

## **Privacy Notice for Employees, Former Employees, Job Applicants and Board Members**

This privacy notice explains how Castles & Coasts Housing Association (**CCHA**) collects and uses personal data for:

- Employees
- Former Employees
- Job Applicants
- Board Members

This includes job applicants, current and former employees of Castles & Coasts Services (**CCS**) our in-house repairs and maintenance team and current employees/former employees of Two Castles Housing Association or Derwent & Solway Housing Association who transferred, or were intending to transfer, to CCHA as part of the merger.

### **Who we are**

CCHA is a Registered Social Housing Provider, registered under the Co-operative and Community Benefits Society Act 2014 (company number RS007617) with registered office at 3 Paternoster Row, Carlisle, Cumbria CA3 8TT.

For the purpose of the Data Protection Act (2018) CCHA is registered as a data controller with the Information Commissioners Office with registration number ZA268880.

CCHA's Data Protection Officer is contactable by the following methods.

Address – 5 Paternoster Row, Carlisle, Cumbria CA3 8TT

Telephone - 0800 085 1171

Email - [gdpr@castlesandcoasts.co.uk](mailto:gdpr@castlesandcoasts.co.uk)

### **Information for job applicants**

If you apply for a job with CCHA, we will need to collect your personal data as we are considering entering into a contract of employment with you. CCHA will collect the following information.

- |                                                           |                                                                      |
|-----------------------------------------------------------|----------------------------------------------------------------------|
| - Name, address and contact details                       | - Authority to work in the UK                                        |
| - Qualifications and education history                    | - If you hold a driving licence                                      |
| - Employment history                                      | - Details of unspent criminal convictions                            |
| - Supporting information (as provided in the application) | - Disclosure and Barring Service Check, where stated in the Job Pack |
| - Equality and diversity                                  | - Details of any previous or current connections to CCHA             |
| - Interview notes and scoring                             | - References                                                         |
| - CVs                                                     |                                                                      |

CCHA will also collect equality and diversity information, including age, gender, ethnicity, religious beliefs, disability, sexuality, relationship status for our legitimate interest to monitor the equality, inclusion and diversity of our recruitment and ensure compliance with our policies and processes. This information is held separately, and not considered as any part of the recruitment process.

The information is directly collected from job applicants or the referee(s) that the applicant has nominated. In most cases this is done via a website that is supplied by Net-Worx (2001) Ltd (trading as Networx). They will only process your data in accordance with our instructions.

CCHA will keep the information collected for unsuccessful job applicants for 12 months after the recruitment process has ended. For successful job applicants, CCHA will retain some information for the duration of your employment, however documents specific to the recruitment process, such as interview notes will be kept for twelve months after your probationary period has ended.

Information is held on your Net-Worx account until 12 months of you being inactive on your Net-Worx account or you can log on at any time and deactivate your account.

### Information for employees, former employees and Board/Committee Members

If you enter into a contract of employment with CCHA, have previously been employed by CCHA, or were an employee/former employee of Two Castles Housing Association or Derwent & Solway Housing Association who transferred or were intending to transfer to CCHA as part of the merger, CCHA may process the information as set out below.

If you have a contract for the provision of services as a Board or Committee Member, the data CCHA may process about you is indicated by (B).

In addition to the information that was collected as part of the application process (as set out above), CCHA will process the following information, this is either provided by you or created by you or CCHA as part of the employment you have with us. CCHA will not necessarily hold, use or share all of the types of personal data described in this Privacy Notice in relation to you. The specific types of data about you that we will hold, use and share will depend on your individual circumstance.

| The information we process                                                                                                                                           | Why we process the information                                                  | Who we may share the information with *                                                              | How long we will keep the information for                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Your name, contact details - address, home and mobile phone numbers, email address. Date of birth (B)                                                                | To enter into and perform the employment contract.                              | HM Revenue and Customs (HMRC)<br>Pension Provider (Social Housing Pension Scheme or Scottish Widows) | Six years after employment ends.                                                                       |
| Emergency contacts (i.e. name, relationship and home and mobile phone numbers)                                                                                       | Legitimate interests so we have someone to contact in the event of an emergency |                                                                                                      | One year after the end of employment                                                                   |
| Contracts, offer letters and variations. (B) (Including flexible working requests and outcomes)                                                                      | To perform the employment contract including payment of salary and benefits     | HM Revenue & Customs (HMRC) – in line with our legal obligations                                     | Six years after employment ends                                                                        |
| Bank/building society details (B)                                                                                                                                    | To perform the employment contract - to pay your salary                         |                                                                                                      | Six years after employment ends                                                                        |
| Details of salary and benefits, National Insurance and tax information, expenses (B)                                                                                 | To perform the employment contract                                              | HM Revenue & Customs (HMRC)                                                                          | Six years after employment ends                                                                        |
| Statutory Maternity Pay records/ Statutory Paternity Pay / Statutory Shared Parental Pay<br><br>Records, notices, calculations, certificates (Mat B1s) and leave (B) | To perform the employment contract and our legal obligations                    | HM Revenue & Customs (HMRC)                                                                          | Three years after the end of the tax year in which the maternity/paternity /shared parental leave ends |
| Income tax and NI returns and correspondence with HMRC (B)                                                                                                           | Legal obligation                                                                | HM Revenue & Customs (HMRC)                                                                          | Not less than three years after the end of the financial year to which they relate                     |

| The information we process                                                                                                                                    | Why we process the information                                                                                                                                                             | Who we may share the information with *                                                                                                            | How long we will keep the information for                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Redundancy documentation including calculations of payment                                                                                                    | To perform the employment contract                                                                                                                                                         | HM Revenue & Customs (HMRC)                                                                                                                        | Six years after employment ends                                                |
| Details of your spouse/partner and any dependants                                                                                                             | To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension                                                       | HM Revenue & Customs (HMRC)                                                                                                                        | Six years after employment ends.                                               |
| Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information (B) | Legal Obligation – Right to Work in the UK                                                                                                                                                 | Information may be shared with the Home Office                                                                                                     | Two years after employment ends                                                |
| A copy of your driving licence, Insurance, vehicle details and MOT certificate (if you claim mileage or will be driving a CCHA vehicle) (B)                   | Legal obligation<br>To ensure that you have appropriate driving qualifications, insurance and MOT                                                                                          | Information may be shared with our insurer                                                                                                         | Duration you drive on business, plus three years                               |
| Details of your pension arrangements, and all information included in these and necessary to implement and administer them                                    | To perform the employment contract<br>To administer your pension benefits and/or to comply with our auto-enrolment pension obligations.                                                    | Information shared with our pension providers, Scottish Widows, People Pension or SHPS and with HMRC                                               | 12 years from the ending of any benefit payable under the policy               |
| Information in your sickness and absence records including return to work interviews and absence reviews                                                      | To perform the employment contract including employment-related benefits and to comply with legal, regulatory and corporate governance obligations                                         | Information may be shared with doctors, with medical and occupational health professionals we engage and with our insurance benefit administrators | Sickness records six months after employment ends                              |
| Timesheets, authorised absence records (annual leave, flexi leave, time off for dependants, Jury Service etc)                                                 | To perform the employment contract                                                                                                                                                         |                                                                                                                                                    | Two years from when the entry was made.                                        |
| Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs (B)                                                                    | Legitimate interests to comply with equal opportunities monitoring.<br><br>Data is collected and held in statistical format and not held with individual employee records or applications. |                                                                                                                                                    | Data is collected through surveys, only the aggregate statistical data is kept |

| The information we process                                                                           | Why we process the information                                                                                                                                         | Who we may share the information with *                                       | How long we will keep the information for                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Criminal records information, including the results of Disclosure and Barring Service (DBS) checks   | To perform the employment contract<br>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty) | Information shared with DBS and other regulatory authorities as required.     | Only the date the DBS check is issued, and the certificate number is retained for the most recent check completed. Held until six years after employment ends                                                                  |
| Information on grievances raised by or involving you                                                 | To comply with our legal obligations                                                                                                                                   | May be shared with external consultants we engage                             | Six months following end of employment.<br><br>Investigation notes, no case to answer 6 months following conclusion                                                                                                            |
| Information on conduct issues involving you (B)                                                      | Legal obligation                                                                                                                                                       | May be shared with external consultants we engage                             | Two years following issue of the warning.<br><br>File notes no formal action 6 months following conclusion.<br><br>Investigation notes, no case to answer 6 months following conclusion                                        |
| Line management records, appraisal records and other performance records including 360 feedback. (B) | To perform the employment contract                                                                                                                                     | May be shared with external consultants we engage                             | Six years after employment ends                                                                                                                                                                                                |
| Performance Improvement plans (B)                                                                    | Legitimate Interests – employee performance                                                                                                                            |                                                                               | Two years following issue of the warning or instigation of improvement plan.<br><br>File notes no formal action six months following conclusion.<br><br>Investigation notes, no case to answer six months following conclusion |
| Education, Qualifications and career history (B)                                                     | To perform the employment contract                                                                                                                                     | May be shared with external consultants we engage                             | Six years after employment ends                                                                                                                                                                                                |
| Training attended and completed (B)                                                                  | Legitimate interests in records relating to the training and development of employees                                                                                  | May be shared with external consultants we engage                             | Six years after employment ends                                                                                                                                                                                                |
| Medical capability documents and records including Occupational Health reports.                      | To perform the employment contract                                                                                                                                     | May be shared with external consultants we engage, Choose Occupational Health | Six months following end of employment                                                                                                                                                                                         |
| Details of your time and attendance records                                                          | To perform the employment contract                                                                                                                                     | Consultants we may engage                                                     | Six years after employment ends.                                                                                                                                                                                               |

| The information we process                                                                                                                                                                        | Why we process the information                                                                                                                                                                                                              | Who we may share the information with *                           | How long we will keep the information for                                                                                                                                                 |
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| Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur) | Legitimate interests to monitor and manage staff access to our systems and facilities. to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage in line with our policies | Consultants we may engage.                                        | Two years following issue of the warning<br><br>File notes no formal action six months following conclusion.<br><br>Investigation notes, no case to answer 6 months following conclusion. |
| Details in references about you that we give to others (B)                                                                                                                                        | Consent                                                                                                                                                                                                                                     | At your request we will supply a reference to other employers     | One Year after reference sent.                                                                                                                                                            |
| Photographs, images, and recordings taken for communication and publicity (B)                                                                                                                     | Consent                                                                                                                                                                                                                                     | You will be informed at the time we seek your consent             | You will be informed at the time we seek your consent                                                                                                                                     |
| Photograph for ID card and Teams icon (B)                                                                                                                                                         | Legitimate Interests – staff identification                                                                                                                                                                                                 |                                                                   | Six years after the end of employment                                                                                                                                                     |
| Surveys, views and opinions (B)                                                                                                                                                                   | Legitimate interests to gather and understand the views of staff/Board Members                                                                                                                                                              |                                                                   | Surveys usually anonymous, responses retained for two years                                                                                                                               |
| Staff concerns and whistleblowing records                                                                                                                                                         | Legal Obligation                                                                                                                                                                                                                            |                                                                   | Dependent on nature of record                                                                                                                                                             |
| Any disclosed disabilities, reasonable adjustments, personal evacuation plans (B)                                                                                                                 | Legal Obligation                                                                                                                                                                                                                            | We may need to share some information with our insurers           | Six years after the end of employment                                                                                                                                                     |
| Health and Wellbeing information including where relevant vaccinations such as Hep B vaccinations                                                                                                 | Legitimate interests to look after the health and safety of employees                                                                                                                                                                       |                                                                   | Six years after the end of employment                                                                                                                                                     |
| Declaration of Interest - Life Insurance                                                                                                                                                          | Legitimate interests - needed in the event of a life insurance payment                                                                                                                                                                      |                                                                   | Six years after the end of employment                                                                                                                                                     |
| Declaration of Interest – potential conflict of interests (B)                                                                                                                                     | Legitimate Interests – best practice for code of conduct                                                                                                                                                                                    |                                                                   | Six years after the end of employment                                                                                                                                                     |
| Accident reports, near miss reports and RIDDOR Reports (B)                                                                                                                                        | Legal obligations                                                                                                                                                                                                                           | Insurers, Health and Safety Executive (RIDDOR reporting)          | Six years after record made                                                                                                                                                               |
| Code 5 usage and lone worker information                                                                                                                                                          | Legal Obligation – health and safety of employees                                                                                                                                                                                           | Our Lone Worker monitoring and response provider – Orbis Protect. | When employment ends                                                                                                                                                                      |
| Employee risk assessments, including home working risk assessments and Personal Evacuation plans (B)                                                                                              | Legitimate Interests – health and safety of employees                                                                                                                                                                                       |                                                                   | Two years unless exceptional circumstances i.e. asbestos risk assessment which is retained for 40 years                                                                                   |

| The information we process                      | Why we process the information                                             | Who we may share the information with *           | How long we will keep the information for                                                                                                        |
|-------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Health Surveillance for CCS employees           | Legitimate interests – to look after the health and wellbeing of employees |                                                   | Five years unless a significant issue identified (i.e. hand arm vibrations, noise or hearing loss or asbestos) which may be kept up to 40 years. |
| Office signing in and out (B)                   | Legal obligation – fire safety                                             | Emergency services in the event of an emergency   | One day                                                                                                                                          |
| IT systems logging on and off records (B)       | Legitimate interests – IT security (for unusual activity on the system)    |                                                   | Overwritten every 10 days                                                                                                                        |
| CCTV footage (B)                                | Legitimate interests – safety of staff and security of buildings           | Police in the event of a crime or suspected crime | One month                                                                                                                                        |
| Records of equipment (B) and keys issued to you | Legitimate interests                                                       |                                                   | Until all equipment and keys are returned at the end of employment                                                                               |

\*CCHA uses an HR system known as Cascade that is provided by IRIS group Ltd. This system stores employee and former employee data. Employees are able to view the data held on Cascade by login into Cascade.

\*CCHA employs an external HR consultant Barnfather Consulting; employee data may be shared with Barnfather consulting.

When CCHA uses a data processor to process data on our behalf, we have a written agreement in place that covers data protection, in line with the requirements of the UK GDPR.

From time-to-time CCHA may collect and use additional information about you. This is on a case by case basis and you will be informed at the time any additional data is collected or shared.

If you are a Director or Board Member, CCHA may have to share information, such as your name, address, date of birth, occupation, voluntary work, other directorships held, nationality with the Financial Conduct Authority, Companies House and funders/banks. CCHA will inform you about this prior to any information being shared.

In exceptional circumstances we may share your data with other external consultants or solicitors where we require specialist or legal advice.

### **Use of automated decision-making or profiling**

The data is not used for:

- automated decision making (making a decision by automated means without any human involvement)
- profiling (automated processing of personal data to evaluate certain things about an individual)

### **Transference of your data outside of the UK**

We will not transfer or store your personal information outside of the UK unless

- The country that we send the information to is approved by the Information Commissioners Office as providing an adequate level of protection for personal information; or

- there is a written contract in place that include the standard contractual clauses approved by the Information Commissioners Office to make sure your data is safeguarded to the same standard as within the UK
- There is an applicable exception in data protection law that applies that allows us to transfer or store the data outside of the UK.

## Your Rights

### Your data protection rights.

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for a copy of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Please note that these rights may differ depending on the lawful basis under which we are processing your personal data. We may be entitled in certain circumstances to refuse requests or apply exemptions. You can find out more about your rights from the [Information Commissioner's Office Website](#).

Please contact [GDPR@castlesandcoasts.co.uk](mailto:GDPR@castlesandcoasts.co.uk) or in writing to Data Protection Officer, 5 Paternoster Row, Carlisle CA3 8TT if you wish to make a request.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [GDPR@castlesandcoasts.co.uk](mailto:GDPR@castlesandcoasts.co.uk) or in writing to Data Protection Officer, 5 Paternoster Row, Carlisle CA3 8TT

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

This privacy notice was last updated May 2023