

Colleague Privacy Notice

Privacy matters

As a Broadacres colleague, your privacy matters. So, we have produced this notice to explain what personal information we may collect from you as a colleague, what allows us to collect and process personal information we hold about you, how and why we use your information, and when we might share it with others. We will also explain your rights relating to your information, and how we store and transfer it.

This notice relates to colleagues of Broadacres (which includes all colleagues (whether temporary or permanent), board and committee members, workers, contractors, agents, volunteers and representatives).

Further information about the matters set out in this notice is contained in our online Privacy Policy, which you can find on our website at <http://www.broadacres.org.uk/privacy-policy>

Personal information we may collect about you

We may collect the following types of personal data from you as a colleague which we have grouped together as follows:

- **personal details:** such as your name, date of birth, gender, nationality, marital status, national insurance number, photograph, video footage, user ID or similar identifier and uniform size;
- **Contact details:** such as your address, email address, telephone number and other contact details you provide.
- **confirmation of your identity:** such as a copy of your passport, birth certificate, driving licence;
- **financial details:** such as your bank account, payroll records, tax status information, salary history, pension and benefits; student loans and information to enable trade union payments;
- **Information about your family members:** such as dependents, next of kin and emergency contact details.
- **recruitment information:** such as copies of right to work documents, references, and other information you provide in your CV and/or job application form or cover letter as part of the application process, including employment history, education information, and qualifications for the role;
- **information about your previous employment/appointments:** such as job titles, work history, working hours, training records, professional memberships, salary / compensation history);
- **information about your employment with us:** such as the start date, location of employment/workplace, adjustments to working conditions, history of vehicle allocation (including speeding tickets and parking fines whilst driving one of our fleet vehicles), details of your personal vehicle, HIVE survey feedback and subscriptions;
- **your performance with us:** such as appraisal information, colleague and customer feedback, completion of training modules, and disciplinary and grievance information;
- **information about your Health, Safety and Welfare:** such as details of accidents and incidents, annual health surveillance checks, monitoring, test results of HAV's, mask face fit measurements;
- **security and tracking information:** such as ID badge to access buildings, location data from vehicles to monitor use and safety, location data from our lone worker system to ensure you remain safe, location data for health and safety accidents and CCTV images when on our premises. We may also capture your image on the dashcams installed on our vehicles.
- recordings of telephone conversations made to/received by our **lone worker monitoring system**;
- details about potential or actual conflicts of interests; and
- information to assess **shareholder eligibility** and process applications (board members only).

Some of the information which we collect about you may be “special categories of personal data”. Special categories of data require a greater level of protection. The special categories of personal data about you which we may collect include:

- information about your **race or ethnicity, religious beliefs, sexual orientation and political opinions** such as the information you provide us for diversity monitoring;

- **trade union membership;**
- information about your **health, including any medical condition or disability, health and sickness records;** and
- information about **criminal convictions and offences,** including DBS checks.

How is your personal information collected?

The information which we collect about you will be obtained through different sources which include:

- from you **directly** as part of the recruitment process;
- from **third parties** as part of the recruitment process (such as employment agencies, background check providers, former employers, credit reference agencies), HMRC and from our various partners; and
- information obtained about you in the **course of job-related activities** throughout the period of your employment with us.
- from CCTV footage at office buildings and dashcams on our fleet vehicles.

What allows us to collect and hold personal information about you

Data protection law requires us to have a lawful basis for collecting and using the information we hold about you. The main lawful basis for us holding this information is the contract of employment/service you have with Broadacres; holding and processing the information is necessary to enable us to perform our obligations to you under that contract.

Some other processing of your information is done because we have a legal obligation to do so. For example:

- We have a legal obligation to provide certain information to HMRC for tax purposes, a legal duty to prevent fraud and complete right to work checks .
- We must also provide information to pension providers to comply with our legal obligations relating to auto-enrolment.
- We may also need to provide statistical information relevant to matters such as Gender Pay Gap, though we will always anonymise such information.

Some other information may be processed because Broadacres or an outside body has a “legitimate interest” in processing the information. We will always ensure in such cases that such processing meets legitimate interests and does not unduly infringe your rights to privacy. For more information, please refer to our Privacy Policy which you can find on our website at <http://www.broadacres.org.uk/privacy-policy>

How and why we use your information

We will use your information in the following ways:

- To process your job or role application.
- Day to day management of your employment/appointment and ensure we are able to meet our contractual and legal obligations to you
- To confirm your entitlement to drive.
- To monitor and manage your performance and ensure that you receive the necessary training, equipment and ICT support to do your role.
- Ensure that you are paid correctly.
- Ensure that your tax and national insurance is paid correctly.
- Ensure that you receive the correct colleague benefits relevant to your role such as annual leave, pension and subscriptions.
- Send you communications relevant to your work or to Broadacres’ activities generally.
- Monitor the demographic makeup of our colleagues, to help us ensure our recruitment and employment practices are fair and equitable.

- Ensuring your health and safety at work.
- Invite you to participate in colleague surveys to help us improve your employment environment.

When might we need to share your information with others?

We may need to share your information with the following:

- HMRC, for example information about your pay;
- pension providers (including auto-enrolment partner NEST and other pension providers);
- student loan companies to make required deductions from your pay;
- benefits provision and administration (for example eye test vouchers, childcare vouchers);
- occupational health provider;
- IT service providers (including, iTrent, AllPay, Orbis, Innovate etc.);
- other organisations involved with a sale or transfer of services in which you are involved;
- regulators and other professional registration organisations;
- public sector agencies to prevent and detect fraud;
- our insurers;
- commissioners and safeguarding authorities;
- Ministry of Justice and law enforcement agencies;
- our professional advisors (such as our lawyers, PR firm, internal and external auditors);
- Health and Safety Executive (HSE);
- third party training companies to facilitate your attendance;
- to provide employer references;
- Disclosure and Barring Service; and
- our Facebook workplace page.

Where we store your information and transfers

- We store your information on our servers which are within the United Kingdom (UK).
- We hold this information securely, with robust technical measures such as passwords and encryption.
- Although everything we do is in the UK, we may need to transfer information outside the UK where our contractors or suppliers operate or hold information outside the UK; before we do this, we will ensure there is adequate protection to keep your information secure.
- We use iTrent, an externally based system to provide a colleague self-service facility to manage colleague payroll, sickness, development, emergency contact details and holiday records; this is where most of your data is saved.

Your rights relating to your information

Data protection law gives you rights relating to your personal information. These include:

- The right to see information we hold about you (but there are some exceptions to this right).
- The right to make us correct your personal information if it is not accurate (if you do find that the information we hold on you is incorrect or inaccurate, you should inform us as soon as possible to update our records).
- The right to withdraw consent to some use of your personal information.
- The right in certain circumstances to “be forgotten”, that is, for us to delete information we hold about you.

To exercise any of your rights under data protection law, you should contact either your line manager or Broadacres’ Data Protection Officer either by:

- Post – the Data Protection Officer, Broadacres Housing Association, Broadacres House, Mount View, Standard Way, Northallerton, North Yorkshire, DL6 2YD.
- Email – dataprotection@broadacres.org.uk
- Phone: 01609 767900.