



*Paragon Housing Association Limited*

# **STAFF PRIVACY NOTICE**

## **(How we use your personal 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.

## **Introduction**

The purpose of this staff privacy notice, which also applies to job applicants and ex-employees, is to explain to you the reasons which we may hold and use your personal data and explain your rights under the current data protection laws.

As your employer we may collect and process personal data relating to you to manage our contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you.

This notice does not form part of your contract of employment or engagement with us. It applies to all our employees, workers and consultants, regardless of length of service, and may be amended at any time. If any amendments are required in the future, we will notify you as is appropriate.

**Paragon Housing Association of:  
Invergrange House, Station Road, Grangemouth, FK3 8DG**

is registered as a data controller with the Information Commissioner (ICO) and our registered number is Z5624595.

## **Where does your personal information come from?**

The Association may collect information in several ways which include:

- Recruitment processes including information obtained from agencies
- Your identification documents you have given us
- Background checks conditional for your engagement with us (if relevant)
- PVG/Disclosure/DVLA checks relating to criminal convictions/offences
- Former employers or other individuals whom you have given us permission to contact to provide us with a reference. This data could include:
  - Your work history with them, including your dates you were with them;
    - the work tasks you did,
    - your level of responsibility,
    - job title,
    - salary on leaving,
    - reason for leaving their workplace and
    - whether they would be happy to have you work for them again.
    - suitability to the post applied
    - strengths and weaknesses
- Medical professionals provide us with appropriate health information in order that we can manage any health- related situations that may have an impact on your ability to work with us.
- Membership with professional bodies that confirm membership
- Qualifications/training bodies that provide us information relating to you
- Web browsing history and email exchanges will be routinely monitored for the purposes of maintaining the IT infrastructure
- HMRC

## **What Information do we collect?**

The Association controls and processes a range of information about you. In this privacy notice 'your personal information' means your personal data i.e. information about you from which you can be identified. Your 'personal information' does not include data where your identity has been removed (anonymous data). It is really important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

This includes:

- Your name, address, and contact details including email address and telephone number, date of birth and gender
- The terms and conditions of your employment or engagement with us
- Details of your qualifications, skills, experience and work history, including start and end dates with previous employers and workplaces
- Information about your remuneration, including entitlement to benefits such as, pay, pension and holidays
- Details of your bank account and national insurance number
- Information about your marital status, next of kin, dependants and emergency contacts
- Information about your nationality and entitlement to work in the UK
- Information about any criminal convictions if relevant for your job.
- Details of your work pattern (days of work and working hours) and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence
- Information about medical or health conditions, including if you have a disability for which the organisation needs to make reasonable adjustments
- Equal opportunities monitoring information about your ethnic origin, sexual orientation and religion or belief
- CCTV imagery

The data we hold about you will be kept in your personnel file which is stored securely and access to the files is restricted. The information will only be held for the periods outlined in the Association's Retention Policy.

## **What are the legal bases for us processing your personal data?**

We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV recordings)
- vital interests
- public interest / official authority
- legal obligation

## **Processing special category personal data**

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to meet additional legal requirements for collecting, storing and using this type of personal information.

## **Who might my data be shared with, or seen by?**

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to complete a regulatory return
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations.

## **If you do not wish to provide your personal data**

You have obligations under your employment contract to provide the organisation with the necessary 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 Association 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 the payment details, have to be provided to enable the Association to enter into a contract of employment with you. If you do not provide other information, this will hinder the Association's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

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

Your information will only be stored within the UK and EEA.

## **How do we keep your data safe?**

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All data is held in accordance with our Association's data protection policies and procedures.

## **How long we will 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 best practice, and in accordance with our Date Retention Policy and Schedule.

## **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;
- require us to correct any inaccuracies in your information;
- in certain situations, make a request to us to delete your personal data;
- request we restrict processing your personal data;
- object to receiving any marketing communications from us, and;
- to be informed of any automated decisions made in relation to you.

## **Queries and Complaints**

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to [enquiries@paragonha.org.uk](mailto:enquiries@paragonha.org.uk) or by telephoning 01324 664966.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 07935 008 316 or [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

*The Information Commissioner's Office – Scotland  
Queen Elizabeth House  
Sibbald Walk  
Edinburgh  
EH8 8FT*

*Telephone: 0303 123 1115  
Email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)*

**Acknowledgement of receiving and reading this notice**

I \_\_\_\_\_ [print name]

confirm that I have read and understood the contents of this Staff Privacy Notice.

**Signed**

**Date**