

PRIVACY NOTICE

APUC/UCSS Staff Members

March 2024

This privacy notice provides you with information about how we handle your personal information as an employee. We may update this Privacy Notice from time to time and will publish an up to date copy on the APUC website.

Who Are We?

APUC (Advanced Procurement for Universities and Colleges) Limited is the procurement centre of expertise for Scotland's Universities and Colleges. We are wholly owned by our member HE and FE institutions and therefore acts as a subsidiary for them. Our contact details are: APUC Ltd, Unit 27, Stirling Business Centre, Wellgreen, Stirling, FK8 2DZ, Tel: +44 (0) 131 442 8930.

If you have any questions or concerns about how we collect, store or use your information, please contact our Data Protection Officer - dataprotection@apuc-scot.ac.uk

What Types of Personal Information Do We Collect?

- Contact details
- Date of Birth
- Bank Account
- National Insurance Number
- Absence Records
- Performance Records
- Equality monitoring
- Copies of ID
- Criminal Convictions
- Emergency contact details
- Photos of you

Full details of the personal information we may collect, in addition to the purposes and lawful basis for processing are shown in the table in appendix 1.

Where does your Personal Information Come From?

We may collect your Personal Information in a number of ways, for example:

- When you contact us through HR or our governance team either via telephone or email;
- When we collect data through the implementation of any governance / HR Employee Relations Policies e.g. Disciplinary, Grievance
- In the course of managing your employment or relationship with APUC, for example PRD, payroll
- When you use any HR services
- When we receive your information from third parties, for example references; security screening; and recruitment agencies.

Who we may share your Personal Information with?

We may share your personal information with the following parties:

- HMRC

- With employees, agents and/or professional advisors
- APUC member institutions, other UK Purchasing Consortia, Centres of Expertise, Scottish Government
- With other third party contractors who provide services to us, for example payroll, pension, IT system providers
- Current and potential framework suppliers (in order to conduct business)
- The public generally: for business promotion, we may share details of your name, work location, job role and photograph.

What is the Lawful Basis for Processing your Personal Information?

We process your personal information under the following lawful basis:

- **Contract** – the processing is necessary for a contract with you or to take steps before entering a contract.
- **Legal Obligations** – the processing is necessary to comply with the law.
- **Legitimate Interests** – the processing is necessary for our legitimate interests or that of a third party.

Where is your personal data stored?

We don't routinely transfer staff personal data outside the UK or the EU, however in some cases this may be necessary due to the arrangements of third parties with whom we share information. Where this is the case we will ensure that appropriate safeguards are in place.

How long will we keep your Personal Data?

We keep your personal information only for as long as is reasonably necessary for the purposes for which we process your personal information, including to satisfy any legal, accounting or reporting requirements and as detailed below:

- We will retain **current** bank account details during your engagement and delete these 6 months after the final payment to you following the termination of your engagement.
- We will retain **current** emergency contact details during your engagement and delete these when your engagement terminates.
- We will retain payroll and wage records, salary and benefits details, including pension and bonus details during your engagement and until 7 years after termination;
- We will retain photographs of you during your engagement and delete these when your engagement terminates;
- We will retain tax records for 7 years from the end of the tax year to which they relate.

What Are Your Rights Regarding Your Personal Data?

You have the following rights under data protection legislation in relation to the personal information that we hold about you.

- The right to request a copy of your personal data which APUC holds about you
- The right to request that APUC corrects any personal data if it is found to be inaccurate
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to lodge a complaint with the Information Commissioners Office.

In some circumstances you may have the following rights:

- The right to request your personal data is erased where it is no longer necessary for APUC to retain such data
- The right to withdraw your consent (where consent is the lawful basis)
- The right to request that APUC provide you with your personal data and where possible, to transmit that data directly to another data controller
- The right to object to the processing of personal data

We aim to resolve all complaints internally via our Data Protection Officer, but you do have the right to complain to the Information Commissioner at any time. Their contact details can be found here: [Make a complaint | ICO](#)

Appendix 1 Table showing Personal Information, Purpose and Lawful Basis for Processing

Please note: - Data marked * in the table below is ‘special categories of personal information’ or might disclose such information. We must have additional legal grounds for processing special categories of personal information – these are listed in the middle column of the table.

Purpose for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<ul style="list-style-type: none"> To make a decision about your recruitment or appointment To determine the terms on which you work for us, and advise you of these 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation 	<ul style="list-style-type: none"> Personal contact details (including name, address, email, telephone number) Your application form, CV and interview notes References and details of previous employers Professional memberships and qualifications Offer letter, contract of employment Working time opt-out agreements Work location
<ul style="list-style-type: none"> To check you are legally entitled to work in the UK 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation 	<ul style="list-style-type: none"> Personal contact details Documentation confirming your right to work in the UK Copy of your passport
<ul style="list-style-type: none"> To contact you To administer our contract with you To ensure compliance with the terms of your contract To provide and process payments and benefits to you (including complying with pension auto-enrolment obligations, liaising with your pension provider and determining pension eligibility) If applicable, to deduct tax and national insurance 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	<ul style="list-style-type: none"> Personal contact details Work location Offer letter and contract of employment Start date Bank account details Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details Tax and national insurance details, including national insurance number Absence records (excluding data disclosing sickness and health information) Hours worked Holiday records Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependants* Age and date of birth Health data and sickness records, including disability information*

<ul style="list-style-type: none"> To carry out checks via Disclosure Scotland for the Protection of Vulnerable Groups 	<ul style="list-style-type: none"> To comply with a legal obligation <p>*For Criminal Convictions</p> <ul style="list-style-type: none"> To meet our obligations for safeguarding children and individuals at risk 	<ul style="list-style-type: none"> Personal contact details Copies of formal ID e.g. Passport, Driving Licence, Bank Statements Criminal Convictions
<ul style="list-style-type: none"> To carry out business management and planning, including accounting or auditing To manage performance and conduct To make decisions about salary and compensation To conduct disciplinary and grievance proceedings To assess qualifications and suitability for a job or task, including promotion decisions To manage flexible working applications To make decisions about continued employment or engagement To make arrangements for the termination of our working relationship 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation <p>*For special categories of information:</p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations To review equality of opportunity or treatment 	<ul style="list-style-type: none"> Personal contact details Work location Photograph of you Offer letter and contract of employment Start date Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details Absence records Hours worked Holiday records Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependants* Details of job titles and duties, work history, performance and appraisal records Age and date of birth Information and correspondence regarding flexible working applications Professional memberships and qualifications Training records Information and correspondence relating to disciplinary and grievance investigations and proceedings Information confirming you have read and understood our policies and procedures Information about your use of our information and communication systems, and emails passing through our systems Redundancy information, including pooling data, selection matrixes, consultation notes, correspondence Marriage or civil partnership status* Gender

<ul style="list-style-type: none"> • To provide access to staff benefits, including access to tools and publications to promote staff wellbeing • To reward staff for performance • To conduct staff surveys 	<ul style="list-style-type: none"> • For our Legitimate Interests: <ul style="list-style-type: none"> ○ To provide positive recognition to employees ○ To provide access to benefits from third parties ○ To provide information in support of company accreditation schemes ○ To identify potential practice improvements 	<ul style="list-style-type: none"> • Work Contact Details • Payroll Number • Performance • Survey response data • Information regarding caring responsibilities
<ul style="list-style-type: none"> • To manage sickness absence • To assess your fitness to work • To consider disability status and reasonable adjustments for disabled workers • To consider protected characteristic status and related working arrangements 	<ul style="list-style-type: none"> • To enter or carry out a contract with you • To comply with a legal obligation <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> • To exercise or perform employment law rights or obligations • For the purposes of preventive or occupational medicine, or for the assessment of your working capacity • To review equality of opportunity or treatment 	<ul style="list-style-type: none"> • Personal contact details • Work location • Start date • Offer letter and contract of employment • Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details • Absence & Holiday records • Health data and sickness records, including disability information* • Hours worked • Information and correspondence regarding pregnancy, birth and maternity leave* • Information and correspondence regarding breastfeeding* • Information and correspondence relating to disciplinary and grievance investigations and proceedings • Information confirming you have read and understood our policies and procedures • Details of job titles and duties, work history, performance and appraisal records
<ul style="list-style-type: none"> • To manage requests for time off work, including but not limited to time off for: <ul style="list-style-type: none"> ○ Antenatal appointments; ○ Maternity, paternity, adoption, parental and / or shared parental leave ○ Time off for dependants ○ Bereavement ○ Jury service ○ Emergency leave / Carer's leave 	<ul style="list-style-type: none"> ○ To enter or carry out a contract with you ○ To comply with a legal obligation <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> ○ To exercise or perform employment law rights or obligations 	<ul style="list-style-type: none"> • Personal contact details • Start date • Offer letter and contract of employment • Work location • Absence records • Information and correspondence regarding pregnancy, birth, maternity leave, paternity leave, adoption leave, parental leave, shared parental leave and time off for dependants* • Dependants*

<ul style="list-style-type: none"> To carry out education, training, and development 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation 	<ul style="list-style-type: none"> Personal contact details Work location Start date Absence records Details of job titles and duties, work history, performance and appraisal records Professional memberships and qualifications Training records
<ul style="list-style-type: none"> To monitor your use of our IT and communications systems 	<ul style="list-style-type: none"> To enter or carry out a contract with you 	<ul style="list-style-type: none"> Name Work location Information about your use of our information and communication systems, and emails passing through our systems Correspondence to and from you (electronic or otherwise) and telephone voicemail messages during times when you are absent from the workplace
<ul style="list-style-type: none"> To comply with health and safety obligations 	<ul style="list-style-type: none"> To comply with a legal obligation <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To exercise or perform employment law rights or obligations For the purposes of preventive or occupational medicine, or for the assessment of your working capacity 	<ul style="list-style-type: none"> Your name Health data and sickness records, including disability information* Accident records Training records Hours worked Information regarding pregnancy and maternity* Information and correspondence regarding breastfeeding*
<ul style="list-style-type: none"> To maintain records of your working time, holidays, and working time opt-out agreements 	<ul style="list-style-type: none"> To enter or carry out a contract with you To comply with a legal obligation 	<ul style="list-style-type: none"> Your name Hours worked Working time opt-out agreements Holiday records
<ul style="list-style-type: none"> To protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency) 	<ul style="list-style-type: none"> To protect your vital interests or those of another person <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> To protect the vital interests of you or another person, if you are incapable of giving consent 	<ul style="list-style-type: none"> Personal contact details Work location Accident records Health data and sickness records, including disability information* Emergency contact details

<ul style="list-style-type: none"> • To conduct business operations including tendering exercises, supplier and contract management • To provide a shared service to APUC member organisations • For assessment and analysis purposes to help improve the operation of, and manage the performance of our business • To promote APUC via the website by providing staff contacts and photos 	<ul style="list-style-type: none"> • To enter or carry out a contract with you • For our legitimate interests: to promote APUC by displaying staff images and contact details on our website. 	<ul style="list-style-type: none"> • Your name • Work location • Professional memberships and qualifications • Details of job titles and duties, work history, performance and appraisal records
<ul style="list-style-type: none"> • Prevent and detect crime and ensure a secure work environment 	<p>For our legitimate interests</p> <ul style="list-style-type: none"> ○ Verify the identity of individuals accessing our premises ○ Prevent and detect theft 	<ul style="list-style-type: none"> • Name • Work location