

Employee Privacy Notice

Wolverhampton Homes collects and processes personal data relating to its employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does Wolverhampton Homes collect?

We collect and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender
- photos of you in relation to your job role
- the terms and conditions of your employment
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Wolverhampton Homes
- information about your salary, including entitlement to benefits such as pensions
- details of your bank account and national insurance number
- information about your marital status, next of kin, dependents and emergency contacts
- information about your nationality and entitlement to work in the UK
- information from DBS checks
- details of your working hours and attendance at work
- details of periods of leave taken by you, including holiday, sickness absence, other types of 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, 121's, training records, performance improvement plans and related correspondence
- information about medical or health conditions, including whether or not you have a disability for which Wolverhampton Homes needs to make reasonable adjustments
- details of trade union membership
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, age, religion or belief

We collect this information in a variety of ways. For example, data is collected through application forms, CVs or resumes, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the

start of or during employment, from correspondence with you, or through interviews, meetings or other such assessments.

Information can also come from third parties such as references and DBS checks where it is required for the role.

Data is stored in a range of different places, including in your personnel file, in Wolverhampton Homes' HR system and other IT systems (including the organisations email).

Why does Wolverhampton Homes process personal data?

We need to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit and pension entitlements.

We need to process data to ensure that it is complying with our 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, to enable employees to take periods of leave to which they are entitled, and to consult with employee representatives if redundancies are proposed or a business transfer is to take place.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

- run recruitment 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.
- obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving 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 Wolverhampton Homes 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
- conduct employee engagement surveys
- provide references on request for current or former employees
- respond to and defend against legal claims
- maintain and promote equality in the workplace

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 and for health and safety purposes). Information about trade union membership is processed to allow Wolverhampton Homes to operate check-off for union subscriptions.

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation, age, religion or belief, this is done for the purpose of equal opportunities monitoring. Data that we use for these 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 for failing to do so.

Who has access to the data?

Your information will be shared internally, including HR team, recruitment panels, payroll, 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.

Your data may also be shared with employee representatives in the context of collective consultation on a redundancy or business transfer. This would be limited to the information needed for the purposes of consultation, such as your name, role and length of service.

Wolverhampton Homes shares your data with third parties in order to obtain references and DBS checks where required for the role. The organisation may also share your data with third parties in the context of a TUPE transfer, in those circumstances the data will be subject to confidentiality arrangements.

Wolverhampton Homes also shares your data with third parties that process data on its behalf, such as payroll, pension provider and occupational health services providers.

How does Wolverhampton Homes protect data?

We take the security of your data seriously. We have internal policies and controls in place to try and ensure that your data is not lost, accidentally destroyed, misused or

disclosed, and is not accessed except by our employees in the performance of their duties.

Where Wolverhampton Homes engages 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.

For how long does Wolverhampton Homes keep data?

Wolverhampton Homes will hold your personal data for the duration of your employment. The period for which your data is held after the end of employment is seven years (40 years for medical records).

Your rights:

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

- access and obtain a copy of your 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 purposing of processing
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisations legitimate grounds for processing the data

If you would like to exercise any of these rights please contact
hr@wolverhamptonhomes.org.uk

If you wish to make a subject access request, please email
DP@wolverhamptonhomes.org.uk

If you believe that Wolverhampton Homes has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You have some obligations under your employment contract to provide Wolverhampton Homes with 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 Wolverhampton Homes 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 Wolverhampton Homes to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.