

# **Applecross Community Company: Privacy Notice for Staff and Volunteers**

## **Introduction**

Applecross Community Company (hereafter ACC) takes our privacy and data protection responsibilities seriously. This Privacy Notice sets out how ACC and its trading subsidiary Applecross Community Trading Ltd (ACT) will process personal data in line with requirements of the Data Protection Act 2018. It applies to all records held and managed by ACC and ACT which relate to staff (including those who are self-employed) and volunteers.

This Notice should be read in conjunction with ACC's Data Protection Policy and Records Retention Policy, available on request. A separate Privacy Notice covers how ACC and ACT processes information relating to ACC members, customers, contractors and clients.

## **Definitions**

Data Protection Act 2018 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Controller – The person who (either alone or with others) decides what personal information ACC will hold and how it will be held or used.

Data Protection Officer – The person(s) responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 2018.

Processing – means collecting, amending, handling, storing, destroying or disclosing personal information. This includes whether on paper, in a computer, or recorded on other material.

Personal Data – Information about living individuals that enables them to be identified – e.g. name and address, where they appear together. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within ACC or any individual for whom the ACC holds personal details.

Member – means an “Ordinary Member” of ACC, as defined by our Articles of Association.

This Notice has been developed in line with recommendations and templates provided by the [Information Commissioner's Office](#) (ICO).

## **Contact Details**

ACC is a company limited by guarantee (No. SC342825) and a registered charity in Scotland (No. SC042865). ACC is a “Data Controller” responsible for your personal data, in line with legislation and is registered as a data processor with the ICO (registration number: 00013348017).

If you have any queries about this Notice or how we use your data, or to exercise any of your data rights, you can contact us by:

- Letter: Filling Station, Shore Street, Applecross, Strathcarron, IV54 8LR
- Email: [ido@applecrosscommunitycompany.org](mailto:ido@applecrosscommunitycompany.org)
- Phone: 01520 930 072

## **What information we collect, use and why**

In the course of your employment or volunteering activities with ACC or ACT, we may need to collect personal information about you.

### a) Staff recruitment, administration and management

We collect or use the following personal information as part of staff recruitment, administration and management, as well as in order to comply with legal requirements:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Gender
- Copies of passports or other photo ID
- Copies of proof of address documents (eg bank statements or bills)
- Next of kin or emergency contact details
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Details of any criminal convictions (eg checks with Disclosure Scotland)
- Political, conflict of interest or gift declarations
- Performance records (eg reviews, disciplinary records, complaints or disciplinary action)
- Training history and development needs

### 2) Staff salaries and pensions

We collect or use the following personal information as part of managing salaries and pensions for staff:

- Job role and employment contract (eg start and leave dates, salary, changes to employment contract or working patterns)
- Time spent working (eg timesheets)

- Expense claims or other payments claimed
- Leave (eg sick leave, holidays or special leave)
- Maternity, paternity, shared parental and adoption leave and pay
- Pension details
- Bank account details
- Payroll records
- Tax status

### 3) Volunteers

We may collect or use the following personal information while working with volunteers:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- Next of kin or emergency contact details

### 4) Health and wellbeing of staff and volunteers

We collect or use the following personal information for managing staff and volunteers health and wellbeing:

- General health and wellbeing information
- Sick leave forms or fit notes (eg Statement of Fitness for Work from a GP or hospital)
- Accident at work records

## **Our lawful bases for the processing of your data**

Under UK Data Protection Law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) and you can find out more about them on the ICO's [website](#).

We will only use your personal data where it is permitted by the Data Protection Act 2018 and where:

- a) we need to use your personal data to fulfill our obligations to you as your employer;
- b) we need to use your personal data to enter into a contract with you;
- c) we need to use your personal data to comply with our legal or regulatory obligations (such as safeguarding or health and safety obligations);
- d) you have given us consent to use your personal data. If consent is needed we will ask for this from you separately; and
- e) it is in our legitimate business interests or the legitimate business interests of a third party we work with to use your personal data for specified purpose, and there is no disadvantage to you or risk to your personal data.

## **Where we get personal information from**

We collect your information from the following places:

- Directly from you
- Pension administrators or government departments (eg HMRC)
- Disclosure Scotland (in relation to safeguarding checks, if required)
- Referees (external or internal)
- Applecross Primary School and Highland Council (in relation to safeguarding checks associated with the Community Transport and School Transport project)

## How long we keep information

The following table summarises the record retention periods required by legislation covering personal information ACC and ACT may collect about you.

| # | Legislation                                        | Examples of records                                                                                                                                                                  | Retention period                                                                                                      |
|---|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| 1 | Charities Act 2005 & Companies Act                 | Minutes of Director meetings and decisions made as resolutions in writing. Minutes of Annual General meetings and members resolutions passed other than at an Annual General Meeting | Minimum period is 10 years however the charity policy is to permanently retain these records                          |
| 2 | Charities Act 2005 and UK Data Protection Act 2018 | Personal information about ACC members and volunteers                                                                                                                                | Only for period of individual's membership or involvement in activities                                               |
| 3 | Charities Act 2005 & Companies Act                 | Organisational versions of ACC, ACT and group annual accounts and audits (separate to those available via Companies House)                                                           | Permanently                                                                                                           |
| 4 | Charities Act 2005 & Companies Act                 | Purchase Invoices, Records of monies received and paid<br>Grant, fundraising and gift aid records.                                                                                   | 6 years after the end of the current period                                                                           |
| 5 | HMRC                                               | Employee details                                                                                                                                                                     | 6 years after the end of the current period                                                                           |
| 6 | Taxes Management Act                               | Income Tax Records, P45 and P60                                                                                                                                                      | 6 years after the end of the current period                                                                           |
| 7 | Equality Act 2010<br>Limitations Act               | Application forms and interview notes for unsuccessful candidates (recruitment of staff and contracting opportunities)                                                               | Six months to a year                                                                                                  |
| 8 | Charities Act 2005 and UK Data Protection Act 2018 | Records relating to child or adult safeguarding protection concerns                                                                                                                  | 50 years                                                                                                              |
| 9 | RIDDOR Regulations 2013                            | Accident books, records/reports                                                                                                                                                      | Legal requirement 3 years after last entry or end of investigation if later. Charity will retain for at least 6 years |

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

## **Who we share information with**

In some circumstances, we may be required to share information with the following organisations:

- HMRC
- Employee benefit schemes
- Disclosure Scotland (in relation to PVG checks)
- Companies House
- OSCR (Scottish Charities Regulator)
- Data processors (eg. in relation to payroll and pension schemes)
- External auditors
- Suppliers and service providers

ACC will not sell or rent your information to third parties, nor shall we share information with third parties for marketing purposes.

## **What are your privacy rights?**

Data Protection Laws give you a number of rights as set out below.

- Access: you may request access to a copy of your personal information.
- Withdraw Consent: where our processing of your personal information is based on your consent, you can withdraw your consent at any time.
- Rectification: you may ask us to rectify any inaccurate information we hold about you.
- Erasure: you may ask us to delete the personal information we hold about you, where there is no reason for us to continue to hold your information.
- Portability: you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or you can ask us to send your information in this format to another controller.
- Object: you may object to our processing of your personal information.
- Restriction: you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

If you would like to exercise any of your rights, please contact us in writing.

## **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO. The ICO's address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

The Privacy Notice for Staff and Volunteers was approved by the Board of Directors of ACC on 5<sup>th</sup> February 2026 and will be reviewed either on 5<sup>th</sup> February 2027 or an earlier date if a change to legislation or practice with respect to Data Protection is brought to the attention of the Board.

#### Document version control

| <b>Version number</b> | <b>Change or update</b> | <b>Author or owner</b> | <b>Date</b>                   |
|-----------------------|-------------------------|------------------------|-------------------------------|
| 1.0                   | First version           | Roslyn Clarke          | December 2020                 |
| 2.0                   | Updated version         | MM                     | 5 <sup>th</sup> February 2026 |
|                       |                         |                        |                               |