

## **North Lanarkshire Council Employee Service Centre**

### **Privacy Notices – Employee-Related Discount and Salary Sacrifice Schemes**

#### **Who we are?**

North Lanarkshire Council is a local authority constituted under the Local Government etc. (Scotland) Act 1994. Its head office is at Civic Centre, Windmillhill Street, Motherwell, ML1 1AB. North Lanarkshire Council is the data controller and responsible for your personal information.

#### **What is the purpose of this document?**

Under the UK General Data Protection Regulation (“UK GDPR”) individuals are entitled to be provided with “privacy information” when their personal data is collected and used. “Privacy information” tells the individual what information is being collected, the purposes for which it will be used and who it will be shared with. Providing this information is essential in order to comply with the obligation to use personal information in a transparent way under UK GDPR.

Privacy information is provided by a privacy notice. The Council necessarily requires to process personal data relating to employees who wish to benefit from employee discounts and for the purposes of participation in salary sacrifice schemes offered by the Council. This notice provides information to employees who participate, or are considering participating, in these schemes with information about how their personal data will be collected, used or shared (“processed”) for such purposes.

#### **Edenred/RewardGateway Employee Related Discounts**

By going into “MyLifestyle Hub” within MyNL, employees are able to access Edenred/RewardGateway Employee-Related offers and discounts. Edenred/RewardGateway are a registered company that provides employee staff discounts services to business. In order to allow Edenred/RewardGateway to provide employees with access to these incentives, the Council are required to provide Edenred/RewardGateway with certain details of employees who wish to take advantage of discounted goods and services. The personal data in question is restricted to the name of the employee and their payroll reference number. This personal data is provided by NLC to Edenred/RewardGateway via “GoAnywhere” secure data transfer software. This is the minimum level of personal data necessary for providing employees with access to these discounts and no further personal data about employees is provided for this purpose. Employees will be able to access Edenred/RewardGateway’s own privacy notice when through their website on My Lifestyle Hub.

#### **Cycle2Work**

The Council's People Resources Team operate a Salary Sacrifice Scheme under which employees can benefit from certain goods and services. As part of this, the Council participates in the Cycle2Work Scheme, which allows employees to enjoy tax savings on new bicycles. The Cycle 2 Work scheme platform also sits within My Lifestyle Hub. Edenered/Reward Gateway will periodically provide the Council with information about employees participating in the scheme which confirm the employee's name and employee payroll number relevant salary sacrifice for the purposes of salary deduction.

## **The Green Car Scheme**

The Council has also introduced a Green Car Salary Sacrifice Scheme for employees. This will support employees across all our Services to access the latest green energy car in line with our ambitions to have a net zero target for 2030, as set out in the Climate Plan ACT2030, whilst maximising their income and enhancing personal financial wellness. This will also contribute to minimising the organisational CO2 footprint and that of the local area. Use of the car may be made by the employee and any named drivers (third parties) nominated by the employee, subject to acceptance.

In line with our Workforce for the Future Strategy, we are committed to maintaining an employee benefits package that is valued and supports us to attract, retain and engage our staff. It is also important that our employee benefits package is aligned to our ambition and priorities, workforce policies and management practices..

The provider of the Green Car Scheme is Tusker Direct Limited (Company No. 03864648), Building 4, Hatters Lane, Croxley Green Business Park, Watford, Hertfordshire, Wd18 8YF. Employees should be aware that, by participating in the Green Car Scheme, their personal data, and that of any nominated named driver of the vehicle, will require to be shared by the Council with Tusker or provided directly to them by the employee. Where necessary, this will include sensitive or special category data. The employee should make any proposed named driver of the vehicle aware that their personal data will be processed for purposes related to their use of the car under the scheme. Employees will be required to provide personal data directly to Tusker (the provider of vehicles under the scheme) for the purposes of any application process. The Council's Employee Service Centre Operations Team will require to do an initial check on the accuracy of the data, as part of the application process. Employees will also be required to provide personal data directly to Tusker for the purposes of insurance of the vehicle. This will include provision of any necessary criminal conviction data. Such data will be provided direct to the provider (Tusker) without NLC having, or requiring access to, such data. Tusker are also a registered data controller and will provide data subjects (applicants for the scheme) with relevant privacy information. Tusker's privacy notice is located on their website and can be viewed here (*insert link*).

Monthly reports will be supplied by Tusker to the Council via Secure File Sharing Software "GoAnywhere". These reports will contain details of any agreed salary sacrifice and also any parking offences and fines. This data will necessarily be accessed by the Employee Service Centre Operations team for the purpose of any applicable salary deductions. Employee

personal data will be retained in accordance with standard protocols for iTrent employee records.

Employees who enter into the Green Car Scheme do so for an agreed specified period. In certain circumstances, employees may be entitled to terminate the Agreement earlier. This may be on the basis of illness or other qualifying grounds. Full details are provided in the **Lifestyle Agreement** as part of the user application process. The Council will be required to process special category personal data about the employee of their proposed named driver for such purposes.

### **The Type of Personal Data Processed**

- Name
- Address
- Contact telephone number
- Email address
- Payroll number
- Job title
- Annual salary
- National Insurance Number
- Date of birth
- Driver licence details
- Car scheme salary sacrifice amount (gross and net)
- Car scheme benefit in kind payment
- Car scheme car registration

Where necessary or required under the Green Car Scheme Lifestyle Agreement:

- medical information relevant to the car scheme
- a MAT B1 form or Adoption Approval Letter
- after a period of long term sick a copy of employee's doctor's 'fit note'
- details of accidents recent or within last three years
- motoring convictions, no more than two CAT A convictions in the last three years beginning with the code (CU,LC,MW,PC,SP,TS)

-non-motoring conviction, not spent under the Rehabilitation of Offenders Act

### **Lawful Basis for Processing of Personal Data for the Purposes of Employee-Related Discounts and Offers and Salary Sacrifice Schemes**

Article 6(1)(b) Contract – the processing is necessary for a contract the data controller has with the individual, or because they have asked for specific steps to be taken before entering into a contract. The Salary Sacrifice scheme for provision of vehicles for use by employees involves a formal variation to the applicant's contractual conditions of employment.

Article 6(1)(f) Legitimate interests: the processing is necessary for the data controller's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Special Categories of Personal Data and Criminal Convictions, etc Data – Article 9(2)(b)  
DPA 2018 Schedule 1 Part 1 Paragraph 1(a) – Processing is necessary for the purposes of carrying out obligations and exercising specific rights of the controller or of the data subject in the field of employment.

The Council are committed to protecting the privacy and confidentiality of any personal information that we hold. We will ensure that your personal information is kept secure, in line with the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018. We will only collect the minimum information necessary to fulfil a particular purpose; when we don't have a need to keep information about you, it will be disposed of in a secure manner.

Further information about how the Council processes personal data relating to employees, including rights of access under the Data Protection Act 2018, can be found in the Employee Service Centre Privacy Notice which can be found [here](#).