

SWAP Internal Audit Services – Privacy Policy

How we use your information – The purpose of this notice is to inform you about what to expect when we collect personal data. We will collect personal data about different types of people depending on your relationship with us.

Whenever we collect personal data we will ensure you are provided with a privacy notice which complies with data protection laws, there are a range of Privacy Notices below including:

- Partners and Clients
- Employees
- Suppliers
- Applicants

Access to personal data

We are committed to openness and transparency when it comes to people gaining access to their personal data. Individuals can find out if we hold any personal data by making a subject access request under data protection legislation. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form.

To make a request for any personal data we may hold you need to make a request in writing to;

The Company Secretary,
SWAP Ltd,
Ground Floor,
Blackbrook Gate 1,
Blackbrook Business Park,
Taunton,
Somerset,
TA1 2PX

You can also email us at enquiries@swapaudit.co.uk. You may be asked to provide proof of your identity and proof of your address as part of this process.

Changes to this privacy notice

We recognise that transparency and data protection are ongoing responsibilities therefore we will keep this privacy statement under regular review.

This privacy policy was last modified on 26th September 2023.

SWAP Internal Audit Services – Partner/Client Privacy Notice

SWAP is committed to complying with its obligations under the Data Protection Act to protect the confidentiality, integrity, and availability of personal data we process on your behalf as a Partner/Client. This privacy notice explains why we process personal data and what we do to keep it secure. It should be read in conjunction with the SWAP Privacy Policy as above.

Introduction

As part of your relationship with us, SWAP have a responsibility to our Partners/Clients about personal data and will only collect and use this personal data in ways which are compliant with data protection legislation.

To enable services to be delivered effectively, SWAP processes personal data on behalf of its Partners/Clients and acts as a 'data processor'.

SWAP also processes personal data about their Partners/Clients and the people who work for them. In this respect, SWAP is therefore a 'data controller'. This means that we determine the purposes and way the personal data is processed.

Legal basis for processing

Processing of your personal information is necessary for the performance of our contractual obligations and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

SWAP also plays a role in helping its Partners/Clients who have a legitimate interest and processing is necessary to carry out a task in the public interest or the exercise of the Partners/Clients official authority (as required by law to protect the funds they administer acting in the interests of their stakeholders).

What information does SWAP process and how?

To deliver the services for our Partners/Clients, SWAP processes personal data, including some special category data. Names, contact, and address details are recorded on SWAP's databases, but we only process personal data that is necessary to deliver our services.

SWAP makes every effort that all the data supplied to us by our Partner/Clients is anonymised at source.

However, on a very limited basis, we do need to process personal data about our Partner/Clients and the people who work for these Partner/Clients to ensure the efficient and effective delivery of our services.

The information we process may include, but is not limited to: -

- Personal identifiers (names, post titles etc) and other contact information (work email addresses and telephone numbers).

The personal information may relate to councillors, directors, trustees, employees and/or agents of our Partner/Clients. The information is collected directly from our Partner/Clients or from other public sources (for example organisational websites, published documents and social media i.e. LinkedIn) as part of the delivery of services.

What is Personal Data?

Personal data is any information that relates to or can be used to identify a living individual. For example, this could be names and contact details.

What is 'Special Category' Personal Data?

Some personal data is more sensitive and therefore needs extra protection to keep it safe. It is often information that is very personal to the data subject, such as:

- Sexuality or sex life
- Race or ethnicity
- Physical or mental health
- Political views
- Trade union membership
- Biometric data
- Criminal history

Who has access to your information?

We take the security of all the personal data we process very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality, and information security. We also regularly review the appropriateness of the measures we have in place to keep the data we hold secure. SWAP employees may only access personal data if they require it to deliver a service to our Partners/Clients.

We ensure that SWAP employees authorised to access your Personal Data are subject to obligations of confidentiality and receive training to ensure compliance with this Privacy Statement and the Data Protection Laws.

Who else do we share personal data with?

To support the delivery of services to our Partners/Clients, SWAP uses several third-party organisations to provide specific functions and services.

For example: -

- The IT support service is provided by Perspicuity, the website is hosted by Yell.com. These organisations may have access to the personal data we are holding to complete their work
- AuditBoard (our internal audit management system) and Microsoft 365
- SWAP's accountants, auditors, insurers, legal advisors, and Data Protection Officer may also have access to the personal data we are holding. For example, we may need to disclose personal data to our insurers in the event of a claim

SWAP may also be required to share the personal data we are holding with other organisations. This could be because of a legal requirement or a court order. For example, SWAP may need to share information with the police, government departments or other agencies to help prevent or detect a crime. We will only share personal data in such circumstances where there is a legal or regulatory duty

to do so. We will also keep a record of what personal data has been disclosed and the lawful basis for that information being shared.

SWAP does not share personal information about our Partners/Clients with other parties unless the information is already in the public domain.

Where SWAP uses a third-party organisation, we ensure contractual agreements and appropriate security measures are in place to keep the personal data secure.

Who else do we share anonymised data with?

- Other audit Partners within SWAP. When Partners take part in a benchmarking exercise, we could share the findings of our work (which will be anonymised) across our Partners.
- Other Regional Groups, e.g. Midland Audit Group
- LACAN (Local Authority Chief Internal Auditors Network)
- SWAP News Roundup

How long is information relating to personal data kept for?

SWAP will only keep personal data for as long as it is required to fulfil a legal / contractual obligation or if we have an organisational need to do so. Where SWAP is acting as a data processor, agreements are in place with our Partners/Clients setting out how long we should keep different categories of personal data. SWAP maintains a document retention and disposal schedule which sets out the time period information is kept for.

Do we transfer your personal data outside of the EEA (European Economic Area)?

Your personal data which SWAP processes is all held within the EEA. If the need should arise to send personal data out of the EEA, we will ensure it has extra protection from loss or unauthorised access. We will only process your information overseas where the country it is transferred to has adequate data protection measures in place or where the suppliers are bound by model contract security clauses or where the supplier has signed up to an approved certification scheme or where requested by an external organisation under a legal requirement or at your request.

Concerns

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our Data Protection Officer (Company Secretary), contact details can be found above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection regulator) about the way in which SWAP has handled your personal data. You can do so by clicking on the following [link](#).

SWAP Internal Audit Services – Applicants Privacy Notice

This Privacy Notice is designed to help applicants to understand how and why we process their personal data. It also informs them of their information rights, and should be read in conjunction with the SWAP Privacy Policy as above.

Introduction

This is a specific privacy notice on the collection and processing of personal data by SWAP Internal Audit Services. As part of our recruitment process, we have a responsibility to applicants with regard to their personal data and will only collect and use this personal data in ways which are compliant with data protection legislation.

What information does SWAP collect and how?

We process information about applicants to recruit suitable people for job roles within SWAP. The information we process may include, but is not limited to:

- Your name, address, date of birth, National Insurance number, email address and telephone numbers
- Details of your qualifications, skills, experience, membership details for professional bodies, and employment history
- Information gathered from interviews and phone-screenings you may have
- Reference details and information provided by referees
- Information about gender, ethnicity, sexuality, religion, age and disability status, (for the purposes of diversity and equality monitoring)
- Information about an applicants' right to work in the United Kingdom (which is a legal obligation)

We may collect this information in a variety of ways. For example, data might be contained in CVs (including when these are sent to us as part of speculative applications or enquiries), obtained from your passport or other identity documents, or collected through interviews or other methods of assessment.

Legal basis for processing

Most personal information is processed to comply with legal obligations. SWAP has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

We process personal data for equality and disability monitoring based on one or more of the following legal bases:

- Consent (where applicable)
- Compliance with a legal obligation
- Legitimate interests in promoting equality and diversity

Who has access to your information?

Information will typically be made available to relevant members of the Senior Leadership Team, recruitment panel members and head office personnel.

How long is information relating to applicants kept for?

If your application for employment is unsuccessful (including when you have speculatively applied by sending in your CV), we will hold your data on file for 6 months. At the end of that period, your data is deleted or destroyed (unless we retain it for longer as agreed with yourself).

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which employee data is held will be provided to you in a separate privacy notice.

Who else do we share personal data with?

SWAP does not share personal information about applicants with other parties, other than consultants commissioned by SWAP to assist with recruitment or bodies charged with a monitoring or inspection role in application of EU/UK law, e.g. auditors.

Do we transfer your personal data outside of the EEA (European Economic Area)?

The personal data that SWAP processes is all held within the EEA. If the need should arise to send personal data out of the EEA, we will ensure it has extra protection from loss or unauthorised access.

We will only process your information overseas where the country it is transferred to has adequate data protection measures in place or where the suppliers are bound by model contract security clauses or where the supplier has signed up to an approved certification scheme or where requested by an external organisation under a legal requirement or at your request.

Concerns

If you are an applicant and have any concerns about the way we have handled your personal data or would like any further information, then please contact our Data Protection Officer (Company Secretary), contact details can be found above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection regulator) about the way in which SWAP has handled your personal data. You can do so by clicking on the following [link](#).

SWAP Internal Audit Services - Suppliers Privacy Notice

This Privacy Notice is designed to help our suppliers to understand how and why we process their personal data. It also informs them of their information rights, and should be read in conjunction with the SWAP Privacy Policy.

Introduction

This is a specific privacy notice on the collection and processing of personal data by SWAP Internal Audit Services. Part of our procurement activity will include the holding of supplier data, supplier analysis, evaluation of tenders, and other market engagement processes. We have a responsibility to our suppliers and their personal data and will only collect and use this personal data in ways which are compliant with data protection legislation.

What information does SWAP process and why?

To ensure the effective supply of goods and services, we process information about our suppliers and the people who work for them. The information we process may include, but is not limited to:

- Personal identifiers (names, post titles etc)
- Other contact information (work email addresses and telephone numbers). The information is collected directly from our suppliers or from other public sources (for example organisational websites and published documents).
- Contact details of suppliers and bidders, their staff, or sub-contractors such as their name, address, telephone number and email addresses
- Bank account details and where applicable your VAT number
- Financial turnover/accounts
- Evidence of Insurances held
- Any other information gathered from procurement activity
- Social Media information, i.e. LinkedIn

Where does SWAP get your information from?

- Completion of Supplier Creation Form
- Tender/quotation documents
- Social Media information, i.e. LinkedIn

Legal basis for processing

Most personal information is processed to comply with a legal obligation / necessity for the performance of the contract to which a tender is submitted.

When we ask you for your details, we will use one or more of the following reasons why we are asking for it:

- We need it to take steps (at your request) to enter a contract with you. For example we need to process company information to pay for products ordered.
- We need it to comply with a legal obligation, e.g. the obligation in relation to any goods provided to SWAP.

SWAP may also disclose information if we believe that disclosure of such information is helpful or reasonably necessary to:

- comply with any applicable law, regulation, legal process, or governmental request
- investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud, or security issues
- to establish or exercise our rights to defend against legal claims
- prevent harm to the rights, property or safety of us, our staff and third parties
- for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary to enforce intellectual property or other legal rights

Who has access to your data?

Information will typically be made available to those employees within SWAP who require it to manage the contracts with our suppliers.

Who else do we share personal data with?

SWAP does not share personal information about our suppliers with other parties, other than consultants commissioned by SWAP to assist with the delivery of services or bodies charged with a monitoring or inspection task in application of EU/UK law, e.g. auditors.

How long is information relating to suppliers kept for?

SWAP will only keep personal data relating to suppliers for as long as it is required to ensure they fulfil their contractual obligations or if we have an organisational need to do so. SWAP maintains a document retention and disposal schedule which sets out the period information is kept for.

Do we transfer your personal data outside of the EEA (European Economic Area)?

The personal data that SWAP processes is all held within the EEA. If the need should arise to send personal data out of the EEA, we will ensure it has extra protection from loss or unauthorised access.

We will only process your information overseas where the country it is transferred to has adequate data protection measures in place or where the suppliers are bound by model contract security clauses or where the supplier has signed up to an approved certification scheme or where requested by an external organisation under a legal requirement or at your request.

Concerns

If you are a supplier and have any concerns about the way we have handled your personal data or would like any further information, then please contact our Data Protection Officer (Company Secretary), contact details can be found above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection regulator) about the way in which SWAP has handled your personal data. You can do so by clicking on the following [link](#).

SWAP Internal Audit Services – Employees Privacy Notice

This Privacy Notice is designed to help employees to understand how and why we process their personal data. It also informs them of their information rights and should be read in conjunction with the SWAP Privacy Policy as above.

Introduction

As part of your relationship with us, SWAP have a responsibility to employees about their personal data and will only collect and use this personal data in ways which are compliant with data protection legislation.

What information does SWAP collect and how?

We process information about employees within SWAP, and the information we process may include, but is not limited to:

- Your name, address, date of birth, National Insurance number, email address and telephone numbers
- Details of your qualifications including copies of certificates, skills, experience, membership details for professional bodies, and employment history
- Information gathered from interviews and phone-screenings you may have
- Reference details and information provided by referees
- Information about gender, ethnicity, sexuality, religion, age and disability status, (for the purposes of diversity and equality monitoring)
- Information about an employees' right to work in the United Kingdom (which is a legal obligation)
- Personal interests (including potential conflicts of interest)
- Information about attendance, performance, and training
- Emergency contact information and dependants
- Financial information, including bank account details, HMRC information and pension contributions to facilitate salary payments and expense payments
- Photographs for use on ID pages, IT systems including Microsoft 365, our website and external marketing use
- Passport, Driving Licence, Birth Certificate
- Occupational Health
- [Disclosure and Barring Service](#) check and pre-employment health screening check
- For certain roles, it may be necessary to process information so that Police checks can be conducted
- Terms and Conditions of your employment
- Information about medical or health conditions, including whether you have a disability for which the organisation needs to make reasonable adjustments
- Details of trade union membership

We may collect this information in a variety of ways. For example, data might be contained in CVs, obtained from your passport or other identity documents, or forms completed by you at the start or during your employment.

In some cases, we collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from criminal records checks permitted by law.

Legal basis for processing

Most personal information is processed to comply with legal obligations. Examples include checking an employee's entitlement to work in the United Kingdom and complying with health and safety laws.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). Information about trade union membership is processed to allow us to deduct union subscriptions.

SWAP has a legitimate interest in processing personal data information relating to its employees in accordance with their contracts of employment, to ensure that obligations under the contract are met, and for keeping records of the process, for example, payroll processing.

Except for photographs for use on the SWAP website and on social media, the provision of the information outlined above is part of a contractual requirement. SWAP will obtain the consent of the employee before publishing their photographs or personal details on the website, social media, e.g. LinkedIn etc.

Please be aware that facial recognition is used as a security precaution to sign into your work laptop or work mobile.

We process personal data for equality and disability monitoring based on one or more of the following legal bases:

- Consent (where applicable)
- Compliance with a legal obligation
- Legitimate interests in promoting equality and diversity

Who has access to your information?

Your information will typically be made available to relevant head office personnel and your line manager. Perspicuity, SWAP's IT providers and Microsoft, along with AuditBoard employees (Audit Management System) require access to certain basic data necessary for the performance of their roles.

How long is information relating to personal data kept for?

We will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are set out in the relevant retention policy.

Who else do we share personal data with?

SWAP shares personal information about employees with other parties such as:

- Payroll services are provided by Somerset Council for payroll processing purposes.
- Pension services are provided by Somerset Council or The People's Pension.
- Information may be shared externally for the purpose of learning and development.
- Names, job titles, work email addresses and telephone numbers, and qualifications may be provided to existing and prospective clients to enable the effective provision of services. This could also include marketing activities and training events.
- Information relating to employees will be recorded on various systems e.g. Appogee, AuditBoard and Microsoft 365. The information typically includes names, job titles, work email addresses and telephone numbers, and photographs.
- [CSSC Scheme](#) (Civil Service Sports and Social Club)

In addition, we could also share your information with third parties depending on your personal circumstances but could include:

- Occupational Health
- Training Providers
- Edenred Childcare Vouchers
- Medicash
- Unison
- Suppliers (for example) hotels, transport, parcel delivery services
- Prospective future employers
- Landlords, letting agents, or mortgage brokers
- Health and Safety Executive

Do we transfer your personal data outside of the EEA (European Economic Area)?

Your personal data which SWAP processes is all held within the EEA. If the need should arise to send personal data out of the EEA, we will ensure it has extra protection from loss or unauthorised access.

We will only process your information overseas where the country it is transferred to has adequate data protection measures in place or where the suppliers are bound by model contract security clauses or where the supplier has signed up to an approved certification scheme or where requested by an external organisation under a legal requirement or at your request.

Concerns

If you are an employee and have any concerns about the way we have handled your personal data or would like any further information, then please contact our Data Protection Officer, contact details can be found above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection regulator) about the way in which SWAP has handled your personal data. You can do so by clicking on the following [link](#).

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