

Privacy Statement – ILM Programmes

The following statement explains how data is managed for the purposes of managing the employment relationship between JBG and an employee participating in an Intermediate Labour Market Programme.

Who we are:

Jobs & Business Glasgow (JBG) is a company limited by guarantee (SC108565) with charitable status (SC023930). JBG's head office is located at Ladywell Business Centre, 94 Duke Street, Glasgow, G4 0UW. JBG is an Arm's Length External Organisation of Glasgow City Council with the aim of delivering economic development activity on behalf of the city.

You can contact our data protection officer by post at City Chambers, George Square, Glasgow G2 1DU, or by email at: dataprotection@glasgow.gov.uk, or by telephone - 0141 287 1055.

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 relationship with Jobs & Business Glasgow and for us to meet our obligations to you as an employer while you are participating in a transitional employment programme.

Throughout the lifetime of your employment with Jobs & Business Glasgow 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 Jobs & Business Glasgow.
- 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 Jobs & Business Glasgow’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 council equipment and premises may result in the collection of other data. This includes;
 - Dialed telephone numbers and 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 the council 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 privacy statements published for the various services we provide and staff should consult those service delivery privacy statements for details of this processing.

Legal basis for using your information:

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 council is under a legal obligation to do so.

Who do we share your information with?

We are legally obliged to safeguard public funds so details will be checked internally for fraud prevention and 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.

In some circumstances there will be a requirement to share some information with organisation external to Jobs & Business Glasgow:

- 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 such as the Scottish Qualifications Authority and City and Guilds, for the processing of results and issuing of qualifications.
- Your personal details may be shared with the council's insurance provider for the purposes of insurance policies held by the council in respect of Employers Liability Insurance, Indemnification of employees and other insurance purposes as necessary.
- Your personal details may be shared with JBG's Employment Lawyer;
- 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 occupational pension scheme, there is a requirement to share information to ensure appropriate contributions are made and benefit calculations can be made.
- In circumstances relevant personal data may be shared with third parties in respect of processing payroll deduction 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 Jobs & Business Glasgow'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 Jobs & Business Glasgow but will inform any occupational health reports issued to Jobs & Business Glasgow by the occupational health provider.
- In the event that Jobs & Business Glasgow change occupational health provider, these medical records will transfer directly to the new provider and will not pass to Jobs & Business Glasgow.

- Jobs & Business Glasgow 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>.
- Jobs & Business Glasgow 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.
- Jobs & Business Glasgow work in partnership with Glasgow City Council to deliver the project and information on your attendance and employment will be shared with Glasgow City Council's Land & Environmental Services.
- Jobs & Business Glasgow may share information about your employment status with the organisation that refers you to the ILM opportunity, including the Department of Work and Pensions/ Jobcentre Plus.

How long do we keep your information for?

We only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on the business need. We maintain a records retention and disposal schedule which sets out how long we hold different types of information for. You can view this on our website at www.jbg.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 and 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 require 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:

If you do not have access to the internet you can contact us on the above number to request hard copies of any of the above documents.

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 Jobs & Business Glasgow's Data Protection Officer by email at dataprotection@glasgow.gov.uk or by telephone on 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 raised through our individual grievance procedures.

More information:

For more details on how we process your personal information visit www.jbg.org.uk/privacy or email quality@jbg.org.uk

If you do not have access to the internet you can contact us via telephone on 0300 123 2898 to request hard copies of our documents.