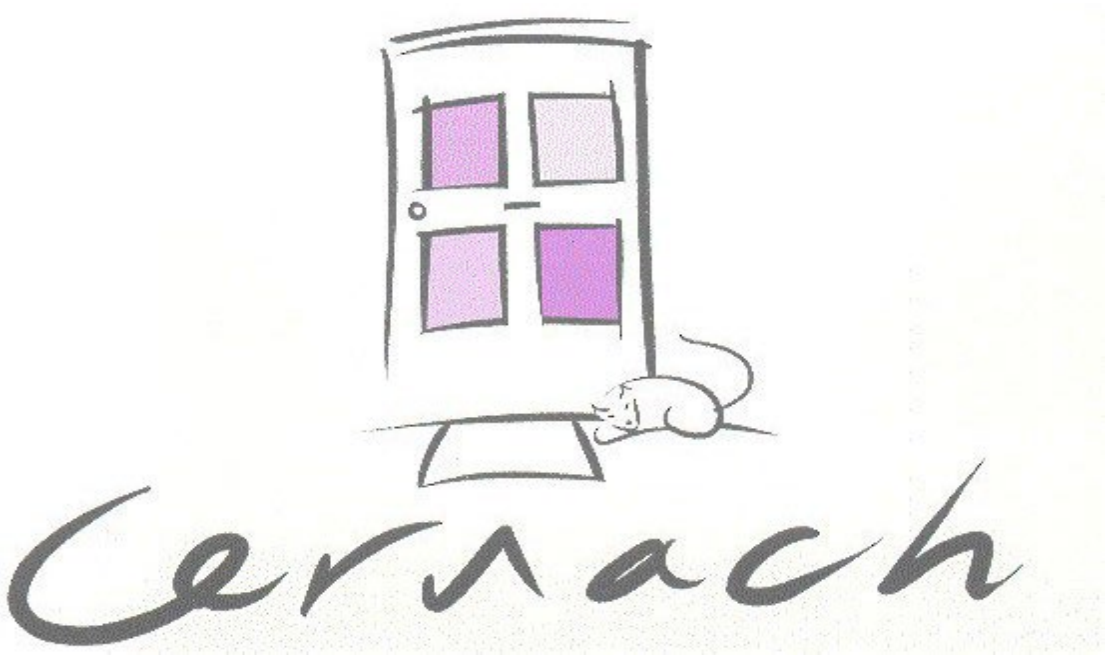


STAFF PRIVACY NOTICE

(How we use your personal data)

Date adopted: October 2026

1. Introduction

1.1 This notice explains what personal data we collect when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will process your personal data.

1.2 The purpose of this staff privacy notice is to explain to you the reasons which we may hold and use your personal data and explain your rights under the current data protection laws.

1.3 As your employer we may collect and process personal data relating to you to manage our contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you.

1.4 This notice does not form part of your contract of employment or engagement with us. It applies to all our employees, workers, volunteers, and consultants (which includes applicants), regardless of length of service, and may be amended at any time. If any amendments are required in the future, we will notify you as is appropriate.

1.5 **Cernach Housing Association 2000** of: **Marion McDonald House 79 Airgold Drive, Glasgow, G15 7AJ** is registered as a data controller with the Information Commissioner ('ICO') and our registered number is **Z5533599**.

1.6 If you do not wish to provide your personal data

You have obligations under your employment contract to provide the organisation with the necessary 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 Association 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.

1.7 Certain information, such as contact details, your right to work in the UK and the payment details, have to be provided to enable the Association to enter into a contract of employment with you. If you do not provide other information, this will hinder the Association's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

2. Where does your personal information come from?

2.1 The Association may collect information in several ways which include:

- Personal data which you have provided to us
- Recruitment processes including information obtained from agencies
- Your identification documents you have given us
- Background checks conditional for your engagement with us (if relevant)
- PVG/Disclosure/DVLA checks relating to criminal convictions/offences
- Former employers or other individuals whom you have given us permission to contact to provide us with a reference.
- Medical professionals provide us with appropriate health information in order that we can manage any health- related situations that may have an impact on your ability to work with us.
- Membership with professional bodies that confirm membership
- Qualifications/training bodies that provide us information relating to you
- Web browsing history and email exchanges can be routinely monitored for the purposes of maintaining the IT infrastructure
- HMRC

3. What Information do we collect?

3.1 The Association controls and processes a range of information about you. In this privacy notice 'your personal information' means your personal data i.e., information about you from which you can be identified. Your 'personal information' does not include data where your identity has been removed (anonymous data). It is really important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

3.2 This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender.
- your CV and interview assessment form.
- your job specification, offer of employment, acceptance, and your employment contract.
- your qualifications, training records and certificates.
- information about your remuneration, entitlement to benefits and expenses claimed, including entitlement to benefits such as pensions or insurance cover.
- details of your bank account and national insurance number.

- information about your next of kin and emergency contacts.
- information about your nationality and entitlement to work in the UK.
- details of your days of work and working hours and attendance at work.
- details of periods of leave taken by you, including holiday, sickness absence, family leave and the reasons for the leave.
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence; and
- CCTV images and footage from cameras, in public areas inside and outside our offices (notices are displayed where CCTV is in operation)
- Multi factor authentication

3.3 The data we hold about you will be kept in your personnel file which is stored securely and access to the files is restricted. The information will only be held for the periods outlined in the Association's Retention Policy.

4. What is the legal basis for us processing your personal data

4.1 We will only process your personal data on one or more of the following legal bases:

- contract
- consent
- our legitimate interests (including CCTV, next of kin details, remote staff working devices, newsletters and recognised legitimate interests in accordance with the Data (Use and Access) Act 2025)
- vital interests
- the performance of a task carried out in the public interest and / or with official authority
- legal obligation

Processing Special Category Personal Data

4.2 Special categories of information mean information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences, or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

4.3 The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information.

5. Our obligations as employer

5.1 We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leave of absence, which may include sickness absence or family related leave, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

5.2 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

6. Employee Monitoring

6.1 We will carry out the following monitoring exercises:

- CCTV – images and footage recorded of any person visiting our premises. This is used for staff safety, security, and the prevention (detection) of crime. Footage is currently retained for 1 month
- Wi-fi Browsing – Our I.T. provider can monitor web browsing history and email exchanges for the purposes of maintaining the IT infrastructure

7. Data safety

7.1 Where do we keep your data?

Your information will only be processed within the UK except where international transfers are authorised by law.

7.2 How do we keep your data safe?

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All personal data is processed in accordance with Cernach Housing Association's data protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

7.3 How long do we keep your data?

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law and in accordance with our Retention Policy and Schedule.

7.4 Who might my data be shared with, or seen by?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to complete a regulatory return in relation the Management Committee
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators such as auditors, the Scottish Housing Regulator and other regulatory body involved in any complaint, whether investigating the complaint or otherwise;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations.

8. Your Rights

8.1 You have the right at any time to request to exercise your data subjects' rights in relation to the following:

- the right to be informed
- the right to access
- the right to rectification

- the right to object to processing
- rights in relation to automated decision making and profiling
- the right to be forgotten
- the right to data portability
- the rights to restrict processing

9. Queries and Complaints

9.1 Any questions relating to this notice and our privacy practices should be directed, in the first instance, to our Corporate Services Officer or by telephoning 0141 944 3860. Our Data Protection Officer is provided by RGDP LLP and can be contacted by email: info@rgdp.co.uk

9.2 You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Telephone: 0303 123 1113
Online: Make a complaint | ICO

Signed **Date**

Acknowledgement of receiving and reading this notice

I _____ [print name] confirm that I have read and understood the contents of this Staff Privacy Notice.