

Thenue Housing Association Employee Fair Processing Notice

Thenue Housing Association is a Scottish Charity (Scottish Charity Number SC032782), a registered society under the Co-operative and Community Benefit Societies Act 2014 (No 1933R(S)) and having our Registered Office at 423 London Road, Glasgow, G40 1AG. We take the issue of security and data protection very seriously and strictly adhere to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, together with any domestic laws subsequently enacted.

As an employer, Thenue Housing Association is a data controller and collects and processes personal data and special category personal data relating its employees to manage the employment relationship it has with you as an employee and after you cease being an employee. We want to be transparent about how we collect and use your data and to meet our data protection obligations.

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.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5976217 and we are the data controller of any personal data that you provide to us. Our Data Protection Co-ordinator is Lynne McKenzie-Juetten, any questions relating to this notice, and our privacy practices, should be raised with her.

Our Data Protection Officer is RGDP LLP who can be contacted at info@rgdp.co.uk.

What personal information we collect and why is it processed?

We collect and process a range of information containing personal data about you. The table below details the personal data collected, the purpose for this and the legal basis for processing:

Personal Information	Purpose	Our legal basis
Basic personal information and contact details including: <ul style="list-style-type: none">NameAddressdate of birthtelephone numberemergency contact details	To maintain accurate employee records and contact details. To be able to contact someone in the event of an emergency. To allow contract, HR and business administration and defence against potential legal claims.	Necessary for the performance of a contract with you. Necessary for compliance with a legal obligation. Necessary for our legitimate interests

<p>Recruitment records including:</p> <ul style="list-style-type: none"> • CVs, interview notes and assessments • proof of right to work in UK (such as passports and visas) • evidence of education and qualifications • References • Employment Contract • Induction records 	<p>To make a decision about your suitability for the role you applied for.</p> <p>To comply with legislative and regulatory requirements</p> <p>To allow contract, HR and business administration and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract with you</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for our legitimate interests</p>
<p>Payroll Information including:</p> <ul style="list-style-type: none"> • pay and benefits entitlements • bank details • national insurance number 	<p>To pay employees and make appropriate tax payments and keep appropriate records.</p> <p>To allow HR and payroll and benefit administration and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract with you</p> <p>Necessary for compliance with a legal obligation</p>
<p>Work schedule and Leave including:</p> <ul style="list-style-type: none"> • days of work • working hours • attendance • leave taken • leave requests • leave authorisation 	<p>To pay employees correctly</p> <p>To comply with legal requirements regarding working time</p> <p>To allow resource planning</p> <p>To manage statutory and non-statutory holiday and leave.</p>	<p>Necessary for the performance of a contract</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for our legitimate interests</p>
<p>Pension records including:</p> <ul style="list-style-type: none"> • name • marital status • address • DOB • Salary • Pension age • Beneficiaries 	<p>To make appropriate pension payments.</p> <p>To comply with Legislative and regulatory requirements</p> <p>To allow pension administration and defence against potential legal claims.</p> <p>To allow auditing and reporting of Pension schemes</p>	<p>Necessary for the performance of a contract</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>
<p>Performance records including:</p> <ul style="list-style-type: none"> • appraisal documents 	<p>To maintain a record of the operation of performance improvement processes.</p>	<p>Necessary for the performance of a contract</p>

<ul style="list-style-type: none"> • probation and performance reviews • performance improvement plans • records of capability meetings and related correspondence/ warnings 	<p>To allow HR administration and defence against potential legal claims.</p>	<p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>
<p>Disciplinary and grievance records including:</p> <ul style="list-style-type: none"> • records of investigations • witness statements • notes of disciplinary or grievance meetings • correspondence with employees • relevant warnings 	<p>To maintain a record of the operation of disciplinary and grievance procedures and their outcome.</p> <p>To allow HR administration and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>
<p>Absence records including:</p> <ul style="list-style-type: none"> • details of absence taken • reasons for absences • records of absence management discussions such as Return to Work Interviews • correspondence with employees 	<p>To maintain records of the implementation of absence procedures</p> <p>To ensure that employees receive statutory and contractual sick pay or other pay entitlements and benefits</p> <p>To meet health and safety obligations and comply with the requirement to make reasonable adjustments</p> <p>To allow HR administration and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>
<p>CCTV Images</p>	<p>To maintain security of Thenué's premises</p> <p>To provide a safe working environment for employees</p> <p>To comply with legislative and regulatory requirements</p>	<p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>
<p>Information about Employee use of business equipment including:</p> <ul style="list-style-type: none"> • access to computers 	<p>To maintain the operation, security and integrity of</p>	<p>Necessary for compliance with a legal obligation</p>

<ul style="list-style-type: none"> • desk telephones • mobile phones • software and applications • Internet usage • Emails • Social media 	<p>business communications systems</p> <p>To provide IT and communications systems support</p> <p>To preventing excessive personal use</p>	Necessary for our legitimate interests
Photos and Videos	To promote the business of Thenue Housing Association	Necessary for our legitimate interests

Special category personal information	Purpose for processing	Our legal basis for processing	Special category legal basis
Family leave including maternity, paternity, adoption and shared parental leave, parental leave and time off for dependents (which could include information about Employee health and sexual orientation).	<p>To maintain a record of leave</p> <p>To ensure that employees receive statutory and contractual pay entitlements</p>	<p>Necessary for the performance of a contract</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for our legitimate interests</p>	Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.
<p>Occupational Health records including:</p> <ul style="list-style-type: none"> • medical records • health monitoring information • referrals for treatment such as counselling • reports and correspondence with external practitioners or GP's. 	<p>To assess suitability for work</p> <p>To meet Health & Safety obligations</p> <p>To comply with the requirements to provide reasonable adjustments</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for our legitimate interests</p>	<p>Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.</p> <p>Necessary for the purposes of preventative medicine or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health care systems.</p>
Criminal convictions checks	To assess your suitability to work with us.	Necessary for compliance with a legal obligation.	Necessary for the purposes of carrying out the obligations and exercising specific rights of the

		Necessary for our legitimate interests	controller or of the data subject in the field of employment.
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We will collect this information in a variety of ways including directly from you, and from third parties as outlined below:

- Recruitment Agencies
- Former employers or other referees
- Occupational Health providers
- Banks
- Department of Work and Pensions
- Trade Unions

Who do we share your information with?

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 salary payments;
- To allow your pension provider to process pensions information and handle your pension;
- To allow your electronic payslips to be produced and issued to you;
- If we enter into a joint venture with or are sold to, or merged with, another business entity, your information may be disclosed to our new business partners or owners.

We will share your data as required by law to administer the working relationship that we have with you.

We may share your data with third parties, including third party service providers that process data on our behalf, in connection with payroll; the provision of employee benefits; the provision of occupational health services and IT services.

In relation to our third-party service providers, we have in place a written contract which only permits them to process your data for specified purposes and in accordance with our instructions. All their employees must be subject to a duty of confidentiality. The contract also requires third party service providers to take appropriate security measures in relation to your personal data which are in line with our policies. They are also not allowed to use your personal data for their own purposes.

How do we secure your personal data?

We take the security of your data seriously. We have 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.

In addition, we limit the access that individuals have to your personal data to those who have a business need to know.

Your information will only be stored within the UK and EEA (European Economic Area).

We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a personal data breach when legally required to do so.

How long will we keep your personal data?

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.

Your Rights

You have several rights in relation to your personal data. These are listed below. A fee will not generally be charged for exercising any of these rights unless your requests are manifestly excessive.

- The right to access information about the personal data we process about you and to obtain a copy of it;
- The right to require us to change incorrect or incomplete data;
- The right to require us to erase or stop processing your data; and
- The right to object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing;

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 the Data protection Co-ordinator.

If you still believe that we have not complied with your rights, you can complain to the Information Commissioner's Office. Contact details are available at <https://ico.org.uk/make-a-complaint/>

The accuracy of your information is important to us; please help us keep our records updated by informing us of any changes to your personal and contact details.

What if you do not provide personal data?

You have some obligations under your employment contract to provide us with information. 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 which you have as an employee. You may also have to provide us with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the information to us may mean that you are unable to exercise these statutory rights.

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

Changes to this Privacy Notice

Thenue Housing Association reserves the right to update this privacy notice at any time and will provide you with a new notice when making any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.