

# Eildon Housing Association

## Fair Processing Notice

(How we use applicant / employee information)



This notice explains what information we collect, when we collect it and how we use it. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information. For the purpose of this notice an applicant is someone applying for any vacancy within Eildon, and an employee includes but is not limited to the following: anyone who works for Eildon, member of Eildon Housing Board, Work placement, Volunteer, and seconded staff.

Eildon Housing Association (“we” or “us”) is committed to protecting the rights of individuals with respect to the processing of their personal data. We adhere to the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 (applicable from the 25 May 2018), as well as any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7231896 and we are the data controller of any personal data that you provide to us.

Our Data & Information Officer is Kerry Allison. Any questions relating to this notice and our privacy practices should be sent to [CorporateServicesTeam@Eildon.org.uk](mailto:CorporateServicesTeam@Eildon.org.uk).

## 1. How we collect information from you and what information we collect

We may collect the following information from you through a variety of sources (i) directly from you; or (ii) third parties (including Employment Agencies, pensions service):

- Personal contact details such as name, title, address, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Copy of driving licence, car details and insurance documents
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Qualifications
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as ID swipe card records
- Information about your use of our information and communications systems
- Photographs

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your health, including any medical condition, health and sickness records, disabilities
- Information about criminal convictions and offences

## 2. Why we need this information about you and how it will be used

We collect and use the above information and personal data for:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting tax and National Insurance contributions
- Providing the Eildon's benefits to you
- Liaising with pension providers
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment
- Making arrangements for the termination of our working relationship
- Education, training and development requirements
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- Ascertaining your fitness to work
- Fraud prevention
- Monitoring your use of our information and communication systems to ensure compliance with our IT policies
- Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- Equal opportunities monitoring
- To comply with our duties as your employer

### **3. Sharing of your information**

We may disclose to and share information about you with third parties for the purposes set out in this notice, or for purposes approved by you, including the following:

- To process your monthly salary payments
- To allow your pension provider to process pensions information and handle your pension
- Providing the Eildon's benefits to you
- Managing sickness absence
- To conduct data analytics studies to review and better understand employee engagement, satisfaction, retention and attrition rates
- Complying with health and safety obligations
- Administering the contract we have entered into with you
- If we enter into a joint venture with, are sold to or merged with another business entity, your information may be disclosed to our new business partners or owners
- To obtain employment law related advice

### **4. Transfers outside the UK and Europe**

Your information will only be stored within the UK and the EEA. We will not transfer your personal information out with these areas without making you aware.

### **5. Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe. As we hold your information both in paper format and electronically we have several different ways to ensure security measures are in place.

Personal information that we hold in paper format for you is kept in cabinets that are locked at the end of each working day.

The information that we hold about you electronically is protected in several ways:

- No access to the network unless the correct username and password are entered
- All Eildon electronic devices (tablets, notebooks, phones etc.) are encrypted
- Data Loss Prevention software
- A range of cybersecurity measures
- Anti-virus software
- Policies and procedures, information and training for staff

## 6. How long we keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law, or as set out in any relevant contract we have with you.

Data retention guidelines on the information we hold is provided in our Document Retention Schedule on the Intranet, which staff have access to, alternatively a hard copy can be requested.

## 7. Your Rights

You have the right at any time to:

- Ask for a copy of the information about you held by us in our records
- Object to, or ask us to restrict, the processing of your personal data
- Require us to correct any inaccuracies in your information
- Make a request to us to delete what personal data of yours we hold

If you would like to find out more about how we use your personal data or would like to see a copy of the information that we hold about you or wish to exercise any of your above rights, please contact: **Data and Information Officer, Eildon Housing Association, The Weaving Shed, Ettrick Mill, Dunsdale Road, Selkirk, TD7 5EB** or email us on [CorporateServicesTeam@Eildon.org.uk](mailto:CorporateServicesTeam@Eildon.org.uk).

You have the right to complain to the Information Commissioner's Office in relation to our use of your information.

The accuracy of your information is important to us – please help us to keep our records updated by informing HR of any changes to your personal circumstances such as change of address, telephone numbers, emergency contact details, bank details, criminal convictions, loss of driving licence or other relevant licence or work permit.