

## Specific Privacy Notice for managing the employment relationship between Glasgow Life and an employee

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### **(controller) who we are:**

Culture and Sport Glasgow is a Scottish charity (No SC037844) incorporated under the Companies Acts and limited by guarantee, registered in Scotland with Company No SC313851 having its registered offices at 38 Albion Street, Glasgow G1 1LH and operating under the name "Glasgow Life" ("CSG"). CSG is registered with the Information Commissioners Officer ("ICO") under Notification No. Z9838695.

Culture and Sport Glasgow (Trading) CIC ("CSG CIC") is a trading subsidiary of CSG. CSG CIC, a community interest company, is registered in Scotland with Company No SC313850 having its registered offices at 38 Albion Street, Glasgow G1 1LH and registered with the ICO under Notification No. Z9838741.

CSG and CSG CIC are collectively referred to by CSG's operating name "Glasgow Life" ("we" or "us") for the purposes of this Specific Privacy Notice. You can contact our data protection officer by post at c/o Data Protection, GCC, City Chambers, George Square, Glasgow G2 1DU, United Kingdom, or by email at: [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk), or by telephone - 0141 287 1055.



### **(purposes) why do we need your personal information and what do we do with it?**

You are giving us your personal information to allow us to effectively manage your employment or prospective employment relationship with Glasgow Life and for us to meet our obligations to you as an employer or prospective employer.

Throughout the lifetime of your employment relationship with Glasgow Life the information you provide will be used for the following purposes:

- Your name, national insurance number and contact details, including your home address, telephone numbers and email addresses will be used to identify you and communicate with you as necessary.
- During the recruitment process or at times during your employment information may be gathered to assess your suitability to perform specific roles such as PVG and disclosure checks. In addition, information will be gathered to check eligibility to work in the United Kingdom.

- Information in relation to employment history, qualifications, training certification and licences (such as a driving licence) may be required in order to validate that you are appropriately qualified to undertake the activities of your role (or prospective role) and to ensure calculation of allowances or statutory payments for which you are entitled.
- Personal banking details are required in order to process all payments due to you in respect of your employment with Glasgow Life.
- Qualification for particular categories of leave; maternity, adoption, shared parental and paternity support leave may require you to provide additional information such as dates of confinement, to ensure that you meet the appropriate qualifying criteria and receive appropriate leave and payments.
- Information in respect of your health may be gathered at different times via statutory health surveillance programmes, statutory health assessments or as a result of our recruitment or attendance management arrangements. This information is captured to ensure that we comply with our statutory responsibilities, support employee's health and wellbeing and manage attendance across the organisation.
- During your employment, you may be invited to disclose personal characteristic information as defined in the Equality Act 2010 and other equalities related information. This information is used for statistical monitoring of the composition of Glasgow Life's workforce.
- In some circumstances an employee may engage in "case management" processes, such as attendance management, discipline and appeals, grievance or bullying and harassment complaints. In such circumstances, personal information is often disclosed by individuals and recorded in case notes. Such information will be considered as evidence in the case management decision making process. The outcome of such processes will be communicated to you and recorded on file.
- During the course of your employment, use of company equipment and premises may result in the collection of other data.

This includes:

- Dialed telephone numbers, the date, time and duration of incoming and outgoing calls.
- Websites visited, including date, times of visit.
- Emails sent and received, including dates, times, subject, recipient and sender.
- Details of any media files stored on our network
- The use of unencrypted usb devices
- Clock in times when using time recording equipment
- System login times
- Door entry system recordings
- CCTV footage

This information may be used for surveillance purposes, investigating and managing conduct and for data matching exercises.

- Some posts require members of staff to have Disclosure checks or PVG checks made against them. In these cases Glasgow Life will process information regarding criminal convictions (and any police intelligence regarding suspected criminality included in a PVG check) to assess your suitability for the post in question.

Some members of staff may also be service users. We process information on service users (including service users who are members of staff) in accordance with the specific privacy notices published for the various services we provide and staff should consult those service delivery privacy notices for details of this processing.



### **(legal basis) for using your information:**

These services are provided in terms of Glasgow Life's statutory functions as an organisation, more details of which can be found on our website at [www.glasgowlife.org.uk/privacy](http://www.glasgowlife.org.uk/privacy). Processing your personal information is necessary for the performance of a contract with you (or in the case of recruitment, to take steps to enter into a contract with you). If you do not provide us with the information we have asked for then we will not be able to manage our employment relationship with you. Some information needs to be shared with external bodies because the organisation is under a legal obligation to do so.



### **(sharing) who do we share your information with?**

We are legally obliged to safeguard public funds so details will be checked internally for fraud prevention or verification purposes and may be shared with other public bodies for the same purpose. We are legally obliged to share certain data with other public bodies such as HMRC and will do so where the law requires this; we will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and proportionate. Information is also analysed internally in order to provide management information, inform service delivery reform and similar purposes. This is in accordance with the organisations Information Use and Privacy Policy and the Glasgow Life privacy statement set out in full on our website.

In some circumstances there will be a requirement to share some information with organisations external to Glasgow Life:

- Depending upon the nature of your role, relevant information may be shared with relevant registered employment bodies.

- Information gathered in respect of accidents at work may be gathered and may be shared with the HSE as required.
- Where workplace assessment for qualifications is undertaken personal data may be shared with the appropriate qualifications authority for the processing of results and issuing of qualifications.
- Your personal details may be shared with the organisation's insurance provider for the purposes of insurance policies held by the company in respect of Employers Liability Insurance, Indemnification of employees and other insurance purposes as necessary.
- If at any time during or subsequent to your employment you exercise your rights to enter into a dispute via the courts system, including employment tribunal, we may be required to share information in relation to your employment relationship with the courts or legal representatives as required.
- Where an employee is a member of the local government pension scheme, there is a requirement to share information to ensure appropriate contributions are made and benefit calculations can be made.
- The Council also holds information on behalf of, and also acts as a data processor on behalf of Glasgow Life in relation to back office functions such as payroll and other HR services. Information relating to staff disciplinary cases will be shared between the Council and Glasgow Life, where relevant, such as where someone is employed by both the Council and Glasgow Life. Where relevant, information acquired by investigatory sections within Glasgow Life will be shared with the Council and Glasgow Life may also receive similar information from the Council. In these cases, Glasgow Life remains responsible for determining how to use such information, including making decisions on whether to release it. The Council may require to release such information in response to a court order even where it holds it on behalf of Glasgow Life; Glasgow Life will be informed of any such court orders.
- In circumstances, relevant personal data may be shared with third parties in respect of processing payroll deductions made in respect of salary sacrifice contributions, charitable giving arrangements, payments made to satisfy court orders, AVC scheme contributions, trade union subscriptions, credit union contributions.
- If you have ever had an appointment with Glasgow Life's current or previous occupational health provider, you may have an occupational health record. Such records are retained by the current occupational health provider. The contents of your medical records are confidential and are not disclosed to Glasgow Life but will inform any occupational health reports issued to Glasgow Life by the occupational health provider.
- In the event that Glasgow Life change occupational health provider, these medical records will transfer directly to the new provider and will not pass to Glasgow Life.

- The organisation is obliged to participate in the National Fraud Initiative in Scotland and in terms of this passes information on staff (primarily payroll data) to Audit Scotland for data matching to detect fraud or possible fraud. Details of this exercise can be found on Audit Scotland's website at <http://www.audit-scotland.gov.uk/our-work/national-fraud-initiative>.
- Glasgow Life is subject to freedom of information ("FOI") legislation. Often we receive requests which seek disclosure of information about members of staff. Such requests are assessed carefully and we will only release staff information in response to FOI requests if doing so is compatible with our obligations under data protection law. As a general rule we will withhold the identities of staff on grade 8 or below, and release the identities of staff on grade 9 or above, unless there are particular reasons to depart from this approach (such as where staff are involved in areas of work where disclosing their identity could endanger them). We will not voluntarily release non-work-related information about members of staff such as home address, nor will we voluntarily release information where this relates to the member of staff being a service user rather than in their capacity as an employee. We will seek the views of current members of staff as to any such release.
- In circumstance where you agree to engage with our employee assistance provider as a result of a management initiated referral, relevant personal information will be shared with the provider to allow the counselling service to be delivered.
- Some employees may be required, as part of their duties, to attend or speak at council committees or subcommittees. If these meetings are webcast then images of the meeting (including the attendance or contribution of officers attending) will be published on the council's website.



#### **(international transfers):**

Information published on Glasgow Life websites or the Council (including video footage of webcast meetings and committee reports) can be accessed from anywhere in the world.

In the event that you are referred for counselling by management and with your consent to our employee assistance provider, Workplace Options, in certain circumstances your personal data may transfer out with the United Kingdom and the Europe.

In order to deliver a seamless 24 hour service Workplace Options have service centres in following locations; London, Dublin, Lisbon, Lille, Ghent, Brussels, Raleigh, Toronto, Jakarta, Dubai, Bangalore, Singapore and Shanghai.

Calls are routed to the UK office in the first instance. Should all counsellors be unavailable in the UK, calls will be routed to another service centre where there is an available counsellor.

There is one case management system which is accessible in all service centres. The data for organisations in the UK is encrypted and stored in London.

This system is operated to ensure that employees seeking support at any time of day or night get to speak to a counsellor without going through a switchboard/operator system.



#### **(storage) how long do we keep your information for?**

Glasgow Life maintains a records retention and disposal schedule which sets out how long we hold different types of information for. This is available on the Glasgow Life website at [www.glasgowlife.org.uk/rrs](http://www.glasgowlife.org.uk/rrs) or you can request a hard copy from the contact address stated above.



#### **(your rights) under data protection law:**

- **Access to your information** - You have the right to request a copy of the personal information about you that we hold.
- **Correcting your information**- We want to make sure that your personal information is accurate, complete and up to date. You may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information**-You have the right to ask us to delete personal information about you where:

I. You consider that we no longer require the information for the purposes for which it was obtained

II. You have validly objected to our use of your personal information - see *Objecting to how we may use your information* below

III. Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** - You have the right at any time to request us to stop using your personal information for direct marketing purposes.

**Restricting how we may use your information**- in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for

legal claims or where there are other public interest grounds to do so.

Please contact us in any of the ways set out above if you wish to exercise any of these rights



**(complaints):**

We seek to resolve directly all complaints about how we handle personal information. If your complaint is about how we have handled your personal information, you can contact the organisations Data Protection Officer by email at [dataprotection@glasgow.gov.uk](mailto:dataprotection@glasgow.gov.uk), or by telephone - 0141 287 1055. However you also have the right to lodge a complaint about data protection matters with the Information Commissioner's Office, whose contact details are as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745;  
Website - <https://ico.org.uk/concerns>

Please note if your complaint is not about a data protection matter and instead concerns employment matters, this should be raised initially with your line manager and if necessary can be raise through the formal grievance channels.