

ADVANCE HOUSING AND SUPPORT LTD

Privacy Notice: Employee

Introduction

The purpose of this policy is to outline our approach to protecting the personal data we collect, process, hold and share as a Data Controller if you are an employee, volunteer or contractor of Advance Housing and Support (hereinafter “Advance”) or our related services (“all referred to as “employees” for the purposes of this Privacy Notice).

We take your privacy seriously and are committed to protecting information through a range of technical and organisational measures to safeguard all personal information under our control. We maintain records of our processing activities, data protection risk assessments and a range of other measures to support our compliance with data protection law. This privacy policy is a key component of our wider information security and governance framework incorporating our Data Protection and ICT policies.

As an employer, Advance is required to process information about its employees for employment purposes and this privacy policy explains how Advance comply with the data protection legislation and what your rights are.

This policy does not form part of any contract.

References to “we”, “our”, or “us” in this privacy policy are to Advance.

Personal data we collect

During the recruitment process and your subsequent employment with us, we may collect and process information about you in order to fulfil our obligations and role as your employer. This includes:

- Name
 - Proof of Identity / proof of right to work
 - National insurance number
 - E-mail address, postal address and phone number
 - Signature
 - Date of birth
 - CV, recruitment / interview notes, references
 - Salary/deductions, bank details and employment details. Pension and tax data.
 - Health issues, allergies, disabilities
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- Ethnicity data
- Photographs
- Movement through CCTV footage
- DBS check data and results
- Disciplinary data, performance assessment data etc
- Emergency contact / next of kin data

Where permitted by law and applicable we may collect the results of credit and criminal background checks, screening, health certifications, driving license number, vehicle registration, and driving history.

This is set out in the Data Protection Act 2018 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. We do not keep a record of your criminal records information (if any).

Special categories of personal data

We process information related to your health and wellbeing and other special category data to ensure the health, safety and wellbeing of our employees and volunteers. The specific data processed is:

- Health and wellbeing information provided by you e.g. sickness records
- Accident records if you have an accident at work
- Details of desk audits or workstation assessments, access or reasonable adjustment needs
- Details of any protected characteristics that you have told us about

We will only process this information where we have a lawful basis to do so.

Where we collect your data

We may collect personal data about you throughout your application and subsequent employment and involvement with us.

If, for any reason, you are providing us with details of other parties, e.g. family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it, how we use it and how we may share that information. Please share this policy with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

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Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees.

How we use your personal data

Any personal information we process about you will be done so in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and other applicable legislation. We may use your personal data for various purposes related to your employment with us, including the following:

Purposes For Processing	Lawful Basis under UK GDPR Article 6	Article 9 UK GDPR
To take steps to employ individuals, manage the employment of staff and manage the exit process of staff To review references of potential employees in the recruitment process	Article 6(1)(b) - Necessary for the performance of a contract	N/A
To undertake appraisals, one-to-ones and probational periods	Article 6(1)(b) - Necessary for the performance of a contract	N/A
To process payroll, pensions, tips, benefits and overtime	Article 6(1)(b) - Necessary for the performance of a contract	N/A
To process necessary disciplinary information	Article 6(1)(f) - Legitimate interests	If processing involves special category data, in particular health information, Article 9(2)(b) - Employment and social protection law, and Schedule 1, Part 1(1) of the DPA 2018 (Employment)
To carry out financial	Article 6(1)(c) - Compliance	N/A

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accounting	with a legal obligation	
To use in legal processes, where necessary	Article 6(1)(f) - Legitimate interests	Article 9(2)(f) - Establishment, exercise or defence of legal claims
To monitor IT permission settings and user activity logs	Article 6(1)(f) - Legitimate interests	N/A
To communicate with you and to share news about our organisation	Article 6(1)(b) - Necessary for the performance of a contract	N/A
For audit purposes	Article 6(1)(c) - Compliance with a legal obligation	N/A
To show that staff have the right to work in the UK	Article 6(1)(c) - Compliance with a legal obligation	N/A
To keep details of training requested by individual to track against performance & development requirements. To store details of the training including dates & location for future reference, if needed.	Article 6(1)(b) - Necessary for the performance of a contract	N/A
To provide users with upgrade to IT Hardware (e.g., laptop, mobile phone, tablets)	Article 6(1)(f) - Legitimate interests	N/A
To provide existing users with access to systems	Article 6(1)(b) - Necessary for the performance of a contract	N/A
Employment checks	Article 6(1)(c) - Compliance with a legal obligation	Article 9(2)(b) and Schedule 1, Part 1(1) of the DPA 2018
Risk assessments if necessary	Article 6(1)(c) - Compliance with a legal obligation	Article 9(2)(b) - Employment and social protection law, and Schedule 1, Part 1 of the

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Legitimate interests

Where we use your personal data to pursue the legitimate interests of the business, we will only do so after completing a legitimate interests assessment to ensure your interests and fundamental rights do not override these interests.

Our Legitimate Interests for processing your data include our use of CCTV to protect our property and employees, to monitor staff turnover, to develop work schedules, monitor IT usage, to communicate with staff and volunteers and to investigate any complaints. We will also process your data for performance appraisals and reports, in the event of redundancies and in the event of any disciplinary actions or if a critical incident occurs.

Sharing your personal data

We may share your personal data with third parties where there is a lawful basis under UK GDPR for it. These will include:

- Her Majesty's Revenue and Customs (HMRC)
- Our pension and pension advisors
- Healthcare/assistance schemes (including lone working scheme and occupational health)
- Regulators, commissioners e.g. Local Authority for safeguarding purposes and CQC
- The police or other law enforcement agencies if we have to by law or court order
- Our DBS service provider
- Employees benefit schemes, employee support schemes and grant funding organisations.

We may disclose your personal data to other organisations who assist us to deliver our products or services; make a lawful request for disclosure; provide us with professional services or advice; or assist us in our marketing and promotional work.

Third parties will not be allowed to use your personal information for their own purposes, and we do not sell information to others.

Transferring your data internationally

The personal information collected by Advance may be transferred to and stored in countries outside of the UK, although it is not our standard practice to do so. Whenever we arrange for international transfers of data overseas we will ensure the suitable arrangements are in place to provide suitable safeguards for the people whose information we transfer. When we appoint

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overseas data processors we check that suitable arrangements are in place such as United Kingdom Adequacy Regulations, EU Standard Contractual Clauses, or other permitted mechanisms.

Data retention

Advance will only keep your personal data for as long as it is absolutely necessary for the purposes for which they were collected. Typically, where data is collected for your employment, we will keep hold of this data until the end of your employment plus 6 years.

Advance have policies in place to guide our retention of your personal data. Retention periods are maintained within the Retention of Records Policy and the Record of Processing Activities and are available on request.

Additionally, it is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You may be able to update some of the personal information we hold about you by contacting us using the details in the “How to Contact Us” section below.

Your rights

Under UK data protection law, you have a set of certain rights and they are as follows:

- **Right of access:** You have the right to obtain confirmation from Advance as to whether personal data concerning you are being processed and, where that is the case, access to that data.
 - **Right to rectification:** You have the right to oblige Advance to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
 - **Right to erasure:** You have the right (under certain circumstances, but not all) to oblige Advance to erase personal data concerning you.
 - **Right to restriction of processing:** You have the right (under certain circumstances, but not all) to oblige Advance to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
 - **Right to data portability:** You have the right (under certain circumstances, but not all) to oblige Advance to provide you with the personal data about you which you have provided
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to Advance in a structured, commonly used and machine-readable format.

- You also have a right to oblige Advance to transmit those data to another controller.
- **Right to withdraw consent:** If the lawful basis for processing is consent, you have the right to withdraw that consent.
- **Right to object to direct Marketing:** Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Rights in relation to automated decision-making and profiling:** Advance does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

You should note that some of these rights may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

CCTV and photographs

Some of our locations and offices have CCTV and you may be recorded when you visit them. CCTV is used to provide security and to protect our customers, staff, visitors and communities. CCTV will only be viewed when necessary and footage is stored for a set period of time.

Advance complies with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent, which is held within our Marketing, Communications & Customer Engagement team.

Your right to lodge a complaint with a supervisory authority

You also have a right to lodge a complaint with Information Commissioners Office (ICO) where you believe we have not complied with UK data protection law. In the first instance, we encourage you to resolve the matter with Advance. However, you can contact the ICO via www.ico.org.uk, casework@ico.org.uk or 0303 123 1113

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Automated decision making

Advance do not currently make decisions based solely on automated processing. Should Advance embark on such processing this policy will be updated to reflect the logic involved in the process and explain the significance and envisaged consequences.

How to contact us

For further information regarding your personal data or about Advance’s approach to data protection in general please contact our Data Protection Officer at:

Advance Housing and Support Ltd
 2 Witan Way,
 Witney Oxon,
 OX28 6FH

(e) data.protection@advanceuk.org

(t) 0333 012 4307

Changes to our privacy notice

Advance may update this privacy policy from time to time. When we change this policy in a material way, we will update the version date at the bottom of this page. For significant changes to this policy, we will try to give you reasonable notice unless we are prevented from doing so. Where required by law, we will seek your consent to changes in the way we use your personal information.

Version Control

Version	Approved By	Date	Changes
2.0	Executive Director of Finance & Technology	08.10.24	Full update and refresh.