

EMPLOYEE PRIVACY STATEMENT

Islington & Shoreditch Housing Association Limited

1. Your personal data – what is it?

Personal data means any information which relates to you or identifies you as an individual.

2. What type of personal information do we collect?

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

- Your name, address and contact details, including e-mail addresses, telephone numbers, date of birth
- Details of your qualifications, skills, experience, and employment history, including start and end dates, with previous employers, and with ISHA
- Information about your remuneration including entitlement to benefits such as pension
- Details of your bank account and national insurance number
- Information about your next of kin, dependants, and emergency contacts
- Information about your nationality and entitlement to work in the UK
- Information about your criminal record, if relevant to your role
- Details of your schedule (days of work and working hours) and attendance at work
- Details of periods of leave taken by you including holiday, sickness absence, dependency and bereavement leave, family leave such as maternity, paternity, and parental leave and the reasons for the leave
- Details of any disciplinary, performance, sickness absence or grievance procedures in which you have been involved including any warnings issued to you and related correspondence
- Assessments of your performance including appraisals, one to ones and performance improvement plans and related correspondence
- Information about medical or health conditions, including if you have a disability that ISHA needs to make reasonable adjustments
- Equal opportunities monitoring information including information about your ethnic origin, disability, gender, sexual orientation, religion, or belief
- CCTV images

We may collect this information in a variety of ways. This could be from application forms, CVs, your passport, or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as benefit nomination forms), from correspondence with you or collected through interviews, meetings or other forms of assessment including on-line assessments/tests.

We may also collect personal information about you from third parties. This includes references from previous employers and information from criminal records checks permitted by law.

Your data will be stored in a range of various places including on your digital personal file, and in our HR management systems, the payroll system and on other IT systems (including our e-mail system and the door entry system).

3. Who are we?

ISHA is the data controller (contact details below). This means it decides how your personal data is used and for what purposes.

4. How do we use your personal data?

ISHA collects and processes personal data relating to its employees to manage the employment relationship. We are committed to doing so transparently and fairly and to treat your information with the utmost care and confidentiality to meet our data protection obligations.

ISHA complies with its obligations under Data Protection legislation by keeping personal information up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal information from loss, misuse, unauthorised access, and disclosure and by ensuring that appropriate technical measures are in place to protect personal information.

5. What is the legal basis for processing your personal data?

We need to process data to enter 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 your pension and any other entitlements to benefits.

In some cases, we need to process your data to make sure we are complying with our legal obligations. For example, we are required to check that employees are entitled 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, 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 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 for workforce management purposes
- Operate and keep a record of absence and absence management procedures to allow effective workforce management and ensure 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 employees are receiving the pay 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 ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefit to which they are entitled
- Ensure effective general HR, payroll, and business administration
- Provide references on request to current or former employees
- 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).

We process special categories of data such as information about ethnic origin, sexual orientation or religion or belief. This is done for the purposes of equal opportunities monitoring. Data that we use for these purposes is collected with the express consent of employees which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

6. Sharing your personal data

Your information may be shared internally. This includes members of the HR team, payroll staff, managers in the business area where you work (or in a different business area if you have applied for a different role) and IT and business support staff, if access to the data is necessary for the performance on their role.

We share your information with a third parties to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service.

We will also share your data with third parties that process data on our behalf in connection with payroll, recruitment, provision of benefits, and provision of occupational health services.

We may undertake the transfer of your personal data to countries outside of the United Kingdom, for example when a processor holds their data in the EU. When doing this, we ensure we comply with the UK GDPR's rules around international transfers.

7. How do we keep your information safe?

We understand the importance of security of your personal information and take appropriate steps to safeguard it. We have internal policies and controls in place to make sure that your data is not lost, accidentally destroyed, misused, or disclosed and is not accessed except by our employees in the proper performance of their duties.

All staff who have access to your data have undertaken GDPR training and understand how to use your information in a secure and sensitive way. All hard copy personnel files are kept in locked cabinets when not in use. Information on e-mails is encrypted or password protected and information in databases is password protected. We regularly review our IT provision to make ensure security and that we have is fit for purpose.

Where we engage third parties to process data on our behalf, we do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. How long do we keep your personal data?

We will hold your personal data for the duration of your employment. The period for which your data is held after the end of your employment is 6 years, as set out in our Data Retention Guidelines.

9. Your rights and your personal data

Unless subject to an exemption under data protection legislation, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which ISHA holds about you;
- The right to request that ISHA corrects any personal data if it is found to be incorrect or incomplete;
- The right to transfer personal data from our electronic processing system to another organisation's electronic processing system;
- Require ISHA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing;
- Where we rely on your consent as your legal basis to process your personal data, you have the right to withdraw your consent and ask for your data to be deleted or restrict/object to some elements of the processing. As we explain above, we will not rely on consent in many cases;

- The right to raise a data protection complaint with us about how we handle your personal data; and
- If you are not satisfied with our response to your data protection complaint, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

10. Erasure (Your Right to be Forgotten)

You have the right to ask us to delete personal information we hold about you. You can do this where:

- The information is no longer necessary in relation to the purpose for which we originally collected/processed it
- You withdraw consent
- You object to the processing and there is no overriding legitimate interest for us continuing the processing
- We unlawfully processed the information
- The personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- Where we have an overriding legitimate interest for continuing with the processing
- To exercise the right of freedom of expression and information
- To enable functions designed to protect the public to be achieved e.g. government or regulatory functions
- To comply with a legal obligation or for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- Archiving purposes in the public interest, scientific research historical research or statistical purposes
- The exercise or defence of legal claims

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Statement, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

12. What if you do not provide personal data?

You have some obligations under your employment contract to provide us with data. In particular, you are required to report absences from work, provide medical fit notes, 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 us with data 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 must be provided so that we can enter a contract of employment with you. If you do not provide certain information, this will hinder our ability to administer the rights and obligations arising because of the employment relationship efficiently.

13. Automated decision making

Employment decisions are not based on automated decision-making.

14. Who do you contact about your personal data?

To exercise your data protection rights, raise a concern, or make a data protection complaint, please contact ISHA in the first instance at:

Email: dataprotection@isha.co.uk

Telephone: 0300 131 7300

15. How can you escalate a data protection complaint?

If you have already raised a data protection complaint with us and are not happy with our final response (or how we handled your data), you have the right to lodge a complaint with the Information Commissioner's Office (ICO) on:

Telephone: 0303 123 1113

Via their website: <https://ico.org.uk/make-a-complaint/>

Version 3, approved by ISHA's Data Protection Group, May 2026