Manor Estates Housing Association
Staff / Applicant Privacy Notice
(How we use your personal data)

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 information.

Introduction

The purpose of this 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. As your employer / potential employer we may collect and process personal data relating to you to manage our contract, including pre-contractual negotiations, 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.

This notice does not form part of your contract of employment or engagement with us. It applies to all our employees, workers, volunteers, apprenticeships and self-employed 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.

Who are we?

Manor Estates Housing Association is a Scottish Charity (Scottish Charity Number SCO23106), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2484R(S) and has their Registered Office at Suite 4, 5 New Mart Place, Edinburgh EH14 1RW.

We take the issue of security and data protection very seriously and strictly adhere data protection legislation, including the UK General Data Protection Regulation, the Data Protection Act 2018, the Data (Use and Access) Act 2025 and Privacy and Electronic Communications Regulations.

We are registered as a Data Controller with the Office of the Information Commissioner's Office under registration number Z6870536 and we are the data controller of any personal data that you provide to us.

How we collect information from you and the type of information we collect

We collect information about you:

- When you apply for employment with us;
- When you are appointed to a post with us;
- If there are any changes to your circumstances that, as an employer, we need to know about;
- When your employment with the Association comes to an end.

Where does your personal information come from?

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

What Information do we collect?

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.

This includes:

- Your name, address, and contact details including email address and telephone number, date of birth and gender
- The terms and conditions of your employment or engagement with us
- Details of your qualifications, skills, experience and work history, including start and end dates with previous employers and workplaces
- Information about your remuneration, including entitlement to benefits such as, pay, pension and holidays
- Details of your bank account and national insurance number
- Information about your marital status, next of kin, dependants and emergency contacts
- Information about your nationality and entitlement to work in the UK
- Information about any criminal convictions if relevant for your job.
- Details of your work pattern (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 sabbaticals
- 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
- Information about medical or health conditions, including if you have a disability for which the organisation needs to make reasonable adjustments
- Equal opportunities monitoring information including protected characteristics
- Video recordings
- Telephone call recordings

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.

Why we need this information about you and how it will be used

We need your information and will use your information for:

- Administration of contracts of employment;
- Payment of salaries
- Monitoring and managing leave and absence
- Recruitment, selection and promotion exercises;
- Pensions administration and the processing of associated benefits;
- Appraisal and training purposes;
- Membership of professional bodies;
- Payment of Child Care Vouchers;
- Administration of child support and maternity payments;
- Administration of payments as a result of wage arrestment;
- Contacting next of kin in the event of emergencies;
- Responding to reference requests

Sharing of your information

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK/EEA. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- To process your monthly salary payments and to allow your electronic payslips to be produced and issued;
- To allow your pension provider to process pensions information and handle your pension;
- Investigating complaints;
- Providing details to an Occupational Health Specialist;
- If we enter into a joint venture or merge with another business entity, your information may be disclosed to our new business partners or owners

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

The lawful basis for processing your personal data

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent
- We have a contractual obligation, including pre-contractual negotiations
- We have a legal obligation
- We have a vital interest
- When undertaking a public task
- We have a legitimate interest, including lone staff remote working, references, next of kin details, newsletters and recognised legitimate interests in accordance with the Data (Use and Access) Act 2025

Processing Special Category Personal Data

Special categories of information means 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.
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.

We may process special categories of personal information, including in the following situations:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our privacy policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our Privacy Policy.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Our Obligations as Employer

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.

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.

Transfers outside the UK

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

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Your records will be stored in your HR file on SharePoint and can be accessed only by the CEO and members of the Senior Management Team. Should there be a need to hold hard copies of any records, these will be retained in a locked cabinet in the CEO's office and only accessed by members of the Senior Management Team.

How long will we keep your information

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.

Your rights

Under data protection law, you have certain data subjects' rights including:

- 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

Queries and Concerns

If you have any queries or concerns about our use of your personal information, you can raise these with us by contacting:

Claire Ironside
Chief Executive
Manor Estates Housing Association
Email: cironside@manorestates.org.uk
Tel: 0131 510 8540

OR by contacting our Data Protection Officer, who is provided by RGDP LLP and can be contacted by email at info@rgdp.co.uk**.**

You can also complain to the ICO if you are unhappy with how we have used your data. Their details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline Number: 0303 123 1113

ICO Website: Make a complaint | ICO

The accuracy of your information is important to us; please help us keep our records updated by informing us of any changes to your personal and contact details.

Date of approval: 16.11.26