



## **Privacy Notice for HEFESTIS Ltd Employees**

This privacy notice provides you with information about us and explains how and why we collect and use your personal data (information) as an employee of HEFESTIS Ltd.

### **Who Are We?**

The controller for the personal data is HEFESTIS Ltd. Our registered office is: HEFESTIS Ltd - Unit 27, Stirling Business Centre, Wellgreen, Stirling, FK8 2DZ

If you have any queries or concerns about how we use your personal data, you can contact our Data Protection Officer at [lpowell@hefestis.ac.uk](mailto:lpowell@hefestis.ac.uk)

### **What personal data do we collect?**

As an employee, the categories of personal data you provide may include but are not limited to:

- your name, address and contact details, including personal email address and telephone number
- date of birth, gender, marital status, and dependants
- application and employment offer information
- details of your qualifications, skills, experience, and employment history
- CV, cover letter and references from previous employers
- information about your entitlement to work in the UK
- next of kin and emergency contact information
- National Insurance Number
- Payroll details (bank account details, payroll records, and tax status information)
- Employment contract details including salary, annual leave, pension, and information about your current level of remuneration, including benefit entitlements
- workplace location
- photographs
- copy of driving licence, passport, or utility bill (where required for identification checks)
- employment records, including job titles, work history, working hours, training records, and professional memberships
- disciplinary and grievance information
- whether you have a disability or additional needs for which the organisation needs to make reasonable adjustments to support you in your role
- performance information.

We also process special category 'sensitive' data including but not limited to:

- information collected during equalities monitoring such as ethnicity or religion, or in relation to your health are processed for the purposes of carrying out requirements under employment law
- health and medical conditions, including Occupational Health Reports
- health and disability data to ensure reasonable adjustments can be made to support you in your work
- criminal offences data, where you are required to have a Disclosure Scotland and/or PVG check as part of your contract.

## How we collect your personal data

We collect most of your personal data from you during the recruitment process and throughout your employment. In certain circumstances, we may also receive information from other organisations such as Disclosure Scotland, Occupational Health providers, HMRC, Department of Work & Pensions, etc.

## How we use (process) your personal data

We process your data for the following purposes and under the lawful basis provided below:

Purpose	Lawful basis
<b>Contract management.</b> For example to: <ul style="list-style-type: none"><li>• Manage staff contracts, facilitate changes, and communicate with you about your employment</li><li>• Facilitate access to workplace buildings, ICT systems and services, and work-related events</li><li>• Undertake/implement salary reviews and calculate compensation e.g. voluntary severance</li><li>• Undertake staff surveys to monitor and improve services to staff</li><li>• Manage contract termination</li><li>• Provide references to future employers</li></ul>	<b>Contract:</b> Contract of Employment <b>Legal Obligation:</b> Employment Rights Act 1996
<b>Payroll and pension administration.</b> For example to: <ul style="list-style-type: none"><li>• Pay you and make relevant deductions e.g. Tax, National Insurance, etc.</li><li>• Pay your expense claims</li><li>• Enrol you in a workplace pension</li><li>• Administrate and manage pension membership and deductions</li></ul>	<b>Contract:</b> Contract of Employment <b>Legal Obligation:</b> Employment Rights Act 1996
<b>Leave and absence management.</b> For example to: <ul style="list-style-type: none"><li>• Manage leave entitlements</li><li>• Manage sickness absence</li><li>• Administer Special leave processes</li></ul>	<b>Contract:</b> Contract of Employment <b>Legal Obligation:</b> Employment Rights Act 1996 <b>Special Category Data:</b> Article 9(2)(b) Employment law
<b>Occupational health.</b> For example to: <ul style="list-style-type: none"><li>• Provide support and services such as Occupational Health</li><li>• Make referrals to Occupational Health service</li><li>• Implement recommendations from Occupational Health Reports</li><li>• Ascertain your fitness to work</li></ul>	<b>Contract:</b> Contract of Employment <b>Legal Obligation:</b> Health and Safety at Work Act 1974 <b>Special Category Data:</b> Article 9(2)(h) Health or social care
<b>Continuous Professional Development.</b> For example to: <ul style="list-style-type: none"><li>• Manage staff induction and maintain records of training</li><li>• Identify education, training, and development requirements</li><li>• Facilitate personal development discussions</li><li>• Maintain records of CPD</li><li>• Administrate and manage staff development bursaries</li></ul>	<b>Contract:</b> Contract of Employment
<b>Disciplinary and grievances.</b> For example to:	<b>Contract:</b> Contract of Employment

<ul style="list-style-type: none"> <li>Investigate complaints or suspicions that any practice or conduct does not meet the standards of employment or professional expectations or requirements</li> <li>Gather evidence for possible grievance or disciplinary matters</li> <li>Manage legal disputes involving you, or other employees</li> </ul>	<p><b>Legal Obligation:</b> Employment Rights Act 1996</p> <p><b>Special Category Data:</b> Article 9(2)(b) Employment law</p>
<p><b>Employee benefits</b> For example to:</p> <ul style="list-style-type: none"> <li>Administrate and provide access to employee benefits schemes where requested</li> </ul>	<p><b>Legitimate Interests</b></p>
<p><b>Health and Safety.</b> For example to:</p> <ul style="list-style-type: none"> <li>Fulfil our obligations to provide a safe working environment</li> <li>Record incidents and report to RIDDOR as necessary</li> <li>Manage legal disputes arising from accidents at work</li> </ul>	<p><b>Legal Obligation:</b> Health and Safety at Work Act 1974</p>
<p><b>Equality monitoring and reporting.</b> For example to:</p> <ul style="list-style-type: none"> <li>Provide you with advice and support, including disability services and any reasonable adjustments</li> <li>Meet our obligations to assist with monitoring equality of opportunity and eliminating unlawful discrimination</li> <li>Create and assess Equality reports for reporting purposes</li> </ul>	<p><b>Legal Obligation:</b> Equality Act 2010</p> <p><b>Special Category Data:</b> Article 9(2)(g) Substantial public interest</p>
<p><b>Protection of Vulnerable Groups (PVG).</b> For example to:</p> <ul style="list-style-type: none"> <li>Complete Disclosure and PVG checks where required for your role</li> <li>Report to Disclosure Scotland where required by law</li> </ul>	<p><b>Legal Obligation:</b> Protection of Vulnerable Groups (Scotland) Act 2007</p> <p><b>Special Category Data:</b> Article 9(2)(g) Substantial public interest</p>
<p><b>ICT Security.</b> For example to:</p> <ul style="list-style-type: none"> <li>Monitor use of workplace information and communication systems to ensure compliance with our Acceptable Use Policy and any related policies</li> <li>Ensure network and information security, including preventing unauthorised access to ICT systems and preventing malicious software distribution</li> <li>Allow secure access to the HEFESTIS network and ICT systems via multi factor authentication where staff use corporate and / or personal devices</li> </ul>	<p><b>Contract:</b> Contract of Employment</p>
<p><b>Emergencies.</b> For example to:</p> <ul style="list-style-type: none"> <li>Contact your emergency contacts in the event of an emergency</li> <li>Share health information with medical professionals in an emergency</li> </ul>	<p><b>Vital interests</b></p>
<p><b>Regulatory reporting and audits.</b> For example to:</p> <ul style="list-style-type: none"> <li>Meet reporting requirements of our Board and members</li> <li>Meet internal and external audit obligations</li> </ul>	<p><b>Legal obligation:</b> Companies Act 2006</p>

<b>Management planning and forecasting.</b> For example to: <ul style="list-style-type: none"> <li>• Complete budgeting activities</li> <li>• Undertake workforce planning</li> </ul>	<b>Contract:</b> Contract of Employment
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### Who we share your information with

On offer of employment we will share your personal data with the following:

- Referees
- Disclosure Scotland
- Health professionals and Occupational Health Providers
- Pension providers
- Auditors
- HMRC
- Our Insurers and other professional advisors
- Employee Benefit providers
- Training providers
- Contracted third parties, including ICT services and APUC Ltd who provide our HR and Finance services. APUC may subcontract parts of these functions, for example as part of their pension, payroll, and/or employee benefit provision. Further details of how APUC process your data can be found in the Privacy Notices [here](#)
- Other third parties as necessary to comply with the law.

We will also share limited personal data with Members who you are providing consultancy to and where it is appropriate to do so, for example to make them aware of any absences or to discuss your work. Similarly, we will share personal information with your HEFESTIS colleagues where it is appropriate to do so, on a need-to-know basis, for example where cover is needed because of sickness absence.

We may also share your personal data with law enforcement agencies, courts, and tribunals where we are legally required to, for example in the prevention and detection of crime including fraud.

### Failure to provide personal data

If you do not provide personal data that is required for a lawful purpose or to fulfil our contractual obligations to you, we may be prevented from complying with our legal obligations and will not be able to perform the contract that we have entered with you. In some cases, this could have an effect on your continued employment or lead to the withdrawal of any offer of employment made.

### How long do we keep it for?

We will keep your personal data for as long as necessary for us to meet our obligations as your employer and to satisfy any legal, accounting or business reporting requirements.

- Employee records are held for six years after termination of contract.
- Records of payments and banking details are retained by Finance (APUC) for 7 years for tax and audit purposes.

### Data transfers

Your information will not be shared outside of the UK or EEA.

### Automated decision making and profiling

We do not use any automated decision making about you.

### **Your rights under data protection law**

You have rights in relation to the personal data we use. These include:

- The right to be informed (this is the Privacy Notice)
- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

In addition, the following rights apply only in certain circumstances:

- The right to withdraw consent at any time (if consent is our lawful basis for processing)
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability
- The right not to be subject to automated decision-making including profiling.

You can find further details about these rights on the Information Commissioner's Office (ICO) website [here](#).

To exercise any of these rights, please contact our Data Protection Officer. You may be asked to prove your identity before getting access to data that relates to you or exercising other rights.

### **Contact us**

If you have any questions about this Privacy Notice or concerns about how we have handled your personal information, please contact our Data Protection Officer in the first instance: [lpowell@hefestis.ac.uk](mailto:lpowell@hefestis.ac.uk)

### **Contact the ICO**

If you are dissatisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office via their website <https://ico.org.uk/make-a-complaint> or by phone on 0303-123-1113. You can also write to them: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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