



**Children and Young People's Commissioner Scotland
Privacy Notice for prospective, current and former
staff**

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1 Introduction

This is the Privacy Notice for prospective, current and former staff of the Children and Young People's Commissioner for Scotland (the Commissioner's Office).

This notice explains how we will collect and use your personal information, including how long we keep it for, your rights, who we may share it with, and how you can contact us.

As an employer the Commissioner's Office must meet its contractual, statutory and administrative obligations. We are committed to ensuring that the personal data of our employees is handled in accordance with the principles set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The Commissioner's Office is the data controller, responsible for deciding how we hold and use your personal information during and after your working relationship with us in accordance with the UK GDPR.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2 Who does this notice apply to?

This notice applies to all current, prospective and former employees of the Children and Young People's Commissioner for Scotland. It also applies to agency staff, contractors, secondees, volunteers and student placements (together referred to as 'Employees' or 'You').

This notice does not form part of any contract to provide services. We may amend this notice at any time.

3 Data protection queries and further information

If you have any questions about this privacy notice or how we handle your personal information, please contact the Head of Corporate Services.

Contact details are:

Children and Young People's Commissioner Scotland
Bridgeside House
99 McDonald Road
Edinburgh, EH7 4NS

Email: info@cypcs.org.uk

Telephone: 0131 346 5350

4 Your personal information

In this privacy notice, 'your personal information' means your personal data, in other words, information about you from which you can be identified. The appendix to this notice lists 'your personal information' that we may process.

Your 'personal information' does not include data where the identity has been removed, thereby anonymising it.

It is important that your personal information is accurate and up to date. Please keep us informed if your personal information changes during your employment, contract or placement with us.

5 Where does your personal information come from?

Your personal information will come from you or us, and may also come from the following sources:

- Recruitment through direct application or via agencies may provide us with the following personal information; name, date of birth, home address, national insurance number, bank details, email address, contact telephone number, qualifications, previous employment history, skills and experience, interests, next of kin/ emergency contact details, disability.
- Former employers, whom you have given us permission to contact, may provide us with the following personal information; employment references, employment history, absence history.
- Medical professionals may provide us with the following personal information; Occupational Health reports, health data relating to disability, medication, treatment and required adjustments.
- Equalities and diversity monitoring may provide us with the following information: gender, age, gender reassignment, nationality, ethnicity, sexual orientation, disability, religion/ belief, marital status, caring responsibilities.
- Professional Bodies may provide us with the following personal information if relevant to your post; name, address, date of birth, gender, details of relevant qualification, CPD records, membership number, date of qualification and renewal details, membership status, professional qualification provider.
- Pension providers may provide us with the following personal information; personal details in relation to widows, children and other dependents; this will include name, date of birth, address, national insurance number, bank details.
- Trade unions may provide us with details of member status for the purpose of membership deductions through payroll.
- Courts may provide us with personal details in relation to arrestment of earnings, personal information includes name, home address and nature of debt i.e. council tax.

- Other members of staff, clients, contractors, or customers may provide us with the following personal information; flexible working provisions, discipline actions, grievance actions.

As outlined above, we may also collect, store and use the following 'special categories' of more sensitive personal information about:

- your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- your physical or mental health, including any medical condition, health and sickness records and any assessments about your fitness to work; and
- criminal convictions and offences.

If you would like more information on the source of your personal information, please contact the Head of Corporate Services.

6 Processing your personal information

We may process your personal information during and after your employment, contract or placement with us. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

6.1 Information related to your employment

We process the following information to carry out the contract we have with you, provide you access to business services required for your role and manage our human resources processes.

- Decide about your recruitment or appointment;
- Determine the terms on which you work for us and advise you of these;
- Check you are legally entitled to work in the UK;
- Contact you;
- Administer our contract with you and ensure compliance with the terms of your contract;
- Maintain records of your working time, holidays, and working time opt-out agreements;
- Make decisions about salary;
- Make decisions about continued employment or engagement;
- Make arrangements for the termination of our working relationship;
- Provide a reference regarding you;
- Make administrative arrangements for travel and accommodation for business purposes (including details of dietary requirements);
- Carry out business management and planning, including accounting and auditing;
- Understand employee attrition rates;

- Promote our role and function to children, young people and other stakeholders.

6.2 Information related to your salary and pensions

We process the following information for the payment of your salary, pension and other employment related benefits. We also process it for the administration of statutory and contractual leave entitlements such as holiday or maternity leave.

- Provide and process payments and benefits to you (including complying with pension auto-enrolment obligations, liaising with your pension provider and determining pension eligibility) and, if applicable, deduct tax and national insurance and any arrestment of earnings order;
- Assess entitlement to certain benefits such as Childcare vouchers.
- Process deductions from pay in relation to union membership;
- Manage flexible working applications;
- Manage requests for time off work (including but not limited to time off for antenatal appointments; maternity, paternity, adoption, parental and / or shared parental leave; time off for dependents; trade union duties, bereavement; and / or jury service).

6.3 Information related to your performance and training

We use this information to assess your performance and to deal with any employer-employee related disputes. We also use it to meet the training and development needs required for your role.

- Manage performance and conduct;
- Conduct disciplinary and grievance proceedings;
- Assess qualifications and suitability for a job or task, including promotion decisions;
- Carry out education, training and development including coaching and mentoring services.

6.4 Information relating to monitoring

We use this information to assess your compliance with corporate policies and procedures and to ensure the security of our premises, IT systems and employees.

- Monitor your use of our IT and communications systems.

6.5 Information relating to your health and wellbeing and other special category data

We use the following information to comply with our legal obligations and for equal opportunities monitoring. We also use it to ensure the health, safety and wellbeing of our employees.

- Manage sickness absence; assess your fitness to work; and consider disability status and reasonable adjustments for disabled workers;
- Provide adjustments to someone with a disability in line with our legal obligations under the Equality Act (2010);
- Comply with gender pay gap and diversity monitoring reporting legal obligations;
- Carry out equal opportunities monitoring recruitment to comply with our legal obligations;
- Ensure a safe work environment;
- Comply with health and safety obligations;
- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency);
- Inform your contacts in the event of sickness, accident or other emergency.

The appendix to this notice provides more information on our reasons and legal grounds for processing your personal information.

7 Lawful basis for processing your personal data

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the UK GDPR.

7.1 Article 6(1)(b) - processing necessary for the performance of a contract

The appendix sets out your personal information that is necessary for us to enter into or carry out our contract with you. If you do not provide this data, we may not be able to enter into, or carry out, the contract. For example, if you do not provide your bank details, we may not be able to pay you.

7.2 Article 6(1)(c) – so we can comply with our legal obligations as your employer

In some circumstances, the provision of your personal information is a statutory requirement. This includes:

- Documentation confirming your right to work in the UK – if you do not provide this, we may not be able to enter into a contract with you, or we may need to terminate your contract.
- Statutory information you must provide to us if you wish to take maternity, paternity, adoption, shared parental or parental leave, or claim statutory

payments in relation to such leave. If you do not provide this, we may not be able to comply with our legal obligations and / or provide relevant benefits to you.

- Protecting Vulnerable Groups (PVG) scheme membership for regulated work with children. If you do not provide this, we may not be able to enter into a contract with you, or we may need to terminate your contract.

7.3 Article 6(1)(d) – in order to protect your vital interests or those of another person

This is likely to be particularly relevant when we need to use your personal information for emergency medical care, and you are unconscious or otherwise incapable of giving consent to the processing. For example, if you experienced a severe, life-threatening allergic reaction at work and had fallen unconscious, we would need to call for an ambulance and provide details of your health information to the ambulance crew.

7.4 Article 6(1)(f) – for the purposes of our legitimate interests

The appendix sets out what our legitimate interests are. They primarily concern business management, workforce planning, ensuring a suitable workforce and ensuring compliance with our policies and procedures.

7.5 Change of purpose

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 purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8 Lawful basis for processing special category and criminal data

‘Special categories of personal information’ means personal data revealing:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purposes of uniquely identifying a person;
- Data concerning health;
- Data concerning a person’s sex life or sexual orientation; and
- Criminal convictions and offences.

Our additional legal grounds for processing special categories of personal information are fully set out in the appendix.

In summary, we rely on the following, under the UK GDPR:

- Article 9(2)(b) – which relates to carrying out our obligations and exercising our rights in employment.
- Article 9(2)(c) - to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(g) - where processing is necessary for reasons of substantial public interest.

In addition, we rely on the following processing conditions under Schedule 1 of the Data Protection Act 2018:

- Para 1 – relates to processing special category data for employment purposes.
- Para 6 – relates to processing criminal offence data for statutory purposes.
- Para 8 – relates to processing of special category data for equality of opportunity or treatment of groups of people.

8.1 Explicit consent – Article 9(2)(a)

As outlined above and detailed in appendix 1 we use special categories of your personal information in accordance with the purposes, reasons and legal conditions referred to in this notice. Rarely do we ask for your explicit consent as our legal basis for processing your special category data.

However, in those limited circumstances where we do ask for your explicit consent, we will first provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

8.2 Criminal offence data

Personal data relating to criminal convictions and offences may be collected as part of the recruitment process or we may be notified of such information directly by you or a third party, such as the Police or Disclosure Scotland, in the course of your work for us.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Appendix 1 contains further information on this.

Our legal basis for processing your personal information in this way is where it is necessary:

- to carry out our legal obligations;

- for the purposes of preventing or detecting unlawful acts;
- to protect the public against dishonesty;
- to prevent fraud;
- to safeguard children and individuals at risk;
- to safeguard the economic well-being of certain individuals;
- to protect individuals' vital interests;
- to process information in the public domain;
- to process information for the purposes of or in connection with legal claims or prospective legal claims;
- in the public interest or is of substantial public interest.

We have in place an appropriate policy and safeguards when processing such data.

9 Sharing your personal information with third parties

We may have to share your data with third parties, including third-party service providers and other government or quasi-government bodies. In doing so, we require third parties to respect the security of your data and to treat it in accordance with the law.

We may share your personal information with the following third parties:

- if this is required by law;
- necessary to enter or carry out our contract with you or administer the working relationship with you;
- where we have another legitimate interest in doing so; or
- where it is necessary to protect your vital interests or those of another person.

List of third parties (non-exhaustive):

- His Majesty's Revenue and Customs (HMRC);
- MyCSP
- Banks/ Building societies
- Health and Safety Executive (HSE);
- Training providers; including accrediting bodies/ qualifications, external facilitators, coaches and mentors;
- Health professionals and occupational health providers involved in your care;
- Auditors (internal and external);
- Our professional advisors;
- Our service providers, including IT service providers; recruitment testing providers; payroll and pension administrators; and those involved in providing benefits in connection with your employment;
- The public: contact in relation to business work, we may share details of your name, work location, work email address, work contact number;

- Any person specified by you, where you ask us to provide a reference to that person; and
- Other third parties as necessary to comply with the law (e.g., disclosures in response to information requests).

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

10 Automated decision-making

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which has a legal or similarly significant effect on you.

11 Transferring your personal information outside the UK

When it is necessary to transfer the personal information we collect about you outside of the UK, we ensure that we comply with the UK GDPR, ensuring there is an adequate level of data protection and appropriate safeguards are in place. If adequate protection or appropriate safeguards are not in place, we will only transfer your personal information where we have your explicit consent to do so.

12 Retention of personal information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting or reporting requirements. Once personal information is no longer needed it is securely destroyed. Most of the information we hold about current and former staff is held for 6 years after the end of employment.

The appendix provides further information about how long we hold your personal data for.

13 Your rights

You have several legal rights relating to your personal data.

13.1 Your right of access

You can request a copy of your personal information that we hold, and check whether we are processing it lawfully.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights), unless your request for access is manifestly unfounded or excessive.

In these circumstances we may charge a reasonable fee for the administrative costs of complying with your request or refuse to comply with the request.

13.2 Your right to get your data corrected

You can ask us to correct your personal information if you don't think it is accurate, complete or up to date.

13.3 Your right to get your data deleted

You can ask us to delete your personal information, if:

- It is no longer necessary for the purposes for which we obtained it;
- You withdraw your consent, and we have no other legal basis for the processing, so if, for example, the processing is necessary for us to perform tasks in the public interest, or to exercise or defend legal claims, we will not be required to delete your data;
- You validly object to the processing as described below;
- We have unlawfully processed the data; or
- We must delete the data to comply with a legal obligation.

13.4 Your right to object to the use of your data

If we process your personal information to perform tasks carried out in the public interest or based on legitimate interests (as set out in the appendix), you can object to this processing because of your situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims. You may also object if we process your personal information for direct marketing purposes.

13.5 Your right to restrict how we use your data

You can ask us to restrict our processing of your personal information if:

- You contest the accuracy of the data (for a period that enables us to check it);
- Our processing is unlawful, but you don't want the data deleted;
- We no longer need the data, but you require it to establish, exercise or defend legal claims; or
- You have objected (as above) and are awaiting confirmation as to whether we have overriding legitimate grounds for processing.

13.6 Your right to data portability

If our processing is based on your consent or necessary to carry out our contract with you, and is carried out by automated means, you can request a copy of the personal information you have provided to us and the transfer of this to someone else. Where technically feasible, you can ask us to transfer it directly.

However, whether you will be able to exercise your rights may depend on the purpose for which the data controller is processing the data and the legal basis upon which the processing takes place. For example:

- The rights allowing for deletion or erasure of personal data (sometimes called the right to be forgotten) and data portability do not apply in cases where personal data is processed for the purposes of the performance of a task carried out in the public interest.
- The right to object to the processing of personal data for the purposes of a public interest task is restricted if there are legitimate grounds for the processing which override the interest of the data subject.
- The rights allowing for erasure, data portability and the right to object do not apply where personal data is processed in respect of a legal obligation.
- Finally, the right to object to processing does not apply where processing is carried out in the performance of a contract. This would be considered on a case-by-case basis and depends on what personal data is involved and the risks further processing of that data would pose to you.

14 Complaints

We aim to resolve all complaints about how we handle your personal information internally via our Head of Corporate Services.

We also have a Data Protection Officer, the Head of Information Governance for the Scottish Parliament. You can speak to them if you have concerns about how your personal information has been used by us, or if you want to know more about your rights in relation to data protection. You can contact the Head of Information Governance on 0131 348 5281 or email dataprotection@parliament.scot

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO). The Information Commissioner is the UK supervisory authority for data protection issues. You can call their helpline on 0303 123 1111 or visit their website at <https://ico.org.uk/make-a-complaint>

Our [Data Protection Policy](#) has more information on these rights and explains how you can exercise them.

Appendix 1: Your personal information

This table provides more details about the types of personal information we collect and hold about you as an 'employee', what we use it for, the relevant legal basis under data protection law for doing so, and how long we keep it for.

Data marked with a * in the table is special category data or might disclose this type of information.

We must have additional legal grounds for processing special categories of personal information – these are listed in the second column of the table.

Table 1: Employees personal information

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information related to your employment (unsuccessful candidate) Decide about your recruitment or appointment.	For our legitimate interests: <ul style="list-style-type: none"> to select suitable employees, workers and contractors 	<ul style="list-style-type: none"> Contact details Your application form, CV and interview notes References and details of previous employers 	6 months after the appointment of successful candidate
Information related to your employment (successful candidate) Decide about your recruitment or appointment.	To enter or carry out the contract To comply with a legal obligation For our legitimate interests:	<ul style="list-style-type: none"> Contact details Your application form, CV and interview notes References and details of previous employers 	6 years after end of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Determine the terms on which you work for us and advise you of these.	<ul style="list-style-type: none"> to select suitable employees, workers and contractors <p>*For special categories of information:</p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations To review equality of opportunity or treatment 	<ul style="list-style-type: none"> Professional memberships and qualifications Offer letter, contract of employment Working time opt-out agreements Work location Start date Disability* 	
<p>Information related to your employment</p> <p>Check you are legally entitled to work in the UK.</p>	<p>To enter or carry out the contract</p> <p>To comply with a legal obligation</p>	<ul style="list-style-type: none"> Documentation confirming your right to work in the UK (may include passport, national identity card) 	2 years after end of employment
<p>Information related to your employment</p>	<p>To enter or carry out the contract</p>	<ul style="list-style-type: none"> PVG Scheme membership details 	6 years after end of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
<p>Assess whether you are suitable to carry out your appointment (including checking your PVG scheme record to make sure you are not barred from regulated work with children or vulnerable adults).</p> <p>Assess whether you pose a threat to the health, safety, security or confidentiality of the Office, our employees, contractors and workers, our young people or any third person.</p> <p>Prevent crime including fraud</p> <p>Ensure our safety and the safety, security or confidentiality of our employees, workers, contractors, young people and other third parties.</p>	<p>To comply with a legal obligation</p> <p>*For special categories of information:</p> <ul style="list-style-type: none"> • To safeguard children and individuals at risk • Prevent fraud • Preventing or detecting unlawful acts • Protect individuals' vital interests 	<ul style="list-style-type: none"> • Unspent convictions* • Certain spent convictions* • Cautions* • Court orders and notification requirements* • Other relevant information 	<p>TO ADD</p>

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information related to your employment To provide a reference regarding you	To comply with a legal obligation	<ul style="list-style-type: none"> • Name • Dates of employment • Job title • Reason for leaving 	1 year after providing
Information related to your employment For promotion of our role and functions	For our legitimate interests: <ul style="list-style-type: none"> • Raising awareness of our functions 	<ul style="list-style-type: none"> • Your name • Work location • Work email address • Work contact telephone number 	End of employment
Information related to your employment To understand employee attrition rates	For our legitimate interests: <ul style="list-style-type: none"> • Business management • Workforce planning • Ensure a suitable workforce 	<ul style="list-style-type: none"> • Your name • Work location • Offer letter, contract of employment • Start date • Details of job titles and duties, work history • Information from exit interviews 	6 years after end of employment
Information relating to your employment	To carry out the contract To comply with a legal obligation	<ul style="list-style-type: none"> • Your name • Working time opt-out agreements 	6 years after end of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Maintain records of your working time, holidays, and working time opt-out agreements.	For our legitimate interests: <ul style="list-style-type: none"> • Business management • Workforce planning 	<ul style="list-style-type: none"> • Hours worked 	3 years after the end of tax year
		<ul style="list-style-type: none"> • Holiday records 	6 years after end of tax year
Information relating to your employment Make administrative arrangements for travel and accommodation for business purposes. Collect and maintain records of any additional support needs and dietary requirements	To carry out the contract For our legitimate interests: <ul style="list-style-type: none"> • Collect and retain information relating to staff additional support needs and dietary requirements for administrative arrangements in connection with booking meetings, training events and travel. For special categories of information: <ul style="list-style-type: none"> • Explicit consent 	<ul style="list-style-type: none"> • Your name • Contact details • Passport information • Dietary requirements* • Additional support needs* 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
<p>Information related to your employment, salary and pensions</p> <p>Contact you</p> <p>Contact you in an emergency, including to evoke business continuity procedures</p> <p>Administer our contract with you</p> <p>Ensure compliance with the terms of your contract</p> <p>Manage flexible working applications</p> <p>Provide and process payments and benefits to you (including complying with pension auto-enrolment obligations, liaising with your pension provider and determining pension eligibility)</p> <p>If applicable, deduct tax and national insurance</p>	<p>To enter or carry out the contract</p> <p>To comply with a legal obligation</p> <ul style="list-style-type: none"> For the purposes of processing voluntary benefit payments such as childcare vouchers consent will be required <p>*For special categories of information:</p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations To review equality of opportunity or treatment 	<ul style="list-style-type: none"> Contact details Work location Offer letter and contract of employment Start date Bank account details Information and correspondence regarding flexible working applications Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependents* Age and date of birth Marriage or civil partnership status* Dependents* 	6 years after end of employment
		<ul style="list-style-type: none"> Tax and national insurance details, including national insurance number 	3 years after end of financial year

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
		<ul style="list-style-type: none"> • Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details • Absence records (excluding data disclosing sickness and health information) • Health data and sickness records, including disability information* • Holiday records 	6 years after end of tax year
		<ul style="list-style-type: none"> • Hours worked 	3 years after the end of tax year

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information related to your salary and pensions Manage requests for time off work, including but not limited to time off for: <ul style="list-style-type: none"> • Antenatal appointments. • Maternity, paternity, adoption, parental and / or shared parental leave • Time off for dependents • Trade union duties • Bereavement • Jury service • Emergency leave / Carer's leave 	To carry out the contract To comply with a legal obligation For our legitimate interests: <ul style="list-style-type: none"> • Business management • Workforce planning • Ensure compliance with our policies and procedures *For special categories of information: <ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> • Contact details • Start date • Offer letter and contract of employment • Work location • Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependents* • Dependents* • Trade union membership* 	6 years after end of employment
		<ul style="list-style-type: none"> • Absence records 	6 years after end of tax year

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
<p>Information related to your employment, performance and training</p> <p>Business management and planning, including accounting or auditing</p> <p>Manage performance and conduct</p> <p>Make decisions about salary and compensation</p> <p>Conduct disciplinary and grievance proceedings</p> <p>Assess qualifications and suitability for a job or task, including promotion decisions</p> <p>Make decisions about continued employment or engagement</p> <p>Make arrangements for the termination of our working relationship</p>	<p>To carry out the contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • Business management • Workforce planning • Ensure a suitable workforce • Ensure compliance with our policies and procedures <p>*For special categories of information:</p> <ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations • To review equality of opportunity or treatment 	<ul style="list-style-type: none"> • Contact details • Age and date of birth • Work location • Offer letter and contract of employment • Start date • Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependents* • Details of job titles and duties, work history. • Performance and appraisal records • Performance management • Professional memberships and qualifications • Training records • Information and correspondence regarding flexible working applications 	<p>6 years after end of employment</p>

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
		<ul style="list-style-type: none"> • Information and correspondence relating to disciplinary and grievance investigations and proceedings • Redundancy information, consultation notes, correspondence • Marriage or civil partnership status* • Gender • Trade union membership* 	
		<ul style="list-style-type: none"> • Payroll and wage records, compensation history, salary and benefits details, including pension. • Absence records • Holiday records 	6 years after end of tax year
		<ul style="list-style-type: none"> • Information about your use of our information and communications systems, and emails passing through our systems (more detail on this can be found in our IT policy) 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information related to your performance and training Carry out education, training and development	To carry out the contract For our legitimate interests: <ul style="list-style-type: none"> • Business management • Workforce planning • Ensure a suitable workforce • Ensure compliance with our policies and procedures 	<ul style="list-style-type: none"> • Contact details • Work location • Start date • Details of job titles and duties, work history, performance and appraisal records • Professional memberships and qualifications • Training records 	6 years after end of employment
		<ul style="list-style-type: none"> • Absence records 	6 years after end of tax year
Information relating to monitoring Monitor your use of our IT and communications systems	For our legitimate interests: <ul style="list-style-type: none"> • Ensure compliance with our policies and procedures • Protect our business information • Ensure compliance with our confidentiality obligations to clients • Ensure network and information security, including checking for viruses, preventing 	<ul style="list-style-type: none"> • Name • Work location • Information about your use of our information and communication systems, and emails passing through our systems (more detail on this can be found in our Acceptable use of IT policy) • Correspondence to and from you (electronic or otherwise) and telephone voicemail 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
	<p>unauthorised access to our information and communication systems, preventing malicious software distribution, or to find or retrieve lost messages</p> <ul style="list-style-type: none"> • Service the needs of customers and clients 	<p>messages during times when you are absent from the workplace (more detail on this is in our Acceptable use of IT policy)</p>	
<p>Information relating to your health and wellbeing and other special category data</p> <p>Manage sickness absence</p> <p>Assess your fitness to work</p> <p>Consider disability status and reasonable adjustments for disabled workers</p>	<p>To carry out the contract</p> <p>To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • Business management • Workforce planning • Ensure a suitable workforce • Ensure compliance with our policies and procedures <p>*For special categories of information:</p>	<ul style="list-style-type: none"> • Contact details • Work location • Start date • Offer letter and contract of employment • Health data and sickness records, including disability information* • Information and correspondence regarding pregnancy, birth and maternity leave* • Information and correspondence regarding breastfeeding* 	<p>6 years after end of employment</p>

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
	<ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations • For the purposes of preventive or occupational medicine, or for the assessment of your working capacity • To review equality of opportunity or treatment 	<ul style="list-style-type: none"> • Information and correspondence relating to disciplinary and grievance investigations and proceedings • Information confirming you have read and understood our policies and procedures • Details of job titles and duties, work history, performance and appraisal records 	
		<ul style="list-style-type: none"> • Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details • Absence records • Holiday records 	6 years after end of tax year
		<ul style="list-style-type: none"> • Hours worked 	3 years after the end of tax year

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information relating to your health and wellbeing and other special category data	To comply with a legal obligation *For special categories of information: <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependents* 	6 years after end of employment
		<ul style="list-style-type: none"> Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details Absence records 	6 years after end of tax year
		<ul style="list-style-type: none"> Hours worked 	3 years after the end of tax year
Information relating to your health and wellbeing and other special category data	To comply with a legal obligation *For special categories of information: <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> Protected groups you belong to*: race, disability, gender, age, sexual orientation, religion or belief, gender reassignment, maternity and pregnancy. 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
		<ul style="list-style-type: none"> Information submitted in response to staff survey 	12 months after survey closes
		Information on paternity leave, shared parental leave, maternity leave and caring responsibilities*	6 years after end of employment
Information relating to your health and wellbeing and other special category data Adjustments for someone with a disability	To comply with a legal obligation and provide equal access to employment *For special categories of information: <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> Disability* Health information* 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Information relating to your health and wellbeing and other special category data Carry out equality monitoring	To comply with a legal obligation and provide equal access to employment *For special categories of information: <ul style="list-style-type: none"> • To review equality of opportunity or treatment • To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> • Health data, including disability information* • Information regarding pregnancy and maternity* • Age and date of birth • Marriage or civil partnership status* • Gender • Information on gender reassignment* • Data revealing ethnicity, nationality, sexual orientation, or religious beliefs* 	5 years after end of calendar year
Information relating to your health and wellbeing and other special category data	To comply with a legal obligation *For special categories of information:	<ul style="list-style-type: none"> • Accident records • Health data and sickness records, including disability information* 	3 years after date of entry

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Comply with health and safety obligations	<ul style="list-style-type: none"> To exercise or perform employment law rights or obligations For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	<ul style="list-style-type: none"> Training records Information regarding pregnancy and maternity* Information and correspondence regarding breastfeeding* 	6 years after end of employment
		<ul style="list-style-type: none"> Hours worked 	3 years after the end of tax year
Information relating to your health and wellbeing Inform your contacts in the event of sickness, accident or another emergency	For the legitimate interests of the emergency contacts you have notified to us: <ul style="list-style-type: none"> To be informed in the event of sickness, accident or another emergency 	<ul style="list-style-type: none"> Your name Work location Emergency contact details 	End of employment
Information relating to your health and wellbeing and other special category data	To protect your vital interests or those of another person	<ul style="list-style-type: none"> Contact details Work location Emergency contact details 	End of employment

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information	Retention period
Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency)	<p>*For special categories of information:</p> <ul style="list-style-type: none"> To protect the vital interests of you or another person, if you are incapable of giving consent. 	<ul style="list-style-type: none"> Accident records Health data and sickness records, including disability information* 	3 years after date of entry

Appendix 2: Document control sheet

Document Information				
Document name		Human resources privacy notice Final V1.0		
Record Management No.				
Type		Policy and Procedures		
Prepared by		Information Officer		
Date		May 2025		
Approval				
Approved by		Head of Corporate Services		
Approval Date		21/05/2025		
For publication (Y/N)		N		
Review				
Responsible Manager		Nicola Vallance-Ross		
Date of next review		Only if change in operations.		
Publication				
Date published		N/A		
Date guide to information updated		N/A		
Associated Documents				
Document name(s)		Data protection policy		
Record Management No.		N/A		
Summary of changes to document				
Date	Action by (initials)	Version updated (e.g. v1)	New version no. (e.g. v2)	Brief description (e.g. updated section 1, corrected typos, reformatted)