

Data controller: Housing Plus Group, Acton Court, Acton Gate, Stafford, ST18 9AP
Tel: 01785 312000

Data protection officer: Tony Price

Contact for all data protection queries: data.protection@housingplusgroup.co.uk

This privacy notice should be read in conjunction with the Group's corporate privacy policy which is available on the website at www.housingplusgroup.co.uk/privacy-policy

The Group collects and processes personal data relating to its employees to manage the employment relationship, to meet its statutory requirements and for the effective management of all employees and the business. The majority of the data which is processed is necessary to meet these purposes and in some cases is required by law.

The Group is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the Group collect and hold?

The Group collects and processes a range of information about you. This includes:

- ▶ your name, address and contact details, including personal email address and telephone number, date of birth and gender
- ▶ the terms and conditions of your employment
- ▶ details of your qualifications, skills, experience and employment history. This includes start and end dates with previous employers and contact details for your referees
- ▶ information about your entitlement to benefits such as pensions or insurance cover, annual leave entitlement and hours of work
- ▶ details of your bank account and national insurance number
- ▶ information about your next of kin and emergency contacts
- ▶ information about your nationality and entitlement to work in the UK
- ▶ information about your criminal record
- ▶ details relating to your pension membership and contribution levels
- ▶ details of your scheduled hours of work and attendance
- ▶ details of periods of leave you have taken. This can include holiday, sickness absence, family leave and sabbatical. It also includes the reasons for the leave, occupational health reports, GP reports and fit notes and any accident claim details
- ▶ details of any disciplinary or grievance procedures you have been involved in, including any warnings issued to you and related correspondence
- ▶ assessments of your performance including appraisals, performance reviews and training. It also includes performance improvement plans, in-house qualifications and evidence towards performance targets and external awards

- ▶ information about medical or health conditions, including whether or not you have a disability for which the Group needs to make reasonable adjustments
- ▶ details of trade union membership
- ▶ if you use one of our company vehicles these contain trackers and the whereabouts of the vehicle is recorded
- ▶ equal opportunities monitoring information including details about your ethnic origin
- ▶ information about the vehicle you drive for the purposes of work. This includes details of your car insurance and proof of a valid MOT

The Group collects this information in a variety of ways. For example, data is collected through application forms and CVs, obtained from your passport or other identity documents such as your driving licence and from forms completed by you at the start of or during employment. It is also collected from correspondence with you or through interviews, meetings or other assessments directly with the HR team, through your manager or other mechanisms, such as surveys.

In some cases, the organisation collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the Group's HR information management systems and in other IT systems including the Group's scanning and email system and the Care Plus CM2000 system.

Why does the Group process personal data?

The Group needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data in order to pay you in accordance with your employment contract and to administer any benefits, pensions and/or insurance entitlements.

In some cases, the Group needs to process data to ensure that it is complying with its legal and/or regulatory obligations. For example, it is legally required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the Group has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the organisation to:

- ▶ run recruitment processes
- ▶ maintain accurate and up-to-date employment records. This includes your contact details and information on who to contact in the event of an emergency. It also includes records of employee contractual and statutory rights
- ▶ operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
- ▶ operate and keep a record of employee performance and related processes, to plan for career development and for succession planning and workforce management purposes
- ▶ operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled. The Group will only collect data which is relevant for the purposes of processing your absence, you have the right

to refuse to give reasons for your sickness absence, however the Group may make decisions about your employment through the policies and procedures based on the information that is held and available

- ▶ obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law and ensure that employees are receiving the pay or other benefits to which they are entitled
- ▶ operate and keep a record of other types of leave including maternity, paternity, adoption, parental and shared parental leave, to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement and to ensure that employees are receiving the pay or other benefits to which they are entitled
- ▶ ensure effective general HR and business administration
- ▶ provide references on request for current or former employees
- ▶ respond to and defend any legal claims
- ▶ maintain and promote equality in the workplace
- ▶ operating exit interview questionnaires through third party companies where necessary, for workforce management purposes
- ▶ operate and keep a record of employee benefit selections through third party companies where necessary, to ensure the processing and payment of these benefits

Where the Group relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health, wellbeing or medical conditions, are 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 the Group to operate check-off for union subscriptions.

Where the Group processes other special categories of personal data, such as information about ethnic origin, gender and age, this is done for the purposes of equal opportunities monitoring, which is reported as required to board and regulators. Data that the Group uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

Who has access to data?

Your information will be shared internally, including with members of the HR and recruitment team, payroll, certain information with your line manager and managers in the business area(s) in which you work.

The Group shares your data with third parties in order to acquire pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service (DBS). The Group may also share your data with the provider of our HR information system in order to fix any errors. A data sharing agreement is signed by the HR information system provider, Civica, formerly known as Carval, to ensure they only use the system for the purposes of fixing the issue and that the system access is withdrawn once the system is fixed. The data is not kept by them and is transferred through a SFTP secure site. In all cases the data will be subject to a confidentiality agreement.

The Group also shares some information with third parties that process data on its behalf. This can relate to HMRC for payroll, the provision of benefits and the provision of occupational health services. Data is also shared with the Care Quality Commission (CQC) in the form of provider information returns which are a legal requirement for care providers. The Group also shares information with driving licence management companies, flexible benefits providers, solicitors in legal cases, pension providers and survey providers. Health and safety training records, incidents and accident reports are recorded to comply with Group policies, statutes and regulations, which may require disclosure of information to occupational health advisers and statutory bodies such as the Health and Safety Executive (HSE).

As part of your terms and conditions, the Group requests your cooperation in appearing in publicity activities or materials such as articles for its own publications and in the media. Any personal information contained in these articles will be confirmed with you by the marketing and communications team prior to going to print. Photographs will remain the copyright of the Group. If you do not wish to have images or details about yourself published, please make this known via an opt-out to the marketing and communications team.

We may also compile management information in relation to the business of the Group and anonymised statistical information for monitoring and statutory or regulatory returns.

The Group may disclose information to other parties if requested to do so. This can include a request by your bank or financial organisation regarding a mortgage or loan where evidence of your consent is provided, references for employment purposes or a request relating to the investigation of fraud and is required by the police or another authorised body.

There may be occasions where you choose to share confidential information about yourself with trade union representatives or colleagues to support you with employee relation matters. We will only share this information with your consent.

The Group will not transfer your data to countries outside the European Economic Area (EEA) unless it is satisfied that there is an adequate level of protection for the data in place.

Every third party provider has submitted the Group with a copy of their privacy notice to demonstrate their compliance with the regulations.

How does the Group protect data?

The Group takes the security of your data seriously and has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the performance of their duties. Access to data is protected by unique profiles for data use depending upon the need of the individual and is secure through password entry. The password entry systems are compliant with the Group's security processes.

Anyone permitted to view your data is aware of the need for confidentiality and proper use of personal information.

Where the Group engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. Such third parties will also be required to enter into an appropriate data sharing agreement.

How long does the Group keep data for?

The Group will hold your personal data for the duration of your employment and for a period of six years after your employment ends.

Recruitment application retention periods are for six months and then all documentation is disposed of securely unless you are employed into a position and then the above applies.

Retention periods are compliant with the National Housing Federation (NHF) schedule of retention.

Your rights

As a data subject you have a number of rights. These are:

- ▶ The right to be informed about what data is collected and how it is used. This notice helps comply with this right
- ▶ The right to request access to your data and other information held about you
- ▶ The right to have any mistakes or inaccuracies in your data put right
- ▶ The right to request the deletion or removal of data where there is no compelling reason for its continued use
- ▶ The right to restrict the processing of data where it is inaccurate or consideration of the lawful basis or legitimate interest is ongoing
- ▶ The right to portability, which ensures data is provided in a readily usable format
- ▶ The right to object to processing in certain circumstances such as direct marketing, profiling or scientific research
- ▶ The right to be informed about and object to data being used for some automated decision making, such as profiling

If you would like to exercise any of these rights, please contact the data controller via data.protection@housingplusgroup.co.uk. If you believe that the Group has not complied with your data protection rights, you can make a complaint to the Information Commissioners Office (ICO) via their website www.ico.org.uk or by calling **0303 123 1113**.

What if you do not provide personal data?

You have some obligations under your employment contract to provide the Group with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the Group with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details have to be provided to enable the Group to enter into a contract of employment with you. If you do not provide other information this will hinder the Group's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Automated decision-making

Employment decisions are not based solely on automated decision-making.

