**Fife Employment Access Trust**

**Staff Privacy Notice (full version)**

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 whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. 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**

Fife Employment Access Trust (the 'Charity') is a 'data controller' and gathers and uses certain information about you. The Charity is also a 'data processor', we will process information received from third parties about you.

**What is personal data/information?**

Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified' and is, in effect, any information about you that enables you to be identified. This would include obvious information such as your name and contact details, but could include less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we collect, process and store is set out in this Notice.

**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 government and/or law enforcement agencies, third party agencies, our professional advisers, our regulators or funders. 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 funders as is necessary or required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate - that is, we only collect and process what we need to, and we only store it for as long as we need to. 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, either in paper form in locked cupboards, or digital information is kept securely on Office 365- Share-point. We have security measures 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 for no longer than is necessary; this normally means whilst we are working with you and for a period thereafter the length of which will depend on the nature of the service and support we are providing to you. In most cases, we will keep your information 7 years as we are required by our funders to do this. Further details are set out in our Data Retention Policy.

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

Please contact Duncan Mitchell, General Manager, who can be contacted at [duncan@feat.org.uk](mailto:duncan@feat.org.uk) or on 01592 759 371 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 Duncan Mitchell, General Manager, for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Duncan Mitchell will 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, 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.

**Changes to what we do**

We regularly review and, where necessary, update our privacy information, policies, procedures and privacy notices. If we plan to use your personal information for a new purpose we will update our documentation and privacy notice, and communicate the changes to you before starting to use the information in a new way.

**How to complain**

We hope that Duncan Mitchell, General Manager, 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/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

**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, e-mail address) , emergency contact details ( name, relationship and number of a named person)** | From you | • To enter into an agreement with you as an employee  • Legitimate interest: to maintain contact with you in order to support you in employment | • To provide you with the necessary support to carry out your duties  • To contact next of kin should you be taken ill |
| **Information about any relevant health issues (including sensitive personal information regarding your physical and/or mental health)** | From you | • Legitimate interest: to maintain client records, and ensure safe and supported employment for you  • To comply with our legal obligation of duty of care | • to provide you with the necessary support in employment  • maintain client records |
| **Information about educational qualifications** | From you | • Legitimate interests: to maintain client records and to comply with legal, regulatory and corporate governance obligations  • Job matching  • To maintain client records | • to provide you with the necessary support in employment  • to identify and support with training |
| **Criminal Record/ offence information** | From your or from a third party for example Disclosure Scotland | • to comply with our legal obligations  • to provide you with the necessary support as an employee  • to enable and support you to consider how your criminal record conviction impacts or affects your employment and to support you to look at how to address this | • to provide you with the necessary support in employment |
| **Information about your work and education history** | From you | • legitimate interest: job matching in the recruitment process  • To maintain client records | • To provide you with necessary support in employment |
| **Details of your attendance record** | From you, staff sign in sheets, back to work forms | • To monitor the impact and outcomes of the project  • To support you in employment with reasonable adjustments  • To comply with our legal obligation of duty of care  • For internal audits and evaluations (all information and data is anonymised in these circumstances (unless in the exceptional circumstance where you wish to give explicit consent for you details to be shared) | • To show the impact the project may have on you  • to compile reports to funders ( information is anonymised) |
| **Information about your identification** | From you | • Legitimate interests: to maintain client records and to comply with legal, regulatory and corporate governance obligations  • To maintain client records | • maintain client records |
| **Details in references about you that we give to others** | From your employee records | • Legitimate interests: to maintain client records and to comply with legal, regulatory and corporate governance obligations | • To provide you with the relevant reference  • To comply with legal/regulatory obligations  • Information shared with relevant managers, HR personnel and the recipient(s) of the reference |
| **Information on complaints raised by or involving you** | From you, other employees, service users, clients, volunteers, from other third parties | • To comply with our legal obligations  • Legitimate interests: to maintain client records and to comply with legal, regulatory and corporate governance obligations and good practice | • To follow our complaints procedure  • Information shared with relevant managers relevant third parties |
|  |  |  |  |

As well as having a lawful basis for processing, we will not handle any sensitive personal information (special categories) and information relating to unspent criminal convictions without first obtaining the appropriate explicit consent from you.