



## **Privacy Notice-Staff**

The Privacy Notice is a public document which applies to Arhag Housing Association Limited (Arhag) to explain how the organisation collects and processes personal information in order to conduct normal business activities as a UK housing association. This Privacy Notice tells you what to expect when Arhag processes personal information. It applies to information about staff, board members, and job applicants. It tells you the purposes for which we may process your personal information and the legal basis for processing this information.

### **Who we are**

Arhag is a data controller of personal information for the purposes of the General Data Protection Regulation (GDPR). Our contact details for data protection purposes are as follows:

Arhag Housing Association, Unit B, Ground Floor, Mary Brancker House, 54-74 Holmes Road, Kentish Town, London NW5 3AQ

020 7424 7376 / CSanwo@arhag.co.uk

The individual responsible for data protection compliance at Arhag is Cornelius Sanwo.

### **Why do we collect and store personal information?**

Arhag processes personal information for the purpose of employment duties and for equal opportunities monitoring:

- Providing associated welfare services, advice and support
- Maintaining our accounts and records
- Maintaining and managing our employees, agents and contractors

### **Legal basis for processing**

Arhag will only collect and process your personal data under the GDPR where the following conditions have been met:

- The processing is necessary for the performance of a contract we have with you;
- It is in our legitimate business interests as an employer to process your information. We can do so as long as we do not interfere with your fundamental rights or freedoms.

Some personal information is treated as more sensitive (such as health, sexuality, ethnic background – see footnote below for a full list<sup>1</sup>). The legal basis for processing personal information is more limited. The reasons we can use are:

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<sup>1</sup> Special categories is defined within GDPR and includes race, ethnic origin, politics, religion, trade union membership, genetics, biometric data, health, sex life, or sexual orientation.

- For purposes of carrying out obligations and exercising specific rights in the field of employment and social security and social protection
- For purposes of assessment of working capacity of employee, medical diagnosis, provision of health or social care or treatment

Any legitimate interests pursued by us, or third parties we use, are as follows:

- **Equal opportunities monitoring:** We collect protected characteristic data such as your gender, ethnicity, and sexuality to monitor the effectiveness of our equal opportunities policy. This is important for ensuring our services do not exclude certain disadvantaged groups and helps to ensure we are an inclusive housing association.
- **Suitability for role:** We collect certain information to assess a candidate's suitability for employment or broad membership. These records allow us to manage the process effectively, and decide whom to offer roles to. We additionally collect information to avoid conflict of interest.

### **How we collect your information**

Arhag collects information from you through forms used during the job applicant phase, as a staff or board member and when a staff member is sick for a period of time. Arhag operates a CCTV system to provide a safe and secure environment for staff and to protect its property. We use CCTV to detect alleged anti-social behaviour or crime and to monitor security of premises.

Recorded images will automatically be overwritten after a period no longer than 28 days. If an image/s has been stored for evidential purposes and is no longer required, it will be destroyed in an appropriate manner.

### **What information we collect from you**

The information we collect from you and hold on our records include:

- Names and date of birth, proof of ID, contact details including emergency contact
- National insurance number
- Special categories information such as race, gender, ethnic origin, and sexuality for our equality monitoring purposes. We also collect information on disabilities, vulnerabilities and special needs to tailor our service to better meet your particular circumstances and needs. We may use this information for safeguarding of staff.
- Bank details
- We collect your education and employment history for job application processes
- We record health, safety and security details

This is not an exhaustive list as we hold records of most contacts we have with you, or about you, and we process this information so we can deliver services to you. Generally the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances.

## **How we manage your personal information**

Arhag processes your personal information in accordance with the principles of GDPR. We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes;
- Kept up-to-date, accurate, relevant and not excessive;
- Not kept longer than is necessary;
- Kept secure

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate. Arhag uses a range of systems to store personal data and we maintain these to ensure they are secure and to comply with GDPR standards. All data is held within the UK.

## **How long we store your personal information**

Arhag will process personal data for the duration of a relationship between Arhag and the 'data subject' and will store the personal data for a minimum of 6 years after tenancy termination or the end of a relationship between Arhag and the 'data subject'. Information processed from unsuccessful job applications will be retained for a minimum of 1 year, after which it will be destroyed.

## **Who we may share your information with**

We sometimes need to share the personal information we process with other organisations who need to know the information in order to carry out their legitimate duties. Where this is necessary we are required to comply with all aspects of GDPR. Requests from outside organisations for information about employees and board members must be in writing unless there are good reasons for the matter to be dealt with orally e.g. an urgent request from the police where somebody's health or safety is at risk. Such situations will be rare and Arhag will use its discretion to consider where such disclosure would be appropriate in the circumstances.

Arhag will ensure the safeguarding of its residents' rights is considered when approached by an outside agency with a request for information.

The following is a list of the types of organisations we may need to share some of the personal information we process with for one or more reasons:

- Past or prospective employers
- Examining bodies
- Training companies
- Financial organisations
- Auditors
- Other Housing Associations

- Peninsula
- Government Departments
- Local government
- Consultants
- Courts and Tribunals
- Professional bodies
- Credit reference and debt collection agencies

## Your rights

Under the GDPR, you have the right to ask us what personal information we hold, and to request a copy of this information. You can complete a 'subject access request' (SAR) application form in the GDPR folder on the shared drive, to make it easier for us to respond to your request quickly. We will not charge a fee unless a request is unfounded or excessive, in which case we can charge a reasonable fee based on the administrative cost of providing the information. We may also charge a reasonable fee to comply with requests for further copies of the same information.

We have one calendar month within which to provide you with the information you've asked for. Following your SAR, we will provide you with a copy of the information we hold that relates to you. This will not generally include information that relates to your property such as repair logs or details of contractor visits as this is not considered personal information.

You have the right to correct any mistakes contained in the information we hold about you. Please advise us of any changes or corrections by contacting us at [GDPR@arhag.co.uk](mailto:GDPR@arhag.co.uk)

You also have the right to:

- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- object to processing where we say it is in our legitimate business interests, unless we can show there is a compelling legitimate reason for the processing
- Restrict us from processing your personal information

## The right to complain and the ICO

You have the right to complain about any matter relating to our service, including how we use your personal data.

In the first instance, please contact our Customer Services team by email at [GDPR@arhag.co.uk](mailto:GDPR@arhag.co.uk)

You have the right to complain to the ICO if you think we have breached the GDPR. You can contact the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF 0303 123 1113 / <http://www.ico.org.uk/>