Fair Processing Notice

How we use employee and job applicant information

This notice explains what information we collect, when we collect it and how we use this. 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.

1. Castlehill Housing Association is committed to protecting the rights of individuals with respect to the processing of their personal data and adhere to the UK GDPR and Data Protection Act 2018, together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

We are registered as a Controller with the Office of the Information Commission (IC) under registration number Z734745X and we are the controller of any personal data that you provide to us.

Our Data Protection Officer is Alison Watson.

Any questions relating to this notice and our privacy practices should be sent to Alison Watson at alison.watson@castlehillha.co.uk

2. We collect the following information from you through a variety of resources (i) directly from you; or (ii) from third parties (including Employment Agencies, pensions service):
    (a) Name
    (b) Date of Birth
    (c) Address
    (d) Telephone Number
    (e) E-mail address
    (f) NI number
    (g) Bank account details
    (h) Emergency contact details
    (i) Qualifications and training records
    (j) Performance Management records
    (k) Absence information
    (l) Occupational Health Assessments
    (m) Personal characteristics such as gender and ethnic group
    (n) Forms of identification (Driving Licence/Passport)
    (o) Records of meetings held in relation to the application of Castlehill policies and procedures
    (p) For relevant posts only - Criminal record information

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

a. Administration of contracts of employment
b. Application of our HR policies & procedures e.g. absence, appraisal, learning and development and disciplinary and grievance procedures
c. Payment of salaries
d. Recruitment and selection
e. Pensions and associated benefits
f. Membership of professional bodies
g. Operation of our lone workers' security scheme
h. Compliance with reporting requirements from external regulators e.g. the SHR & Care Inspectorate

3. We may disclose 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
- To allow our lone workers' security scheme partners to take any necessary security action on your behalf
- If we enter into a joint venture with or are sold to, or merge with another business entity, your information may be disclosed to our new or prospective business partners or owners
- To allow us to issue Regulator annual returns
- With our internal and external auditors, depending on the scope of the audit
- With external training providers or professional bodies to either aid with your learning and professional development, or to comply with legislative requirement e.g. SSSC
- If we need to communicate with you by post, information will be shared with our contracted mail services provider, who will electronically receive, print and post the document(s) to you
- If we are investigating a complaint, information may be disclosed to Scottish Public Services Ombudsman
- *For relevant posts only* - With Companies House and/or regulators including OSCR in relation to the status and governance of the Association.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

4. Your information is only stored within the UK. If we are required to transfer information outside the UK, we ensure there are adequate safeguards in place to protect your information in accordance with this notice, including ensuring there is a Commission adequacy decision in place for the recipient country.

5. When you give us information we take steps to make sure that your personal information is kept secure and safe. Your personal information is kept securely in either paper or electronic form and can only be viewed by appropriate people such as line managers for ongoing management, HR and Finance staff and, if you are on the lone workers scheme, senior staff who manage the lone worker system.

6. 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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you. Data retention guidelines on the information we hold are provided in our Data Protection Policy.

7. You have the right at any time to:
    - Ask for a copy of the information about you held by us in our records;
    - Require us to correct any inaccuracies of factE in your information;

- Request that we restrict your data processing or object to our processing in certain circumstances;
- Make a request to us to delete what personal data of yours we hold;
- Request to obtain and reuse your personal data for your own purpose (data portability);
- Object to receive any marketing communications from us and
- Submit a complaint to us if you believe your personal data has been handled in a way that does not comply with data protection law.

These rights are qualified and are not absolute.

In addition you have certain rights where we use automated decision making in respect of you or your personal data (and will inform you of any such processing and those rights should we use any such processes.

If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold or wish to exercise any of your above rights, please contact: Alison Watson.

If you have any complaints about the way your data is processed or handled by us, please contact Alison Watson.

If you remain unsatisfied after your complaint has been processed by us, you also have the right to complain to the Information Commission in relation to our use of your information. The Information Commission's contact details are noted below:
The Information Commission – Scotland
6th Floor, Quartermile One, 15 Lauriston Place
Edinburgh
EH3 9EP
Telephone: 03031231113
Email: Scotland@ico.org.uk

The accuracy of your information is important to us – please note it is your responsibility to inform us of any changes to your personal and contact details so that we can keep our records updated.