

	Employee Privacy Notice	DOC	BAC
		EFF	01 October 2023
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Employee Privacy Notice

1. Overview

- 1.1 Pursuant to Section 1 of the Data Protection Act, the Botswana Accountancy College “BAC” is a Data Controller for prospective, current, and former employees of the College.
- 1.2 This privacy notice explains how the College collects, uses, and shares personal data of its employees and prospective employees.
- 1.3 Your personal data will be processed in accordance with the Data Protection Policy and this privacy notice as revised from time to time.
- 1.4 This notice also explains how you may control the use of your personal data in accordance with your rights under Section 30 of the Data Protection Act.
- 1.5 BAC maintains information about you in paper and electronic form, which is kept across the College’s departments and Schools for the administration of your employment and to comply with certain statutory obligations.
- 1.6 The College will at all times strive to ensure that your personal data is accurate and up to date, hence it is important that you always inform the College of any changes in your personal data and/or update your personal information.

2. How the College collects your personal data

- 2.1 You provide data to the College through the application process, either via direct submission of an application, or a third party acting on your behalf to submit applications to work for the College.
- 2.2 Data may also be collected from third parties like recruitment agencies with whom you would have shared your personal data (curriculum vitae) for the purposes of job hunting.
- 2.3 The College further collects or update your data once you have been engaged as an employee either through requests from Human Resources Department or through your own updates submitted to the College, or via transactional activities as part of your employment and your engagement with college services.

3. Personal Data Collected and Processed by the College

3.1 To carry out its human resources management activities and obligations as an employer, the College may collect, store and process the following categories of personal data for the purpose of administering the employment relationship with you:

Data Category	Examples
Administrative	Applications for employment (correspondence, references, copies of certificates of achievements), invitation to interviews, interview packs and report, offer letters, acceptance or rejection letters. Correspondence with or about you i.e. letters to you about a pay rise or, at your request, a letter to your service providers confirming your employment status or salary. Minutes of meetings.
Biographical	Date of birth, gender, marital status and dependents' names and ages, education, training and employment history, dates of study and examination results. nationality, Identity number, passport number, country of domicile and/or origin.
Compliance	Copies of work permits, residents permit required by the Ministry of Employment, Labour Productivity and Skills Development. Registration and/or accreditation with professional bodies or oversight authorities.
Contact	Name, title, addresses, telephone numbers, and personal email addresses
Financial	Banking details, salary, benefits, pension scheme registration and gratuity administration, superannuation and group insurance.
Grievance or Disciplinary	Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
Performance Management	Performance agreements and assessments of your performance
Security Data	CCTV images, security incident reports and IT system login and usage
*Special category ("Sensitive") Personal Data	Racial or ethnic origin, Religious beliefs, Trade union membership, Data concerning health (including disability), Sexual Orientation. Data relating to criminal convictions and offences.
Third Party	Next of Kin, Marital and dependent status.
Training and Development	Training and development records, professional membership records

4. How the College uses your personal data?

4.1 The College processes staff personal data in order to:

- i. administer payroll and pay your salary
- ii. Review performance
- iii. Provide training and development
- iv. Assess suitability for promotion
- v. Administer pensions, insurance, gratuities and other benefits
- vi. Monitor your attendance
- vii. Manage your access to the College's services and facilities
- viii. Publish online staff directories of basic contact details

5. What is the legal basis for processing your personal data?

5.1 The legal basis for processing personal data is the employment contract between the College and the individual employee.

5.2 As an applicant it is in your best interest to share your personal data with the College to enable it to consider you for any employment opportunity it may have.

5.3 Where processing is necessary for compliance with the College's legal obligations e.g. to comply with Employment Act, Botswana Qualifications Authority Act, No 24 of 2013 or Botswana labor laws.

5.4 The College is also legally obliged to collect, retain and disclose certain information about you, for example to ensure you pay the correct rate of taxation, to fulfil its statutory reporting duties and comply with other obligations.

5.5 Should the College wish to use your personal data for any purposes other than fulfil its legal or contractual obligations the legal basis for this would be your explicit consent, which you are free to withdraw at any time.

6. Sharing your personal data with third parties

6.1 Sometimes the College will pass information about you to third parties, where the law allows it. For example, the College may confirm the dates and nature of your employment to a prospective employer or law enforcement agency.

6.2 The College provide information to your service provider if you join a pension scheme or medical aid scheme or to fulfil its legal obligations.

6.3 Information is passed between various business units of the College for operational reasons.

6.4 Where sharing of personal information involves international transfer, information will only be transferred if it meets the conditions set down under the Data Protection Act.

7. How long does the College keep your personal data?

7.1 The College retains your personal data if you are its employee.

7.2 In the event you decide to leave the College's employment, your personnel file is kept for a period of 20 years after compulsory retirement age as outlined in the College's Records Retention and Disposition Schedule.

7.3 Unsuccessful applications will be retained for 6 months following the appointment of the substantive staff member.

7.4 The College will maintain a database of unsuccessful applicants for a period of 2 years.

8. Your rights and further information

8.1 Where the College is processing data based on your consent, you have the right to withdraw that consent at any time subject to meeting the data protection legislation requirements.

8.2 You have the right to access, rectify, object to processing and erase your personal information.

9. How to contact the College

9.1 Please contact us with any requests related to your personal information, or with any questions or queries you may have about this statement. Our email address is records@bac.ac.bw

9.2 If you are not satisfied with how the College manages your personal data, you have the right to make a complaint to the Information and Data Protection Commission.

10. Review of privacy notice

10.1 The College may review this privacy notice from time to time to meet personal data requirements

Gaborone Campus.
Plot 50661, Fairgrounds Office Park.
Private Bag 00319, Gaborone.

Francistown Campus.
Plot 31403, Moffat Street
Private Bag 137, Francistown