleted at the end of the reasonably necessary period. You have the right to make a complaint to the ICO and to seek to enforce this right through a judicial remedy. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign. Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign. Equal opportunities information is retained in an anonymised format.

How we make decisions about recruitment?

Final recruitment decisions are made the manager and others who may be involved in the recruitment panel. All of the information gathered during the application process is taken into account. You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing info@abwa.org.uk.

Secondments

From time to time we may also offer opportunities for people to come and work with us on a secondment basis. We might ask you to provide information about your skills and experience or invite you to an interview. We might also ask you to complete our pre-employment checks or to obtain a PVG – both of which are described in this Notice above. Whether you need to do this will depend on the type of work you will be doing for us. We may also ask for bank details, personal contact information, emergency contact information or other information to enable us to fulfil our legal obligations.

Your personal data will only be retained for as long as is reasonably necessary. What this means in practice will vary as between different types of information, and when we consider our approach we take into account any ongoing need for the information, as well as our legal obligations for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations.

All employee personal information will be deleted at the end of the reasonably necessary period. You have the right to make a complaint to the ICO and to seek to seek to enforce this right through a judicial remedy.

Your rights

You have certain rights in relation to the personal data which we process about you:

- You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights; this is why we are providing you with this privacy notice
- You can request to access your personal data.
- Where we hold data that is inaccurate, you can ask us to complete or rectify this.
- You have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
- You can object to us processing your personal information in certain circumstances, including where we are using it for the purpose of ABWA's legitimate business interests as set out above; - You also have the right to complain – please see below.

Complaints or queries

ABWA tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. Employees can raise any concerns informally through their line manager or formally by raising a grievance. Job applicants, secondees and volunteers can raise concerns or ask questions using the contact details below. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of ABWA's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below. If you are unhappy with our response, you can complain to the ICO in their capacity as the statutory body which oversees data protection law – www.ICO.org.uk/concerns.

Access to personal information

ABWA tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request'. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to the ABWA for any personal information we may hold you need to put the request in writing addressing it to The Manager; info@abwa.org.uk

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need in a meeting.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting The Manager.

Disclosure of personal information to third parties

We share personal data in the form of name, address, bank details and tax/NI/sickness absence/family leave with our payroll administrators at SCVO. We have an information sharing agreement with them. We may also share your personal data with:

- our professional advisers, such as our accounting and legal advisers, where they require that information in order to provide advice to the Company;
- our pension providers, for the purposes of administering your pension and complying with our legal obligations;
- HM Revenue & Customs and any other regulatory authority we may be subject to for the purpose of demonstrating compliance with applicable law and regulations; and
- such third parties as we reasonably consider necessary in order to prevent crime, such as the police.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 1 June 2018.

How to contact us

If you have any questions or concerns about any information in this privacy notice, you should contact the manager: Fran Previdi, via email fran@abwa.org.uk