

Privacy Notice

(How we use employee 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. Glasgow West Housing Association Limited (“we” or “us”) is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to guidelines published in the UK GDPR and Data Protection Act of 2018 (the 2018 Act), together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number Z8337448 and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to the Governance and HR Team, GWhA, 5 RoyalCrescent, Glasgow, G3 7SL in the first instance.

2. We collect the following information from you through a variety of resources (i) directly from you; or (ii) 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) Personal characteristics such as marital status, gender and ethnic group
 - (h) Medical or health information relevant to your employment (which may include COVID status)
 - (i) Details of your qualifications, skills, experience and work history including start and end dates with previous employers and workplaces
 - (j) Details of your work pattern (days and hours) and attendance at work
 - (k) Next of Kin / dependents / emergency contact details
 - (l) GP's details
 - (m) Information about your remuneration, including entitlement to benefits such as pay, pension and holidays
 - (n) Bank Account details
 - (o) GP medical requests/ letters of health related appointments
 - (p) Information about your nationality and entitlement to work in the UK
 - (q) Employment References
 - (r) Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
 - (s) Assessments of your performance, including performance reviews and related correspondence
 - (t) General correspondence relating to your employment
 - (u) Vehicle details including business insurance
 - (v) Information about any criminal convictions if this is relevant to your job
 - (w) Details of period of leave taken by you, including annual leave, sickness absence, family leave and sabbaticals
 - (x) Criminal convictions if relevant
 - (y) Professional membership bodies

3. CCTV operates within the work place for the following reasons:
 - (a) To prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime.
 - (b) For the personal safety of residents, staff, visitors and other members of the public and to act as a deterrent against crime.
 - (c) To support law enforcement bodies in the prevention, detection and prosecution of crime.
 - (d) To assist in day to day management, including ensuring the health and safety of staff and others.
 - (e) To assist in managing conduct and performance of employees, including investigating allegations of misconduct and/ or allegations of poor performance.
 - (f) To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
 - (g) To assist in the defence of any civil litigation, including employment tribunal proceedings.
 - (h) To assist in the investigation of formal complaints.
4. We need to process the data we hold on you in order that we comply with our obligations with you under the contact we have with each other. This includes
 - (a) Administration of contracts of employment in line with our Terms and Conditions of Employment, Policies, Procedures and legal obligations (including Health and Safety).
 - (b) Payment of salaries
 - (c) Recruitment and selection
 - (d) Pensions and associated benefits, appraisal, training and development
 - (e) Membership of professional bodies
 - (f) SHR annual return
 - (g) Disclosure checks
 - (h) CCTV images / footage
5. We are required;
 - (a) to obtain checks regarding your right to work in the UK,
 - (b) to deduct tax, National Insurance, and administrate your pension,
 - (c) to comply with health and safety laws and
 - (d) to enable you to take periods of leave to which you are entitled.

We are also required to process special categories of personal data, such as information about health or medical conditions to carry out our employment law obligations, such as those in relation to any disability you may have or arises.

We are also required to process your data in accordance with our legitimate interests which can occur, during and after our employment relationship which will allow us to:

- (a) Run recruitment processes including information obtained from agencies
- (b) Conduct right to work checks involving Identification documents
- (c) Maintain accurate and up to date employment records, contact details, emergency contact details, and records of employee contractual statutory rights
- (d) Operate and keep a record of disciplinary and grievance processes,
- (e) Plan for career development, succession planning and workforce planning
- (f) Operate and keep a record of absence management procedures, to allow workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled.
- (g) Obtain occupational health advice, ensuring that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled.
- (h) Operate and keep a record of other leave you may take including maternity, paternity, adoption, parental and shared parental leave, to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- (i) Ensure effective general HR and business administration
- (j) Provide references on request for current or past employees; and
- (k) Respond to and defend against legal claims
- (l) In the event of a business sale/transfer
- (m) Any regulatory checks and/or statutory check/requirements in relation to your engagement with us

6. 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:
 - (a) To assist in the recruitment process of staff members;
 - (b) To allow your pension provider to process pensions information and handle your pension;
 - (c) To allow your electronic payslips to be produced and issued to you;
 - (d) To obtain employment law, specialist HR advice and/or medical advice;
 - (e) To HMRC, DWP and other third party agencies;
 - (f) If we enter into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.
 - (g) To process your salary payments;
 - (h) For reasons considered relevant to Health and Safety
7. Your information will only be stored within the UK.
8. When you give us information we take steps to make sure that your personal information is kept secure and safe. We hold a copy of your personnel file electronically. Access is restricted to the organisation's HR function and line managers.
9. 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 is provided in our Privacy Policy which can be found in the staff handbook.
10. You have the right at any time to:
 - (a) Ask for a copy of the information about you held by us in our records;
 - (b) Object to, or request that we restrict, the processing of your personal data; and
 - (c) Require us to correct any inaccuracies in your information
 - (d) make a request to us to delete what personal data of your we hold

These rights are qualified and are not absolute.

11. 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 Governance and HR Team

If you have any complaints about the way your data is processed or handled by us, please contact Governance and HR Team.

If you remain dissatisfied after your complaint has been processed by us, 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

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

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