



**BOWLS SCOTLAND
EMPLOYEE PRIVACY NOTICE
JUNE 2020**

What we need

Bowls Scotland is the Governing body for outdoor lawn bowls in Scotland.

Lawn bowls is a sport for everyone, and we are committed to developing the sport in an inclusive, equitable and fair way.

Bowls Scotland will be a “controller” of the personal information that you provide to us as your employer / prospective employer.

When you submit an application to enter a contract of employment with us, we will collect, store and use the personal information you have provided to us in your cover letter, application form and C.V. If you are successful, we may ask you for additional personal information during the course of your employment, which shall be collected, stored and used in accordance with this privacy notice.

We may also receive your personal information from other employees, board members, members and other individuals that we engage with, such as athletes, and our pension scheme administrator during the course of your employment.

When considering your application, the type of personal information that we collect includes:

- *Personal details, including contact details, nationality and right to work and details of your qualifications, experience and employment history;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs; and
- Details of your referees.

During the course of your employment, the type of personal information that we collect includes:

- *Personal details, including contact details, nationality and right to work, details of your spouse/partner and any dependents; and details of your qualifications, experience and employment history;
- *Financial information, including your bank details, salary and benefits, pension arrangements, NI and tax information;

- *Health information, including disability status, additional support requirements, and sickness absences;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- Performance information, including grievances, disciplinary, conduct issues, appraisal, performance reviews, time and attendance records, applications for other positions, IT usage and references; and
- Your image and social media usage.

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked * above to us to enable us to verify your right to work and suitability for the position, pay you, provide you with your contractual benefits and administer statutory payments, such as statutory sick pay. If you do not provide this information we may not be able to employ you, make these payments or provide these benefits.

Why we need your personal information – contractual obligations

We need to process our employees’ personal information to perform our obligations as your employer under your employment contract. We will use our employees’ personal information to:

- Administer our payroll and report your earnings to HMRC;
- Manage our pension scheme by auto enrolling employees into Bowls Scotland workforce pension scheme;
- Maintain records on your performance at work, including any performance reviews and disciplinary proceedings; and
- Maintain records on annual leave, sickness, maternity leave etc.

Why we need your personal information – employment law

We are under a legal obligation to process certain personal information relating to our employees for the purposes of complying with our obligations under employment law.

Why we need your personal information – legitimate interests

We also process our employees’ personal information in pursuit of our legitimate interests to:

- Carry out a fair recruitment process, progress your application, arrange interviews, make an informed decision to shortlist for interview and recruit and inform you of the outcome at all stages;
- Maintain employment records, training and quality control;
- Comply with regulatory and corporate governance obligations;
- Ensure good employment practice and safe working practices;
- Monitor and manage access to our systems and facilities and record absences;
- Protect our networks and information against authorised access or data leakage;
- Ensure our business policies are adhered to by employees;
- Promote our activities, services and our sport; and
- Investigate disciplinary matters and grievances.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at info@bowlsscotland.com. If we agree and comply with your objection, this may affect our ability to comply with our duties as your employer.

Why we need your personal information – health and social care

We may be required to process personal information relating to your health to assess your working capacity as an employee by Bowls Scotland.

Why we need your personal information – equality of opportunity or treatment

We are required to use our employees' personal information relating to your health, racial or ethnic origin, etc. for equality monitoring purposes.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

We will also use this personal information to consider and provide any reasonable adjustments as required under the Equality Act 2010.

Who we share your personal information with

If your personal information is included in any images or videos taken by us at our events and competitions, we may share this with **sportscotland** and Team Scotland, World Bowls, Commonwealth Games Scotland, Commonwealth Youth Games Scotland, British Isles Bowling Council (BIBC), British Isles Women's Bowling Council (BIWBC) and any other partners associated with Bowls Scotland for promotional and / or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include HMRC, the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children and preventing fraud.

We may also share personal information with our professional and legal advisors for the purposes of taking advice. Where we are undertaking any internal investigation regarding a grievance or disciplinary, we may need to share your personal information with those involved in the investigation and our advisors. If we are asked for a reference by your new employer then we will only share confirmation of dates of employment (start and end date), confirmation of last job role, job responsibilities, character reference).

Bowls Scotland employs third-party suppliers to provide services, including, but not limited to, payroll, IT, and mobile phones. These suppliers may process personal information on our behalf as "processors" and we are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do not share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on our manual / electronic filing systems and our servers based in the National Centre for Bowling and is accessed by our staff for the purposes set out above.

Where your personal information is transferred out with the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

We use MailChimp and Dropbox, US-hosted third party providers, to send out some of our email communications and store your personal information, who are both certified as adhering to the EU-Privacy Shield. MailChimp's privacy policy can be accessed <https://mailchimp.com/legal/privacy/>

and Dropbox's privacy policy can be accessed https://www.dropbox.com/en_GB/business/trust/privacy/data-protection

How long we keep your personal information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised or anonymised, and the longer period for which they will be kept.

If your application is successful, we will keep your personal information for as long as necessary to comply with our employment law obligations. We will review and possibly delete your personal information following a period of three years after you have ceased to be employed with us, financial information will be retained for seven years from the end of the relevant financial year.

We will keep certain personal information of employees for longer in order to confirm your identity, when you were an employee of Bowls Scotland and for how long.

We need to do this to comply with our employment law obligations or in the event of a claim against Bowls Scotland.

Your rights

You can exercise any of the following rights by writing to us at our registered office

Private & Confidential
Senior Administration Officer
Bowls Scotland
National Centre for Bowling
Hunters Avenue
Ayr
KA8 9AL

Or email info@bowlsscotland.com

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes;
- if you wish us to delete your personal information that we hold about you, you may request that we do so;
- you have a right to object to our processing of your personal information in certain circumstances;
- you may request personal information concerning you held by us, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit such information to a third party in certain situations; and
- if applicable, you have a right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

Any requests received by Bowls Scotland will be considered under applicable data protection legislation.

If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk

FOR FURTHER INFORMATION GO TO:

W: www.bowlsscotland.com

E: info@bowlsscotland.com

T: 01292 294 623



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Registered Name and Office:

Bowls Scotland
National Centre for Bowling,
Hunters Avenue,
Ayr
KA8 9AL

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