

# Privacy Notice – Employees

Date notice written: June 2025



## Why is this information being processed?

The information provided by you will be used by Perth and Kinross Council to manage your employment and to meet our obligations to you as an employer.

## Who is processing this information?

The personal information you have provided will be processed by Perth and Kinross Council, Council Building, 2 High Street, Perth, PH1 5PH. Email [Enquiries@pkc.gov.uk](mailto:Enquiries@pkc.gov.uk) or telephone 01738 475000.

## Why is it lawful for the Council to process this information?

The information provided by you in relation to your employment will be used by Perth and Kinross Council for the following purposes if required during the course of your employment:

- to identify and communicate with you as necessary
- to assess your suitability to perform specific roles, including those which require disclosure checks: if disclosure or PVG checks are required, the Council will process information regarding criminal convictions and any police intelligence reports regarding suspected criminality to assess your suitability of the post in question
- to assess your eligibility to work in the UK
- to check your employment history and qualifications
- to process payments to you
- to assess your qualification for categories of leave and for payments of allowances and statutory payments
- to allow the Council to comply with its statutory responsibilities in relation to your health and wellbeing, including occupational health, and to manage attendance
- if you have provided us with personal characteristic information as defined in the Equality Act 2010 and other equalities-related information, we may use this for statistical monitoring of the Council's workforce
- to manage and record online training/e-Learning undertaken
- to manage and record details of any attendance, disciplinary or grievance procedures in which you are involved



- to manage and record details of your use of clocking systems, Council telephone and computer systems (including internet usage) and emails sent and received on Council systems
- to manage and record details of staff who may be required to operate a vehicle as part of their duties of employment, such as: Driving Licence Number, routes of driving and driver performance (monitoring and tracking)
- to manage and record images of you on CCTV systems in Council premises
- to provide managers with insights into employee data, statistics may be displayed in a Power BI report called the People Analytics Dashboard
- to provide references on request for current or former employees
- to provide workforce data for service planning, targeting resources and workforce planning
- for relevant staff, information provided by you will be used to provide assurances to the Department for Work and Pensions (DWP) that, as an employee of Perth and Kinross Council with access to DWP and HMRC data, the appropriate pre-employment checks have been conducted under the requirements of the Baseline Personnel Security Standards (BPSS).

Formally, the processing of personal data provided to us for some of these purposes satisfies Article 6(1)(b) of the UK General Data Protection Regulation – “Processing shall be lawful...to the extent that: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”. In this instance, the contract is the contract of employment (or in the case of recruitment, to take steps to enter into a contract with you).

The processing will also satisfy, on occasion, Article 6(1)(c) – “Processing is necessary for compliance with a legal obligation to which the controller is subject”. In this instance, the legal obligations are those arising from, for example, Health and Safety at Work legislation.

### **Will any sensitive personal information (Special Category Data or information about criminal convictions etc) be processed?**

When it is necessary to do so, special category data will be processed.

### **If so, why is it lawful for the Council to process this information?**

Article 9 (b) of the UK GDPR permits the processing of special category data “for the purposes of carrying out the obligations.....in the field of employment” if the “processing is necessary



for the purposes of performing or exercising obligations or rights which are imposed or conferred by law” (Section1, Part 1, Schedule 1, Data Protection Act 2018).

### **Will this information be shared?**

Your personal information will not be disclosed to third parties unless it’s necessary for us to do so in order to verify its accuracy, prevent or detect crime, protect public funds or where required by law, or when it necessary for the Council to do so to fulfil its obligations as an employer. The Council may check information provided by you, or information about you provided by a third party, with other information held by us.

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.

In order for the Council to fulfil its obligations it may be necessary for us to share personal information with the following third parties:

- registered employment bodies such as the Scottish Social Services Council and the General Teaching Council for Scotland
- the Health and Safety Executive in relation to accidents at work
- the Council’s insurance provider
- courts or tribunals
- Dundee City Council, who administer Perth and Kinross Council’s pension scheme
- third parties in respect of trade union subscriptions, salary sacrifice schemes, charitable giving schemes, payments in respect of court orders or credit union contributions
- the Council’s Occupational Health provider
- the Department of Work and Pensions
- the Council 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
- 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



- 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
- some officers may be required, as part of their duties, to attend or speak at Council committees or sub-committees: if these meetings are webcast then images of the meeting (including the attendance or contribution of officers attending) will be published on the Council's website
- if you are the author of a committee report or named as the contact point in that report, your name, service and work telephone number will be published on the committee report on the council website

Perth and Kinross Council is a public authority in terms of the Freedom of Information (Scotland) Act 2002. In response to requests for information made under this legislation it may sometimes be necessary to release a limited amount of personal information about senior staff, including names and job titles. Information is only released if doing so is compatible with our obligations under data protection legislation.

### **How long will this information be kept for?**

For most staff, personal information held on Perth and Kinross Council systems in relation to employment is kept for 6 years after your leaving date. After this it will be deleted.

However, in the case of staff whose posts are subject to disclosure checks, personal information held on Perth and Kinross Council systems in relation to employment is kept for 25 years after your leaving date. After this it will be deleted.

If you work in an area where CCTV cameras or Body Worn Cameras are in use, personal information recorded will be retained in accordance with the relevant Council policy.

### **Personal information rights**

Individuals have rights in relation to the information the Council holds about them, including the right to request a copy of their information. You can find out more about your [personal information rights](#) on our website or by contacting the Council's Information Governance Team at the address below.

### **Data Protection Officer**

The Council has a Data Protection Officer who you can contact in the first instance if you have any questions or complaints about how we are processing your personal information.



Please contact by writing to the Data Protection Officer, Perth and Kinross Council, Council Building, 2 High Street, Perth, PH1 5PH, by emailing [DataProtection@pkc.gov.uk](mailto:DataProtection@pkc.gov.uk) or by telephoning 01738 475444.

### **Information Commissioner's Office**

If you want to complain about how the Council has processed your information you have the right to contact the [Information Commissioner's Office](#) via their website or by telephoning 0303 123 1113.

### **Information Governance Team**

If you have any questions about how the Council processes your information, or if you would like a copy of this notice in another language or format, please contact the Information Governance Team:

Information Governance  
Legal and Governance Services  
2 High Street  
Perth  
PH1 5PH

Email [DataProtection@pkc.gov.uk](mailto:DataProtection@pkc.gov.uk)

Telephone 01738 477933