



UK Atomic
Energy
Authority

PRIVACY NOTICE FOR UKAEA EMPLOYEES, WORKERS AND CONTRACTORS

CONTENTS

Clause	Heading	Page
1	INTRODUCTION	1
2	THE KIND OF INFORMATION WE HOLD ABOUT YOU	1
3	HOW YOUR PERSONAL INFORMATION IS COLLECTED	1
4	HOW WE WILL USE INFORMATION ABOUT YOU	1
5	DATA SHARING	2
6	DATA SECURITY	3
7	DATA RETENTION.....	3
8	YOUR DUTY TO INFORM US OF CHANGES.....	3
9	YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION.....	3
10	HOW TO OBTAIN MORE INFORMATION ABOUT YOUR RIGHTS	4
11	CHANGES TO THIS PRIVACY NOTICE	4

1 INTRODUCTION

- 1.1 We are committed to protecting the privacy and security of your personal information.
- 1.2 This privacy notice describes how we collect and use personal information about you during and after your working relationship with us.
- 1.3 This notice applies to current and former employees, workers and contractors engaged by UKAEA. This notice does not form part of any contract of employment or other contract to provide services and we may update or amend this notice at any time.
- 1.4 For more information about our approach to data protection, please see our other procedures and guidance, which can be accessed through our intranet or by contacting the Data Protection Officer: dataprotection@ukaea.uk.
- 1.5 The contents of this privacy notice is overseen by our Chief Financial Officer, whose name and contact details are contained on the UKAEA UK Gov webpage or can be contacted using this email address: dataprotection@ukaea.uk.

2 THE KIND OF INFORMATION WE HOLD ABOUT YOU

- 2.1 We may collect, store, use and share information about you in order to carry out our activities as a business and our obligations as an employer. In particular, we will process personal data for the purposes of complying with legal obligations, performing the contract we have entered into with you, pursuing our legitimate interests (or those of a third party), where you have consented to it or where the law otherwise permits or requires it.
- 2.2 We may also use your personal information where we need to protect your interests (or someone else's interests) or where it is needed in the public interest, but this is likely to be rare.
- 2.3 The table at Schedule 1 sets out the type of information we may collect and what it may be used for.

3 HOW YOUR PERSONAL INFORMATION IS COLLECTED

- 3.1 We collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.
- 3.2 We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

4 HOW WE WILL USE INFORMATION ABOUT YOU

- 4.1 Most commonly, we will use your personal information in the following circumstances:
 - (a) where we need to perform the contract we have entered into with you;
 - (b) where we need to comply with a legal obligation;
 - (c) where we consider it necessary for our legitimate interests (or those of a third party).
- 4.2 If you have previously consented to us processing your personal data in general terms in your employment contract (or equivalent contract of engagement), we will no longer seek to rely on that consent.
- 4.3 As mentioned above, the table at Schedule 1 sets out the type of information we may collect and what it may be used for, but some of the grounds for processing referred to in

that table will overlap and there may be several grounds which justify our use of your personal information.

- 4.4 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).
- 4.5 Please note that we may process your personal information without your knowledge or consent, in accordance with this privacy notice, where this is required or permitted by law.
- 4.6 Data protection legislation identifies certain “special categories” of data, including information about race or ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, medical conditions, genetics, biometrics and criminal convictions. We may use such information in the following ways:
- we may use information relating to leave of absence, which may include sickness absence or family related leave, to comply with employment and other laws;
 - we may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits;
 - we may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;
 - we may use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations;
- 4.7 We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with details of the information that we would like and the reason(s) we need it, so that you can consider whether you wish to consent.
- 4.8 We will usually only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally permitted to do so. Where appropriate, we may collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you or others in the course of you working for us.
- 4.9 We may use automated profiling as part of our recruitment process, and only in certain circumstances. The data subject will be informed when profiling will be used.

5 DATA SHARING

- 5.1 We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.
- 5.2 “Third parties” includes third-party service providers (including contractors and designated agents), [*customers or prospective customers*] and other entities within our group.
- 5.3 The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration.

- 5.4 We will share your personal information with other entities in our group, as part of our regular reporting activities on company performance and business planning, for system maintenance support and for hosting of data.
- 5.5 We may also share your personal information with other third parties, for example the Disclosures and Barring Service, or if a business transfer or change of business ownership takes place or is envisaged. In addition, we may need to share your personal information with a regulator or otherwise to comply with the law.
- 5.6 Our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 5.7 We may transfer personal information about you outside of the European Economic Area (EEA). To ensure that your personal information receives an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

6 DATA SECURITY

- 6.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we aim to limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

7 DATA RETENTION

- 7.1 We will only retain your personal information for as long as we consider it necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. UKAEA has set out retention periods in the Retention Schedule, which can be provided upon request.
- 7.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the applicable legal requirements and other factors that we consider relevant.
- 7.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 7.4 Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention schedule.

8 YOUR DUTY TO INFORM US OF CHANGES

- 8.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

9 YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

- 9.1 Under certain circumstances and subject to certain conditions, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
 - **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - **Request the transfer** of your personal information to another party.
- 9.2 You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.
- 9.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 9.4 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing. To withdraw your consent, please contact dataprotection@ukaea.uk . Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10 HOW TO OBTAIN MORE INFORMATION ABOUT YOUR RIGHTS

- 10.1 If you have any questions or concerns about how we handle your personal information, please contact dataprotection@ukaea.uk .
- 10.2 If you are unsatisfied with our response to any data protection issues you raise with us, you have the right to make a complaint to the Information Commissioner’s Office (ICO). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.

11 CHANGES TO THIS PRIVACY NOTICE

- 11.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Schedule 1

TYPE OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING	WHAT IT MAY BE USED FOR
Personal contact details such as name, title, address, telephone numbers and personal email address	Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party) Compliance with our legal obligations	To contact you, to verify your identity, to administer our contract with you and to administer benefits
Date of birth	Compliance with our legal obligations [Performance of the contract we have entered into with you] Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, to ensure compliance with our legal obligations, and for business management and planning
Gender	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations
Emergency contact information	Fulfil our legitimate interests (or those of a third party) Protection of your interests	To contact your next of kin in the event of an emergency
Marital/civil partnership status and dependants	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, to ensure compliance with legal obligations, to administer benefit schemes
Government identification numbers [(e.g. social security, national insurance, driving licence, passport)]	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To verify your identity, to administer payroll and benefits accurately, and to comply with our legal obligations

Bank account details, payroll information and tax status information	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To pay you and ensure compliance with legal obligations
Salary, leave and benefit information and records (including pensions information)	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To monitor and administer your salary and benefits, and for business management and planning
Employment records (including job titles and work history)	[Compliance with our legal obligations] Fulfil our legitimate interests (or those of a third party)	To ensure and evidence suitability for your role and for business management and planning
Performance and conduct information	[Performance of the contract we have entered into with you] [Compliance with our legal obligations] Fulfil our legitimate interests (or those of a third party)	To monitor, assess and improve workplace performance and conduct and for business management and planning
Start date	Compliance with our legal obligations Performance of the contract we have entered into with you Fulfil our legitimate interests (or those of a third party)	To ensure your employment rights are honoured, to ensure you receive the correct benefits and to monitor your length of service
Education and training records	[Compliance with our legal obligations] Fulfil our legitimate interests (or those of a third party)	To ensure you have and maintain the correct qualifications and skills to perform your role

Professional membership records	Compliance with our legal obligations [Performance of the contract we have entered into with you] Fulfil our legitimate interests (or those of a third party)	To ensure you have the relevant memberships required or desirable in order to perform your role
References, CVs, cover letters and work history	[Compliance with our legal obligations] Fulfil our legitimate interests (or those of a third party)	To ensure and evidence your suitability for your role
Proof of work eligibility	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure you have the right to work in the UK
Photograph	Fulfil our legitimate interests (or those of a third party)	To verify your identity [<i>and to market our services to our customers and clients</i>]
Location data (through building entry/exit records)	Fulfil our legitimate interests (or those of a third party) Protection of your interests	To ensure building security
IT records (including information about your use of our information and communication systems)	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure network and information security and, if necessary, to detect and prevent inappropriate usage
Telephone records	Compliance with our legal obligations Fulfil our legitimate interests (or those of a third party)	To ensure network and information security and, if necessary, to detect and prevent inappropriate usage
Race or ethnic origin	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment Necessary for the establishment, exercise or defence of legal claims Fulfil our legitimate interests (or those of a third party)	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations

	Compliance with our legal obligations	
Health records	<p>Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment.</p> <p>Necessary for the establishment, exercise or defence of legal claims.</p> <p>Necessary for the purposes of preventive or occupational medicine, and/or for the assessment of the working capacity of the employee.</p> <p>Fulfil our legitimate interests (or those of a third party)</p> <p>Compliance with our legal obligations</p>	To ensure employee safety in the workplace and to provide appropriate workplace adjustments
Attendance records	<p>Compliance with our legal obligations</p> <p>[Performance of the contract we have entered with you]</p> <p>Fulfil our legitimate interests (or those of a third party)</p>	To monitor attendance levels, to ensure employee safety in the workplace and to provide appropriate workplace adjustments
Disciplinary and grievance records and information	Fulfil our legitimate interests (or those of a third party)	To monitor and, if necessary, address your conduct and any grievances
Biometric data	<p>Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment</p> <p>Explicit consent</p> <p>Fulfil our legitimate interests (or those of a third party)</p>	For network and information and security protocols.
Sexual orientation	Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection	For equal opportunity monitoring and reporting, and to ensure compliance with our legal obligations

	<p>with employment.</p> <p>Necessary for the establishment, exercise or defence of legal claims</p> <p>Fulfil our legitimate interests (or those of a third party)</p>	
Trade union membership	<p>Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment.</p> <p>Necessary for the establishment, exercise or defence of legal claims</p> <p>Fulfil our legitimate interests (or those of a third party)</p>	For trade union administration and to ensure compliance with our legal obligations
CCTV footage	Fulfil our legitimate interests (or those of a third party)	To ensure building security and monitor operational or construction activities.
Criminal records checks	<p>Necessary for the purposes of performing or exercising obligations or rights which are imposed on the employer or employee in connection with employment</p> <p>Fulfil our legitimate interests (or those of a third party)</p> <p>Compliance with a legal obligation</p>	To ensure and evidence your suitability for your role and to satisfy UK Government requirements