

## Welcome to Alliance Homes' privacy statement



We respect your privacy and are committed to protecting your personal data. This privacy statement will tell you how we look after your personal data and tell you about your privacy rights.

This privacy statement is for anyone who works for us. This means any paid employment (including agency staff, consultants and Board members) or as a volunteer.

This privacy statement applies regardless of how you provide personal data to us, including the following circumstances:

- When you apply for employment with us
- If you work for us.
- When you use employment related services, provided by us or our contractors
- When you use our website and our intranet
- If you have contacted us with a problem or query

### **Important information and who we are**

#### *Purpose of this privacy statement*

This privacy statement tells you how Alliance Homes collects and processes your personal data obtained by any method, including data you may provide through our website, when you make an enquiry, apply to work for us, start working for us, participate in any work related training, undertake reviews of your performance, or request to use or be supplied with any of our services.

We have a separate privacy statement for people who live in our homes or who use our specialist support services. If you work for us and you apply for housing with us, or for one of our support services, then we will give you further information about the personal data that we will need and how we'll use it.

It is important that you read this privacy statement together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy statement supplements the other notices and is not intended to override them.

#### *Third-party links on our website*

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## *Controller*

Alliance Homes is the controller and responsible for your personal data (collectively referred to as “we”, “us”, or “our” in this privacy notice).

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

## *Contact details*

Our full name: NSAH (Alliance Homes) Limited is a charitable housing association registered with the Homes and Communities Agency (number L4459). NSAH (Alliance Homes) Limited is a registered society under the Co-operative and Community Benefit Societies Act 2014 (registration number IP29804R). Registered office: 40 Martingale Way, Portishead, North Somerset, BS20 7AW

Other members of the Alliance Homes Group are Alliance Homes (Ventures) Limited, Alliance Living Care Limited, Alliance Homes Partnerships Limited.

ICO registration number: Z9355710

Name or title of data protection officer: Director of Governance & Compliance

Email address: philippa.armstrong-owen@alliancehomes.org.uk

Postal Address: 40 Martingale Way, Portishead, North Somerset, BS20 7AW

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender or image.
- Contact Data includes home address, email address and telephone numbers necessary for us to enter into an employment contract with you and to fulfil our obligations under that contract. Dependant and emergency contact details.
- Performance data includes your appraisals, objectives, attendance, references, and any disciplinary, performance or grievance cases and outcomes (including informal).

- Personal development data includes training, one to ones, qualifications and work related achievements.
- Financial Data includes payroll number and bank account details so that we can pay you. It also includes tax and pension details in connection with your employment with us.
- Education and Employment data includes your education and employment history, dates, qualifications, salary or other remuneration, references and your right to work. For Board members only, any other non-executive directorship.
- Communications Data includes information we send to you about the Company, its services and activities so that you are aware of our overall purpose

We also collect, use and share Aggregated Data such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as you cannot be identified from this data. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect Special Categories of Personal Data this includes:

- Information about your health where that is necessary for us to assess and provide an appropriate working environment, to monitor absence and to provide occupational health services.
- Information about your ethnic origin, sexual orientation, disability, and religion We never use this to make decisions about any individual; we will use it only to help us monitor and review whether we are providing our services equally. We will always allow you to choose whether you give us this data.

We may also collect information about criminal convictions and offences. We will ask for your consent when we do this and explain what data we collect and how we will use it. Principally this will be in connection with roles requiring DBS clearance.

We will also process information from Board members to comply with 'fit and proper person' requirements.

#### *If you fail to provide personal data*

Where we need to collect personal data by law, under the terms of an employment contract we have with you, or to assess your application to work for us and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to decline your application or terminate your employment have with us but we will notify you if this is the case at the time.

#### **How is your personal data collected?**

Direct interactions. You may give us your Identity, Contact, Development, Performance, Education and Employment and Financial Data by filling in forms (including applications via our recruitment portal) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you

- apply for employment,
- start work for us

- take part in training, personal development and performance activities
- interact with our systems and processes
- use services we provide in relation to your employment.

We use different methods to collect data from and about you including when:

- you apply for employment;
- you create an account on our website;
- you subscribe to our services or communications;
- you undertake training, personal development, performance reviews;
- we review and update internal records about your employment, performance, training and attendance

Automated technologies or interactions. As you interact with our intranet, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy on our website for further details. We may also monitor and record telephone calls. CCTV cameras operating at our offices or estates may record your image.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Department of Work and Pensions;
- HM Revenue & Customs;
- Other employers and any character references you provide;
- Providers of training and other employment related services;
- Health Authorities or Health Professionals.
- Courts

### **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you; for example, to pay your salary.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; for example, to provide training for colleagues.
- Where we need to comply with a legal or regulatory obligation and appropriate safeguards are in place to protect your fundamental rights; for example, to provide information to HMRC about tax or to provide information to Companies House about Directors.
- Where it is necessary for the establishment, exercise or defence of legal claims.
- Where it is necessary to comply with employment law or other lawful health and social care purposes.
- For reasons of substantial public interest.
- Where we have your explicit consent. Generally we do not rely on consent as a legal basis for processing your personal data other than:

- when we receive applications for employment we will seek consent to process data to enable us to assess an application and
- in relation to data about criminal convictions.

Where we do rely on consent we will always explain what data we are collecting and why, and ask you to make a positive choice to consent. You have the right to withdraw consent at any time by contacting us.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as an applicant for employment	(a) Identity (b) Contact (c) Education and Employment (d) Special Category Data (e) Criminal convictions	(a) Your consent (b) Necessary for the purpose of carrying out our obligations in law (c) Necessary for reasons of substantial public interest (d) Necessary for our legitimate interest (e) Necessary to comply with employment law or for lawful health reasons
To manage employment with us including: (a) fulfil our obligations to you, including any payment (b) monitor and manage your performance in fulfilling your obligations	(a) Identity (b) Contact (c) Performance (d) Personal development (e) Financial (f) Education and Employment (g) Communications (h) Special category data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Necessary for the purpose of carrying out our obligations in law (d) Necessary to comply with employment law or for lawful health reasons such as assessing your working capacity

	(i) criminal convictions	
To administer and protect our operations	(a) Identity (b) Contact (c) Education & employment (d) Special Category Data (e) Criminal convictions (f) Performance (g) Personal Development (h) Financial	(a) Necessary for our legitimate interests (b) Necessary for the purpose of carrying out our obligations in law (c) Necessary for reasons of substantial public interest (d) With your consent (e) Necessary to comply with employment law of for lawful health reasons

Examples of what we mean by “lawful basis” are:

1. To perform a contract (primarily a contract of employment):

a) to take steps prior to entering into the contract such as checking references, qualifications, skills and aptitude.

b) to decide whether to enter into it

c) to manage and perform the contract; to fulfil our obligations and responsibilities, for example to pay you

d) to update records

e) to contact you about the contract, your employment records, salary, pension and other benefits provided by us in the course of your employment.

2. For our legitimate interests, or for those of other people or organisations:

a) for the good governance and good management of our business and website.

b) for the good management of our homes, communities and services

c) for the good management of our facilities and the people who use them

d) for the good management and development of our people and to deliver our objectives as a good employer.

e) for market research, analysis and developing statistics

f) to send communications about our business and it's objectives

g) to establish and defend our legal rights

h) in the event of a merger, reorganisation or restructuring.

3. To carry out our obligations in law:

a) dealing with requests under data protection law and regulation

b) for activities relating to the tax, national insurance, pension and requirements of a Court

c) to verify identity and check right to work status

4. Reasons of employment, health and research

a) performing obligations under employment, health and safety legislation.

b) occupational health and the assessment of capacity to work.

c) making reasonable adjustments when needed

5. Reasons of substantial public interest:

a) to monitor and review equality of opportunity to access our products, services and during employment

b) prevention of fraud, money laundering, crime (eg modern slavery).

*Cookies on our website*

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

*Change of purpose*

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law, for example where there is a medical emergency or safeguarding issue.

*Sharing your personal data*

We may have to share your personal data with the parties set out below:

- Service providers acting as processors who provide recruitment, training, IT, payroll, pension, reward offer, expenses and system administration services.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, Department of Work and Pensions, and other government departments based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Statutory and regulatory bodies including the Health & Safety Executive, Homes for England, Regulator of Social Housing, where we are under a legal or regulatory obligation to provide them with your personal information.

- The emergency services and service providers who act in an emergency where that is necessary to protect the safety of our staff.
- Occupational health, health professionals in connection with occupational health matters.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other operations or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- In an emergency, with another party where doing so will protect a person's vital interest.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also share data with anyone else if you ask us to do so, for example landlord references, enquiries you make through a third party, at your request.

### *International transfers*

We do not transfer your personal data outside the European Economic Area (EEA).

### *Data security*

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data retention**

#### *How long we will use personal data for.*

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where we collect data in order to assess your application to work for us we will keep that data only for as long as we need it to make the assessment, to deal with any queries that arise from that decision, and to enable us to review items of public interest.

For legal reasons we have to keep basic information about our employees (including Contact, Identity, Financial and Education and employment Data) for six years after they cease working for us.

Whilst we have general retention periods, we may need to depart from these from time to time where there is good reason to do so, for example where there are statutory or regulatory requirements, or we need to keep the information to deal with any legal claims.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you

## **Your legal rights**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where

- there is no good reason for us continuing to process it;
- you have successfully exercised your right to object to processing (see below);
- we have processed your information unlawfully
- we are required to erase your personal data to comply with local law.

We will not be able to comply with your request where any of the above apply: otherwise, we will usually agree but may not always be able to do so for legal reasons which we will explain.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) or acting in the public interest if you consider that your personal circumstances mean that this detrimentally impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data

- if you want us to establish the data’s accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Withdraw consent at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact us in writing via email to [andy.perry@alliancehomes.org.uk](mailto:andy.perry@alliancehomes.org.uk), by post to Andy Perry, Corporate Compliance Manager, Alliance Homes, 40 Martingale Way, Portishead, North Somerset, BS20 7AW or by telephone 01275 398085.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### *What we may need from you*

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### *Time limit to respond*

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.