This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a ‘privacy notice’) and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

**Who collects the information**

*ABWA* (the ‘Organisation’) is a ‘data controller’ and gathers and uses certain information about you. Where the Organisation is also a ‘data processor’, we will process information received from third parties about you.

**Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

**About the information we collect and hold**

The table set out on the following pages summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out below with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our organisation or on a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators and/or our funders as is necessary or required to comply with the law. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

**Where information may be held**

Information may be held at our offices and third-party agencies, service providers, representatives and agents. Information may be transferred internationally including to countries that do not have data protection laws equivalent to those in the UK. We have security measure in place to seek to ensure that there is appropriate security for information we hold.

**How long we keep your information**

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this can be found in our Retention Policy.

**Your rights to correct and access your information and to ask for it to be erased**

Please contact *ABWA via e-mail* *–*info@abwa.org.uk *or by phone on 01369 706636* if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask *ABWA* for some but not all of the information we hold and process to be erased (the ‘right to be forgotten’) in certain circumstances. Wewill provide you with further information about the right to be forgotten, if you ask for it.

**Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**How to complain**

We hope that *ABWA* can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

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| **Schedule relating to the information we collect and hold** |
| **The information we collect** | **How we collect the information** | **Why we collect the information** | **How we use and may share the information** |
| **Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)**  | From you | To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice | To enter into/perform the employment contract |
| **Details of salary and benefits, bank/building society, National Insurance and tax information, your age**  | From you | To perform the employment contract including payment of salary and benefitsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice | To ensure you receive the correct pay and benefitsInformation shared with our payroll administrators *Sage Payroll (back up date also held by IT Works)* and with HM Revenue & Customs (HMRC) |
| **Details of your spouse/partner and any dependants**  | From you | To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension | To ensure you receive the correct pay and benefitsInformation shared with our payroll administrators *Sage Payroll* (back up date also held by IT Works) and with HM Revenue & Customs (HMRC) |
| **Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information**  | From you and, where necessary, the Home Office | To enter into/perform the employment contractTo comply with our legal obligationsLegitimate interest: to maintain employment records | To carry out right to work checksInformation may be shared with the Home Office |
| **Relevant identification such as birth certificate, passport, driving licence, utility bills.** | From you | To perform the employment contractTo comply with our legal obligations and appropriate PVG scheme obligationsTo comply with the terms of our insurance | To ensure that you have a clean driving licenceAssess suitability to work with children and vulnerable adults |
| **Details of your pension arrangements, and all information included in these and necessary to implement and administer them**  | From you, from our pension administrators *Fife Council* and (where necessary) from your own pension fund administrators | To perform the employment contract including employment-related benefitsTo comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice | To administer your pension benefits and/or To comply with our auto-enrolment pension obligationsInformation shared with our pension administrators *Fife Council* and with HMRC |
| **Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health)**  | From you, from your doctors, from medical and occupational health professionals we engage where applicable | To perform the employment contract including employment-related benefitsTo comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices | To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefitsTo comply with our legal obligations to you as your employerInformation shared with your doctors, with medical and occupational health professionals and withFor further information, see **\*** below |
| **Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs** | From you | To comply with our legal obligations and for reasons of substantial public interest [(equality of opportunity or treatment) | To comply with our equal opportunities monitoring obligations and to follow our policiesFor further information, see **\*** below |
| **Criminal records information, including the results of Disclosure Scotland and Disclosure and Barring Service (DBS) checks**  | From you, Disclosure Scotland and the DBS | To perform the employment contractTo comply with our legal obligationsFor reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty) | To carry out statutory checksInformation shared with Disclosure Scotland, DBS and other regulatory authorities as requiredFor further information, see **\*** below |
| **Information on grievances raised by or involving you** | From you, from other employees and from consultants we may engage in relation to the grievance procedure | To perform the employment contractTo comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice | For staff administration, to follow our policies and to deal with grievance mattersInformation shared with relevant managers, HR personnel and with consultants we may engage from time to time  |
| **Information on conduct issues involving you** | From you, from other employees and from consultants we may engage in relation to the conduct procedure | To comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices | For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance mattersInformation shared with relevant managers, HR personnel and with consultants we may engage from time to time  |
| **Details of your appraisals and performance reviews** | From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process | To comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices | For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance mattersInformation shared with relevant managers, HR personnel and with consultants we may engage from time to time  |
| **Details of your performance management/improvement plans (if any)** | From you, from other employees and from consultants we may engage in relation to the performance review process | To comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices | For staff administration and assessments, to follow our policies and to monitor staff performanceInformation shared with relevant managers, HR personnel and with consultants we may engage from time to time  |
| **Details of your time and attendance records** | From you using daily timesheets, and information on time and attendance recorded on OASIS (Cloud Based Management System)  | To perform the employment contractLegitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences | For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendanceInformation shared with relevant managers, HR personnel, with consultants we may engage and with our payroll administrators *Sage Payroll*  |
| **Information in applications you make for other positions within our organisation** | From you | To enter into/perform the employment contractTo comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice | To process the applicationInformation shared with relevant managers, HR personnel and with consultants we may engage from time to time  |
| **Information about your use of our IT, communication and other systems** | Automated monitoring of our websites and other technical systems, such as our computer networks and connections, access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records   | Legitimate interests:to monitor and manage staff access to our systems and facilitiesto protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakageto ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality controlto ensure that commercially sensitive information is kept confidentialto check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied withfor security vetting and investigating complaints and allegations of criminal offencesfor statistical analysisto prevent unauthorised access and modifications to our systemsas part of investigations by regulatory bodies, or in connection with legal proceedings or requests | To protect and carry out our legitimate interests (see adjacent column)Information shared with relevant managers, HR personnel [and with consultants we may engage from time to time For further information, see **\*\*** below |
| **Details of your use of business-related social media, such as LinkedIn** | From relevant websites and applications | Legitimate interests:to monitor and manage staff access to our systems and facilitiesto protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakageto ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality controlto ensure that commercially sensitive information is kept confidentialto check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied withfor security vetting and investigating complaints and allegations of criminal offencesas part of investigations by regulatory bodies, or in connection with legal proceedings or requests | To protect and carry out our legitimate interests (see adjacent column)Information shared with relevant managers, HR personnel [and with consultants we may engage from time to time For further information, see **\*\*** below |
| **Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)** | From relevant websites and applications | Legitimate interests:to monitor and manage staff access to our systems and facilitiesto protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakageto ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality controlto ensure that commercially sensitive information is kept confidentialto check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied withfor security vetting and investigating complaints and allegations of criminal offencesas part of investigations by regulatory bodies, or in connection with legal proceedings or requests | To protect and carry out our legitimate interests (see adjacent column)Information shared with relevant managers, HR personnel [and with consultants we may engage from time to For further information, see **\*\*** below |
| **Details in references about you that we give to others** | From your personnel records, our other employees | To perform the employment contractTo comply with our legal obligationsLegitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice | To provide you with the relevant referenceTo comply with legal/regulatory obligationsInformation shared with relevant managers, HR personnel and the recipient(s) of the reference |
| **CCTV Images** | CCTV system in purpose built refuge | Legitimate interestsFor the prevention and detection of crime against service users, staff and the property.To ensure the safety of all residents and staff.  |  |

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked with an asterisk (\*) above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, such as your contractual sick pay and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

**\*** Further details on how we handle sensitive personal information and information relating to any unspent criminal convictions and offences are set out in our *Data Protection Policy*

**\*\*** Further information on the monitoring we undertake in the workplace and how we do this is available in our *IT and Social Media Policies* available on SharePoint or from your Team Leader.