

Privacy Notice

Overview

Craigsfarm Community Development Project Ltd collects and holds personal and special categories of data that may directly or indirectly identify you (together “personal information”). We process this information for a range of purposes relating to your employment, volunteering, membership, use of facilities or participation in groups or activities, as well as safety and security.

Scope

This Privacy Notice sets out why we collect your personal information, what information is collected and how it is processed. Throughout this privacy notice we use the term ‘processing’ to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring, securing and disposing of information.

Guiding Principles

Why do we collect personal information?

Personal information is processed to effectively manage your employment, volunteering, membership or participation in groups or activities with us as follows:

1. Employee/volunteer management: day-to-day about your employment or volunteering relationship with us, for example communications; development or training; employee absence recording; risk management activities; conflict of interest recording; grievance procedures and other administrative operations as required.
2. Employee pay and benefits: to pay and provide you with any benefits to which you are entitled and as necessary to comply with our legal obligations to HMRC.
3. Accounting for and protecting workers and assets: to protect our property and assets (such as computers). To safeguard our staff, volunteers, participants and service users and ensure compliance with laws, policies and contracts through access to monitoring activity at our premises or activity using computers and devices or communications.
4. Health, safety and security: to protect and monitor health, safety and security of you and anyone else visiting our premises.
5. Pre-employment or volunteering screening: Data required to carry out checks to comply with The Protection of Vulnerable Groups (Scotland) Act 2007.
6. Equality of opportunity: to ensure equality of opportunity and treatment in compliance with our policy and equal opportunities legislation.
7. Regulatory and reporting obligations: in order to comply with applicable laws e.g. health and safety, employment laws, tax laws.

What personal information might we process?

Here are some examples of the type of personal information we may process about you.

1. Your Personal Information:

- For employees and volunteers - Personal details such as name, address, date, place of birth, nationality (and passport details), national insurance number, personal email addresses, phone numbers, dietary information and communication preferences
- For members and subscribers - Personal details such as name, address, personal email addresses, phone numbers and communication preferences
- For employee and volunteers - Education and work history including qualifications, skills and references and personal development interests
- Emergency contact details
- Work or volunteering related information such as ID and role, attendance, availability or absence records, accident records or grievance details
- Photographs and images from CCTV
- Photographs and images for the purpose of sharing our work with others
- Financial information such as salary and/or expenses and bank account details
- For employees only - information about any benefits you receive and your details of your dependents
- For service users hiring facilities - information such as catering and booking requirements
- Access details for premises and computer systems and details of any equipment assigned to you

2. Your special categories of information

When necessary we may process special categories of information relating to your racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health and sexual orientation. We may also process data relating to criminal convictions. We will only process special categories of data or criminal convictions and offences data where we have obtained your explicit consent or as otherwise permitted by applicable laws. Where we are processing personal information based on your consent, you have the right to withdraw that consent at any time.

For example:

- With your explicit consent we may process information about your sexual orientation or ethnic origin in order to monitor workplace diversity
- In compliance with our legal obligations under equal opportunities legislation; health and safety and occupational health we may process information about your physical or mental, sexual orientation or ethnic orientation
- And, for employees and volunteers we may process information about your physical or mental health to administer statutory sick pay (for employees only) or to monitor attendance and absence and to ensure you receive the correct entitlements or support



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Heart of the community

3. Who do we share your personal information with?

We may need to share your personal information with other employees, volunteers or members and other agencies or organisations that work directly with Craigsfarm Community Development Project.

Internally your personal information may be shared with the following:

- Other employees by way of internal employee or volunteer contact information, structure charts or emergency plans.
- Your line manager or named contact person
- Employees or Board Members with responsibility for certain processes and procedures, for example compensation, grievance, disciplinary or performance management
- Employees or Board members with responsibility for investigating issues or non-compliance with internal policies and contractual requirements
- Employees or Board members with responsibility for facilities and premises

We may also need to share your information with certain external 3rd parties including:

- Courts, regulators, government bodies and similar organisations as required by law
- 3rd party suppliers who provide services on our behalf
- 3rd parties who administer employee benefit or pension services
- Professional advisors or consultants contracted to Craigsfarm Community Development Project Community development project

4. How do we protect and retain your information?

Your personal information will be retained in accordance with our Record Management Policy. The retention period will be determined by a range of criteria including the type of record in which your information is included, the purpose for which we are using it and our legal obligations. On occasions we may need to hold information for longer to ensure we are able to produce records as evidence if required if there is a court order in place or investigation by law enforcement agencies.

We store some information using a third-party service called Google Sheets. You can read the associated privacy policy here: <https://policies.google.com/privacy>.

5. Monitoring

a. General

We will monitor use of computers and social media in order to protect our employees, volunteers, members, participants and users of our services and to ensure compliance with our policies. Further information about use of computers and social media is set out in our Computer Usage and Social Media Policies.

b. Why do we monitor you?

We will only undertake monitoring for the following reasons and will comply with all local laws, regulations and internal policies when doing so:

- Prevention and detection of possible criminal activity
- Ensuring compliance with our policies
- Ensuring compliance with laws
- Ensuring business continuity
- Training and development feedback

c. What kind of activity will be monitored?

- a. Social media usage
- b. Any information stored or processed on your Craigsfarm Community Development Project computer or phone
- c. Access to and use of IT systems or databases
- d. Your images captured by CCTV or official photography on the premises

6. Screening

- a. The Protection of Vulnerable Groups (Scotland) Act 2007 requires Craigsfarm Community Development Project Ltd to carry out pre-employment screening checks.
- b. Any correspondence received from Volunteer Scotland or Disclosure Scotland is checked by the Lead Signatory (Hub Manager) and records are kept.
- c. We are legally obliged to record the following information:
 - Name
 - Address
 - Date of Birth
 - Certificate number
 - PVG membership number and date of issue
- d. All certificates are then securely destroyed in line with our Records Management Policy.

7. Your Rights

a. Access, correction and deletion

You are entitled to see the information we hold about you. Contact your line manager or named contact for further information.

You can make changes to your personal information where it is incorrect or request that it is deleted on legitimate grounds, if we should not be processing that personal information or the information is being processed incorrectly. There may be circumstances where we are legally entitled to continue processing your personal information or are obliged to retain it. If access, correction or deletion is denied, the reason for this will be communicated to you.

b. Inquiries, objections and complaints

Where we rely on your consent to process your personal information you have the right to withdraw your consent to processing of your personal information at any time. Please note that we may still be entitled to process your personal information if we have another lawful basis (other than consent) for doing so.

If you have any queries about this Privacy Notice or your personal information generally, including questions about accessing or correcting it, you should contact your line manager or named contact.

You have the right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us.

c. Direct marketing

We may use your personal information to inform you about our services and events. This will only happen when you have indicated to us via your communication preferences that you wish to be contacted in this way. You have the right to object to direct marketing.

d. Changes to this Privacy Notice

We may make changes to this Privacy Notice from time to time and will inform you when the Privacy Notice is updated.

8. Processing conditions

Our entitlement to process your personal information is governed by a number of processing conditions. This means that we will rely on more than one of these conditions to process elements of your personal information during and after your employment, volunteering or membership with us.

- a. Employees - We will process your personal information where it is necessary for the performance of our contract with you. For example, in order to fulfil the legal obligations created within your employment contract.
- b. We will also process your personal information where it is required by law or regulation, for example health and safety laws, employment or taxation laws or equality laws.
- c. We will process your personal information where it is in the legitimate interests of the Craigsfarm Community Development Project employees, volunteers or the organisation. This processing will always be fair and lawful and will at all times comply with the principles of applicable privacy laws.

Appendix 1: Full list who we may process information relating to and the corresponding lawful basis for processing.

Who	What is the lawful basis for processing?
Board members, volunteers (potential and registered)	Legitimate interests (and legal obligation for PVG membership)
Employees	Legal obligation
Job applicants	Legitimate interests (and legal obligation for PVG membership)
Craigsfarm members	Legitimate interests and consent for e-communication preferences
Mailing list subscribers	Consent
Event participants	Legitimate interests
Participants - Children	Legitimate interests (and vital interests in the case of medical information)
Participants - Adults	Legitimate interests & vital interests in the case of medical information
Service users (private facilities hire)	Legitimate interests
Photos	Consent (in the case of children), legitimate interests in the case of adults.
CCTV	Legitimate interests

Monitoring and review	
Craigsfarm Community Development Project Limited will review this policy every 12 months.	
Name	Manager
Signature:	Signature:
Version Date: 22 May 2018	Version Date: 22 May 2018
Date of next review: June 2019	