

## **PRIVACY NOTICE (STAFF AND CONTRACTORS)**

Here at Citizen Housing Group Ltd (Citizen), we take your privacy seriously. Below, we detail what information we collect, why we collect it, who we share it with and how we safeguard it. We will only use your personal information to manage the employment relationship; however, we will share it appropriately with third parties.

For some information, we do not need to seek your consent to hold or process it as it is part of our performance of a contract. We obtain your personal identifiable information in order to conduct our normal business operations as a Registered Social Housing Provider. We collect and process a range of personal data relating to its employees to manage the employment relationship. We collect some location data through your use of your staff pass to access buildings and vehicle tracking software if you are a driver. This data can be used for a variety of purposes including Health & Safety, work efficiency and effectiveness, manage your use of facilities and resources, share information with law enforcement agencies for the prevention and detection of crime.

We wish to provide you with updates about events, services and other information that we believe are helpful to you in relation to the services that we can provide to you as an employee. We may communicate such information to you by post, telephone or email (unless you have registered with the appropriate Preference Service or have indicated to us that you do not require certain forms of communication). In the event that we perform monitoring, research and survey services we may use an external service company to contact you on our behalf. In such circumstances we ensure that legal obligations of confidentiality and information security are placed upon our service providers.

If at any time you wish that your information is not used for direct marketing please contact Human Resources Representative.

The Purposes for which we collect your personal data include the following:

- Employment;
- Learning and development;
- Regulatory purposes – e.g. requirements of the Regulator for Social Housing research;
- Occupational Health;
- Legal Proceedings;
- Health & Safety requirements for tenants, staff & Visitors;
- Prevention and reduction of crime including fraud;
- Provision of employee perks and benefits;
- Equal Opportunities monitoring; and
- Marketing, monitoring, research, survey.

Citizen Housing Group Ltd will never sell your information to third parties. For the purpose of this privacy notice we are the “controller” of your personal identifiable information as we determine the purposes and content of this information and the methods of processing. As a Registered Social Housing Provider, we are regulated by the Regulator of Social Housing (RSH).

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth (DOB) Hard copy documentation at rest</li> <li>• Address</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Gender</li> <li>• The terms and condition of your employment</li> <li>• Qualifications</li> <li>• Skills</li> <li>• Vehicle registration number</li> <li>• Experience and employment history including start and end dates, with previous employers and with the organisation</li> <li>• Information about your remuneration, including benefits such as pensions/insurance cover</li> <li>• Bank account details</li> <li>• National insurance numbers</li> <li>• Unique identification reference numbers and names e.g. payroll number, username, passwords, PINs</li> <li>• Marital status, next of kin, dependants and emergency contacts</li> <li>• Nationality and entitlement to work in UK</li> <li>• Details of your schedule (days of work and working hours) and attendance to work</li> </ul>	<p>Your contract of employment is a contract between you and Citizen. This data is used to set up and maintain your employment with us. Process and respond to your requests and incidents. To ask you to confirm your identity for security clearance.</p>	B	<p>Please see our <a href="#">Retention Policy</a></p>

<ul style="list-style-type: none"> <li>• Criminal Offence data/DBS checks</li> </ul>	Entering into a contract for employment purposes and assessment for continuing suitability for employment.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• CCTV</li> </ul>	For the prevention and detection of crime	F	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• Details of leave taken, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave</li> <li>• Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.</li> </ul>	Your contract of employment is a contract between you and Citizen. This data is used to set up and maintain your employment with us.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• Assessment of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence</li> </ul>	Your contract of employment is a contract between you and Citizen. This data is used to set up and maintain your employment with us.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• Medical or health conditions</li> <li>• Whether you have a disability</li> </ul>	Your contract of employment is a contract between you and Citizen. This data is used to set up and maintain your employment with us. This information may also be processed where it is relevant to an IT request.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• COVID-19 Vaccination information</li> </ul>	Health and Social Care Act 2008 (Regulated Activities) (Amendment) (Coronavirus) Regulations 2021. Citizen member of staff must prove they are fully vaccinated to enter a CQC Registered Care Home.	C	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• Equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief</li> </ul>	For analysis purposes, as required by our regulator and to provide information on extra services we provide. It is also a legal requirement for Citizen to require this information under Equal Opportunity Act 2010.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>• Partner and dependents (Name, address, email address &amp; DOB)</li> </ul>	These details may be required to access benefits which are provided to you through your contractual terms and conditions such as health care/medi cash and other employee perks and discounts through authorised third parties.	B	Please see our <a href="#">Retention Policy</a>

<ul style="list-style-type: none"> <li>Location and start stop time of a vehicle driver</li> </ul>	These details are required by HMRC; also in connection with undertaking any disciplinary procedure associated with a breach of Policy and for lone worker safety solutions in respect of Health & Safety responsibilities.	C	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Date, time and journey, braking, acceleration, idling, vehicle driver, cornering/driver behaviour.</li> </ul>	These details are collected to ensure that management analysis can be performed in relation to policy compliance.	B	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Telephone recordings of staff dealing with customers</li> </ul>	Retained for a period of 6 months to assess performance, service improvement, compliance with policy and potential disciplinary and legal proceedings	F	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Investigations and incidents</li> </ul>	Investigations and incidents including personal data breaches are retained for 6 years.	C	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Call Line Identification</li> </ul>	Your number is displayed on our telephones unless suppressed by yourself on your device. We hold a log of the phone number, date, time, duration of call and recording of conversation.	F	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Audio and visual images of you, such as photographs, films and audio recordings</li> </ul>	We use this to ensure appropriate communication between staff and external parties especially whilst working remotely, to facilitate meetings and training and to publicise the work we do.	A	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Marketing, survey, monitoring and research</li> </ul>	Activities associated with improving service delivery and the employee experience	F	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Former tenant arrears (bad debtors list)</li> </ul>	Obligation as a registered social housing landlord to maximise the collection of income and minimise any outstanding debts	F	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Safeguarding referrals (staff name and contact details)</li> </ul>	Information will be kept for a minimum period of 10 years in line with the Care Act 2014. For further information on Safeguarding, please visit <a href="https://www.citizenhousing.org.uk/safeguarding/#row2">https://www.citizenhousing.org.uk/safeguarding/#row2</a>	C	Please see our <a href="#">Retention Policy</a>
<ul style="list-style-type: none"> <li>Rewards and perks schemes (name, email address, delivery address, billing address, date of birth, gender, job title, starting and leaving date of employment, work location, telephone numbers, payment history, products and services provided, geolocation and IP</li> </ul>	These details are required by Citizen's chosen provider for employee rewards and perks schemes.	B	Please see our <a href="#">Retention Policy</a>

address, login data, browser type and version, operating system version and other technology on devices used to access site or services, profile data including username and password, feedback and survey responses, support history data.)			
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Types of Legal Basis					
<b>A</b> – Consent	<b>B</b> – Contract	<b>C</b> – Legal obligation	<b>D</b> – Vital interests	<b>E</b> – Public task	<b>F</b> – Legitimate interest

The organisation may collect this information in variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments. The organisation may collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law. Data will be stored in Citizen and contracted third party secure information systems.

How we use <b>Criminal Offence Data</b>
<p>We shall only use information about criminal offence data where the law allows us to do so. This will be where such processing is necessary for us to discharge our obligations and in line with our Data Protection Policy.</p> <p>Other instances whereby we need to process criminal offence data is in connection with legal claims, or where it is necessary to protect the physical, mental or emotional wellbeing of you or other individuals, and you are not capable in the circumstances of providing consent, or where the information has been made public. Some examples of processing will include:</p> <ul style="list-style-type: none"> <li>• To report incidents to third parties such as law enforcement or other agencies; and</li> <li>• To assess whether it is appropriate, for us to provide you, or continue to provide you with employment, including redeployment.</li> </ul>

The processing of criminal offence data will also take place in the course of legitimate business activities with all appropriate technical and organisational controls.

We are by law entitled to use your personal information in the manner described above and also in the public interest to discharge our duty of care to protect both vulnerable children, young persons and adults. We have in place an appropriate policy and controls, which we are required by law to maintain whilst processing such data.

#### Who do we **share** your data **with**?

Your information may be shared internally, including with members of the HR, payroll and recruitment team, Learning and Development Team, Health & Safety team, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for the performance of their roles. The organisation shares your data with contracted third parties (for further information please see <https://www.citizenhousing.org.uk/privacy>) In order to obtain pre-employment references from other employers, obtain employment background checks from contracted third-party providers and obtain necessary criminal records from the Disclosure and Barring Service. The organisation may also share your data with contracted third party providers in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements. The organisation also shares your data with contracted third parties that process data on its behalf in connection with payroll, the provision of benefits (e.g vehicle management, employee perks and benefits) and the provision of occupational health services. The organisation shares information with contracted third parties who meet the information security requirements set by GDPR and countries which have an adequate level of protection to personal data. The organisation shares your personal data with relevant agencies such as local government and the police in relation to safeguarding referrals.

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

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to safeguard 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. Our Data protection policy and procedures are available on our intranet One Place. Where the organisation engages contracted third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

#### Why does the organisation process personal data?

The organisation needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefits, pension and insurance entitlements. In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. In other cases, the organisation has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the organisation to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled including employee perks and benefits through third party partners such as medicash;
- obtain occupational health advice, to ensure 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;
- operate and keep a record of other types of leave (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;
- ensure effective general HR and business administration;
- provide references on request for current or former employees; and
- respond to and defend against legal claims.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities), or for example in relation to statutory public health initiatives to provide third parties such as CQC Registered Care Homes with assurances that Citizen staff who enter their premises are fully vaccinated in respect of COVID-19.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for those purposes of equal opportunities monitoring. Data that the organisation uses for the purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether, or not to provide such data and there are no consequences of failing to do so.

#### For how long does the organisation keep data?

The organisation will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are set out in the Data Retention Protocol document available on our intranet One Place and website

<https://www.citizenhousing.org.uk/privacy>

#### What if you do not provide personal data?

You have some obligations under your employment contract to provide the organisation with your 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 organisation 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 payment details, have to be provided to enable the organisation to enter a contract of employment with you.

#### Automated decision making

Employment decisions are not based solely on automated decision-making.

#### Monitoring, surveillance and video audio collaboration tools

The purposes for which we carry out monitoring and surveillance and use video audio collaboration tools:

Images and audio recordings of you will be captured in video audio collaboration and communication tools (e.g. Microsoft Teams, Zoom etc). The retention of such personal data will be in line with our Data Retention protocol.

When accepting an invitation to participate in a meeting using video audio collaboration tools you are agreeing to the following:

1. The purpose of this meeting will be in respect of Citizen's legitimate interests including but not limited to training and or administration of meetings
2. The personal data processed will include your image, your name, role, email address, work phone number, work location and work status.
3. This meeting may be recorded and you will be advised at the start of the meeting.
4. By joining the meeting you agree that everyone will be able to see each other, and any documents that are shared.
5. The personal data processed will be held in accordance with Citizen's Retention Schedule
6. The information mentioned at 2 above will be shared with external parties that you contact using Teams or Zoom.
7. Any additional use must be advised, e.g. stored on a video sharing platform in free text format.
8. Cookie Settings – You can adjust Cookie Settings to “Required Cookies” only.
9. For further information attendees must read [Citizen's Privacy Notice](#), and Privacy Statements of [Zoom](#) and [Teams](#).

Swipe card system to ensure the identification, security and health & safety of employees and by knowing their movements and last recorded location;

Lone worker safety solutions to ensure the health & safety of employees by knowing their location;

CCTV is used for the purposes of safety, security and detection of crime;

Vehicle tracking to comply with HMRC requirements and compliance with our policy on the use of assets by knowing the vehicle's location at a given time and place (start and stop time);

Information Security, confidentiality and data protection compliance is on the basis that Citizen has a legitimate interest in monitoring the behaviour of staff to prevent inappropriate behaviour or to prevent or detect an unlawful act



We may capture photographs, movement details or video images of you on CCTV in operation throughout Citizen controlled sites and offices, or on Citizen PAC system at controlled sites or offices.

Outside of these locations details of staff movement in relation to Health & Safety and Vehicle Management are captured respectively by lone worker safety solutions and vehicle tracking.

We are able to process your information for these purposes as we have a legitimate interest in ensuring the safety of our sites and a legal obligation to provide a safe working environment for staff. Data collected that is related to time spent on site and in connection with driving is necessary for the legitimate interests of Citizen in running its business operations and discharging its duty of care in connection with staff working hours.

Where we share information with third parties, we do so safely and via secure networks. This may be encrypted emails, or via secure portals into our network.

### Your rights

As a data subject, you have a number of rights. you can:

- access and obtain a copy of your personal data on request;
  - require the organisation to change incorrect or incomplete data;
  - require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- and

object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing. For further information on your rights please visit <https://www.citizenhousing.org.uk/privacy>

To exercise any of the above rights please contact Citizens Data Protection Officer (Mr Shane Murphy) on the address below. Overall responsibility for management of your data resides with Citizens senior information risk owner (Mr Ian Tinsley) at Citizen Housing Group Ltd, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN or [dataprotection@citizenhousing.org.uk](mailto:dataprotection@citizenhousing.org.uk)

Complaints can be lodged with the supervising authority at The Information Commissioner's Office: <https://ico.org.uk/concerns> or 0303 123 1113.

