

## **PRIVACY NOTICE** (Employees of Scottish Police Authority)

This is the Privacy Notice of the Scottish Police Authority (SPA) in respect of the personal data of SPA Employees, whose data that we process in carrying out our functions and tasks. SPA is a statutory body with its headquarters based at:

Scottish Police Authority  
1 Pacific Quay  
Glasgow  
G51 1DZ

SPA and Police Service of Scotland (PSoS) are joint controllers of the personal data collected for employment purposes a. For more information on how PSoS process your personal data, please see their privacy notice on their Intranet.

SPA processes personal data relating to employees in order to function effectively as an organisation, to perform its functions and to enable it to meet its obligations as an employer. For the purposes of this Privacy Notice, 'employee' includes Board Members and those who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, agency workers, consultants, professional advisers, secondees and interns.

Personal data is processed for administrative, statutory, support, and health and safety purposes. All such personal data are collected and held in accordance with Data Protection Law. Further details about how we comply with Data Protection Law are provided in our Data Protection Policy [Data Protection Policy](#)

SPA have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact Details:

Data Protection Officer  
Scottish Police Authority  
[SPAIM@spa.police.uk](mailto:SPAIM@spa.police.uk)  
1 Pacific Quay  
Glasgow  
G51 1DZ

## **WHAT IS THE PURPOSE OF THIS PRIVACY NOTICE?**

As a data controller, SPA is responsible for making decisions about the means by which, and the purposes for which, we process your personal data. SPA is committed to protecting the privacy and security of employee data. This Privacy Notice describes how we collect and use personal data about you in accordance with Data Protection Law (the Data Protection Act 2018 and the UK General Data Protection Regulation; and any legislation that, in respect of the United Kingdom, replaces, or enacts into United Kingdom domestic law, the General Data Protection Regulation (EU) 2016/679, the Regulation on Privacy and Electronic Communications or any other law relating to data protection).

It is important that you read this Privacy Notice, together with any other privacy notice we provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

## **1. HOW IS PERSONAL DATA COLLECTED**

In most cases SPA will receive data about you from PSoS as providers of employment and HR services. We may also receive information from you directly.

## **2. THE DATA WE COLLECT ABOUT YOU**

The personal data likely to be processed include:-

Employees' personal data:

- Name
- Address and contact details
- Sex/gender
- Employment history, appointment details and correspondence
- Register of interests

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- Bank account details
- Passport, NI number and other identification papers
- Pension and benefits details
- CVs, references
- Photographs
- marital status
- dependents
- next of kin contact details
- salary and tax
- performance information
- disciplinary or grievance information
- CCTV footage
- email use
- any telephone call records

### **Special category personal data:**

- Information about your health or if you have had an accident at work
- Information about your race or ethnicity
- Information about your religion
- Information about any disabilities you may have
- Offence or conviction information
- Trade union membership
- Political affiliations

### **Processing Conditions**

The personal data referred to above is processed for the purposes of any contract or potential contract with our employees, or for our legitimate interests in order to function effectively as an organisation provided that these interests are not outweighed by the impact on the individuals concerned, and provided it does not involve special or sensitive types of personal data. Such legitimate interests may include: for the effective operation of payroll systems, tax systems expense reimbursement and related procedures; for staff appraisal/performance evaluation; or in the interests of security.

We may also process it to carry out our legal obligations, for equal opportunities monitoring or to establish, exercise or defend any legal claims

We will only use personal data for the purposes for which they were provided to us, unless we reasonably consider that we need to use the data for another reason and that reason is related to and compatible with the original purpose. If we consider that we need to use your

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personal data for an unrelated purpose, we will notify you of that decision and we will explain to you the legal basis which we consider allows us to do the processing for that purpose. We may also process your personal data without your knowledge or consent, where such processing is either required or permitted by law.

### **Special category personal data**

In some circumstances, we may need to collect, or request on a voluntary disclosure basis, some special category personal data, as defined in Data Protection Law, for employment-related purposes. This may include information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations or, information about your physical or mental condition to provide work-related accommodations, health and insurance benefits to you and your dependents, or to manage absences from work.

Where we rely on consent as a means to process your personal data, this must meet the requirements of valid consent under Data Protection Law; you may withdraw this consent at any time. We will process any information about our employees where they have had an accident at work, for the purposes of preventive or occupational medicine or for an assessment of their working capacity, subject to appropriate confidentiality protections.

We will also process information about criminal convictions/offences where necessary. We will only collect information about criminal convictions if it is appropriate, given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the process for employing you, or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- To assess whether you are suitable to employ (including whether you are prohibited or barred from doing so by any applicable law).
- To assess whether you pose a threat to the health, safety, security or confidentiality of SPA, PSoS, our other employees, our service users or any third party.
- To prevent crime, including fraud.
- To ensure safety, security or confidentiality of our other employees, service users and other third parties.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.

- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

We are allowed to use your personal data in this way to carry out our obligations and for the purposes of preventing or detecting unlawful acts, protecting the public against dishonesty, to prevent fraud, to safeguard children and individuals at risk, to safeguard the economic well-being of certain individuals, to protect individuals' vital interests, to process information in the public domain, to process information for the purposes of or in connection with legal claims or prospective legal claims and where it is necessary to process information in the public interest or substantial public interest. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

### **3. Who do we share your information with?**

We will share your personal data with third parties where we are required to do so by law. We will also share your personal data with third parties where it is necessary to do so to administer the working relationship with you or where we have another legitimate interest in doing so, such as sharing the information internally with other employees, e.g. our professional advisers and external contractors, and our auditors.

We will also share your personal data with PsoS as joint controllers and providers of employment and HR services.

### **4. Security**

We employ administrative, electronic and physical security measures to ensure that the data that we collect about you is protected from access by unauthorised persons and protected against unlawful processing, accidental loss, destruction and damage. Further details are set out in our Information Security SOP.

### **5. The period for which the personal data will be processed**

We will retain personal data securely and only for as long as is necessary to keep for the specified purposes or for a legitimate and lawful reason. Our retention periods can be found in our Records Retention Policy ;

[Records Retention SOP](#)

## **6. Data subjects' rights**

You have the following rights as a data subject under Data Protection Law in relation to the processing of your personal data:

- To request access to your personal data (a data subject access request), which enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- To request correction of the personal data that we hold about you, to have any incomplete or inaccurate information corrected.
- To request erasure of your personal data, so that we delete or remove personal data where there is no good and lawful reason for us to continue to process it (although in some cases we can refuse this request where we can claim exemptions as a data controller).
- To object to processing of your personal data where we are processing your personal data for direct marketing or where we are relying on a legitimate interest (of SPA or of a third party) and there is something specific to your particular situation which gives rise to your objection.
- To request the restriction of processing of your personal data, through the suspension of our processing, e.g. where you want us to establish its accuracy or the reasons for the processing.
- To request the transfer of your personal data to another party in an easily portable format.

For more information and guidance about any of these rights, please go to the website of the Information Commissioner's Office at <https://ico.org.uk/>.

## **7. Complaints**

If you think there is an issue in the way in which we handle your personal data, you have a right to raise a complaint with the Information Commissioner's Office. Their website contains details of how to make a complaint: <https://ico.org.uk/>. We would, however, appreciate the chance to deal with any concerns you might have before you approach the ICO, if you would like to contact us in the first instance.

## **8. Changes to this Privacy Notice**

We keep our Privacy Notice under regular review and reserve the right to update and amend it. This notice was last updated on 16 July 2024.

**9. Further information**

For further information about any aspect of this notice please contact the Data Protection Officer [SPAIM@spa.police.uk](mailto:SPAIM@spa.police.uk)