



PRIVACY NOTICE FOR EMPLOYEES, BOARD AND COMMITTEE MEMBERS, VOLUNTEERS, PLACEMENTS AND APPLICANTS TO THESE POSITIONS.

Statement of Purpose

Westfield Housing Association Ltd. is committed to protecting and respecting your privacy. This privacy notice sets out how we collect, use and protect your personal information.

When you provide or we collect information by which you can be identified then it will only be used in accordance with this privacy notice, the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA) and any subsequent relevant legislation.

We may change this privacy notice from time to time to ensure that it is up to date and in line with current legislation and will advise you when we do so if applicable. We deem that you accept changes to this privacy notice unless you tell us otherwise. The current privacy notice review was completed in October 2025.

Please read it and, if you have any questions, contact us using the details at the end of the notice.

Introduction

Westfield Housing collects and processes personal information, or personal data, relating to our employees, board and committee members, volunteers, placements and applicants to these positions in order to manage the working relationship with you. Keeping your information safe and secure is of vital importance to us, as well as to you.

We want to assure you that we handle information about you in a way you would expect, and in accordance with the law.

We only collect the information we need and will only use it for the purposes we say we will use it for. We will not share it with anyone other than who we tell you or we are legally obliged to share it with.

In this Privacy Notice you will find information about what information we collect from you, why we collect it and what we do with it. We also let you know what to do if you are concerned about what we are doing with information about you.

Who is responsible for your information?

Westfield Housing Limited is known as the “controller” of your personal information for the purposes of the UK GDPR. We are responsible for the security of your information and ensuring we only use it for lawful purposes.

How do we ensure we look after your data?

Under Article 5 of the UK GDPR, there are seven data protection principles with which Westfield Housing must comply.

Article 5.1 requires that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals (‘lawfulness, fairness and transparency’).
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (‘purpose limitation’).
3. Adequate, relevant and limited to what is necessary in relation to those purposes (‘data minimisation’).
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’).
5. Kept in a form which permits your identification of data subjects for no longer than is necessary for the purposes for which personal data are processed’ personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to the implementation of the appropriate technical organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals (‘storage limitation’).
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

Article 5.2 adds that:

7. “the controller shall be responsible for, and be able to demonstrate compliance with, Article 5.1 (‘accountability’).

What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn’t include anonymised data, i.e. where all identifying particulars have been removed. There are also “special categories” of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

Westfield Housing collects, uses and processes a range of personal information about you. This includes (as applicable):

- your contact details, including your name, address, telephone number and personal e-mail address
- your emergency contact details/next of kin
- your date of birth
- your gender
- your marital status and dependants
- the start and end dates of your employment or engagement
- recruitment records, including personal information included in a CV, any application form, cover letter, interview notes, references, copies of proof of right to work in the UK documentation, copies of qualification certificates, copy of driving licence and other background check documentation
- the terms and conditions of your employment or engagement (including your job title and working hours), as set out in a job offer letter, employment contract, written statement of employment particulars, casual worker agreement, consultancy agreement, pay review and bonus letters, statements of changes to employment or engagement terms and related correspondence
- details of your skills, qualifications, experience and work history, both with previous employers and with Westfield Housing
- your professional memberships
- your salary, entitlement to benefits and pension information
- your National Insurance number
- your bank account details, payroll records, tax code and tax status information
- any disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warning letters, performance improvement plans and related correspondence
- appraisals, including appraisal forms, performance reviews and ratings, targets and objectives set
- training records
- annual leave and other leave records, including details of the types of and reasons for leave being taken and related correspondence
- any termination of employment or engagement documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and related correspondence
- information about your use of our IT systems, including telephones, e-mail and the internet
- photographs.

Westfield Housing may also collect, use and process the following special categories of your personal information (as applicable):

- information about your health, including any medical condition, whether you have a disability in respect of which Westfield Housing needs to make reasonable adjustments, sickness absence records (including details of the reasons for sickness absence being taken), medical reports and related correspondence.
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation.

- trade union membership.
- information about criminal convictions and offences.

How do we collect your personal information?

Westfield Housing collects personal information about employees and volunteers in a variety of ways. It is collected during the recruitment process, either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from former employers, information from background check providers, and criminal record checks from the Disclosure and Barring Service (DBS).

We will also collect additional personal information throughout the period of your working relationship with us. This may be collected in the course of your work-related activities. Whilst some of the personal information you provide to us is mandatory and/or is a statutory or contractual requirement, some of it you may be asked to provide to us on a voluntary basis. We will inform you whether you are required to provide certain personal information to us or if you have a choice in this.

Why and how do we use your personal information?

We must have a lawful basis for processing all personal data that we hold about you. We will use your ordinary personal information in one or more of the following circumstances:

- where we ask for your consent
- where we need to do so to perform the employment contract or casual worker agreement, we have entered into with you
- where we need to comply with a legal obligation
- where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests.
- where we need to protect your vital interests.

Our legitimate interests are:

- ensuring the smooth running of the business, business planning, holiday planning.

The purposes for which we are processing, or will process, your personal information are to:

- enable us to maintain accurate and up-to-date employee, board/committee member, volunteer and placement records, and contact details
- run recruitment processes and assess your suitability for employment, promotion or engagement
- checking your ID and right to work in the UK, to join WHA's board/committees, be a volunteer or placement
- make reasonable adjustments for disabled employees and workers, board/committee members, volunteers and placements
- maintain an accurate record of your employment or engagement terms
- administer the contract we have entered into with you
- make decisions about pay reviews and bonuses

- ensure employees are paid correctly and receive the correct benefits and pension entitlements, ensure board/committee members, volunteers, placements are paid any expense claims correctly
- deduct income tax and National Insurance contributions where applicable
- record and assess your education, training and development activities and needs
- plan for career development and succession
- manage, plan and organise work
- enable effective workforce management
- recording sickness absences
- record maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work
- payment of SSP or contractual sick pay
- payment of other statutory or contractual pay entitlements, e.g. SMP, SPP, SAP and ShPP
- keep employees, board/committee members, volunteers and placements safe
- make decisions about continued employment or engagement
- provide references on request for current or former employees, board/committee members, volunteers and placements
- monitor your use of our IT systems
- ensure equal opportunities

What if you fail to provide personal information?

If you fail to provide certain personal information when requested or required, we may not be able to perform the contract or agreement we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.

Why and how do we use your sensitive personal information?

We will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences, when we need to.

Some special categories of personal information, i.e. information about your health or medical conditions and trade union membership, and information about criminal convictions and offences, is processed so that we can perform or exercise our obligations or rights under employment law or social security law and in line with our data protection policy. Information about health or medical conditions may also be processed for the purposes of assessing the working capacity of an employee,

We may also process these special categories of personal information, where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time and if there are likely to be any material effects upon your employment or volunteering because you have withdrawn consent, we will inform you at the time.

Where Westfield Housing processes certain special categories of personal information, i.e. information about your racial or ethnic origin, religious or philosophical beliefs and sexual

orientation, this is done only for the purpose of equal opportunities monitoring and in line with our data protection policy. Personal information that Westfield Housing uses for these purposes is collected with your explicit written consent, which can be withdrawn at any time, and may then be anonymised. It is entirely your choice whether to provide such personal information.

For processing personal data relating to criminal convictions:

The regulations relating to the processing of personal data about criminal convictions now lie within the Data Protection Act 2018: Law Enforcement Directive. Our lawful basis for processing this personal data is:

- the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection, **and** the data subject has given consent to the processing.

Change of purpose

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose. We will explain the lawful basis that we will use to legitimise the processing of your personal information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

Who has access to your personal information?

Your personal information may be shared internally within Westfield Housing, including with members of the HR department, payroll staff, your line manager, other managers in the department in which you work and IT staff if access to your personal information is necessary for the performance of their roles.

Westfield Housing may also share your personal information with third-party service providers (and their designated agents). We will only do this where it is necessary for them in the delivery of services that they provide to Westfield Housing. Third-party service providers are:

Name of company/organisation	The service they perform for us, or their function
Not applicable	Recruitment
Dodd & Co	HR function - Payroll
Social Housing Pension Scheme, part of The Pensions Trust	Pension provider
Choose Occupational Health (from 2027 – UKIM following merger with UK Independent Medical)	Occupational health provider
System IT	IT provider/IT maintenance

Housing Online	Website maintenance
Crowe LLP & Dodd & Co	Accountants
National Westminster Bank	Banking
Daisy Telecommunications	Telephone (land line)
Daisy Telecommunications	Mobile phones
Fastness	Confidential waste disposal
Facebook and LinkedIn	Social media
Atlas – The Citation Hub	Training - E-Learning
Black Hawk Discounts (BHN)	Employee discount scheme
Azeus Convene	Board/Committee Meetings software

Please be aware that these organisations are data controllers in their own right and we encourage you to read their privacy notices

We will never sell or distribute your personal information to any other third parties or make it public unless we have a legal obligation to do so

Westfield Housing may also share your personal information with other third parties in the context of a potential sale or restructuring of some or all of its business. In those circumstances, your personal information will be subject to confidentiality undertakings.

How does Westfield Housing protect your personal information?

Westfield Housing has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. To obtain further information about these measures contact dataprotection@westfieldha.org.uk.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

Westfield Housing also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where appropriate.

For how long does Westfield Housing keep your personal information?

Westfield Housing will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

Westfield Housing will generally hold your personal information for the duration of your employment or engagement. The exceptions are:

- any personal information supplied as part of the recruitment process will not be retained if it has no bearing on the ongoing working relationship
- personal information about criminal convictions and offences collected in the course of the recruitment process will be deleted once it has been verified through a DBS criminal record check, unless, in exceptional circumstances, the information has been assessed by Westfield Housing as relevant to the ongoing working relationship
- if it has been assessed as relevant to the ongoing working relationship, a DBS criminal record check will nevertheless be deleted after six months or once the conviction is “spent” if earlier (unless information about spent convictions may be retained because the role is an excluded occupation or profession)
- disciplinary, grievance and capability records will only be retained until the expiry of any warning given (but a summary disciplinary, grievance or performance management record will still be maintained for the duration of your employment).

Once you have left employment or your engagement has been terminated, we will generally hold your personal information for one year after the termination of your employment or engagement, but this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to six years to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court.

We will hold payroll, wage and tax records (including salary, bonuses, overtime, expenses, benefits and pension information, National Insurance number, PAYE records, tax code and tax status information) for six years after the termination of your employment or engagement. Overall, this means that we will “thin” the file of personal information that we hold on you one year after the termination of your employment or engagement, so that we only continue to retain for a longer period what is strictly necessary.

Personal information that is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it no longer permits your identification.

WHA follows the National Housing Federation’s Data Retention Schedule 2018. A copy can be made available upon request.

How and where we keep your data

We store your data in documents kept at our Minto Centre offices and secure storage locations in Cumbria. We also store your data electronically on our servers.

Some of your personal data may be transferred outside the EEA.

We make sure that it is protected in the same way as if it was being used in the EEA. To do this we will:

- Only transfer it to a non-EEA country with privacy laws that give the same protection as the EEA as specified by the European Commission and which has been determined as adequate by the EEA or the UK;
- When transferring to the USA or any other country that has not been assessed as adequate we will ensure that there is a safeguard in place that is recognised by the representative supervisory authority of the United Kingdom. This is the Information Commissioner's Office (ICO). The safeguard is to use one of the ICO's standard contractual clauses.

CCTV is in place at our main office and some housing schemes. We record and retain information and CCTV images to safeguard your health and security. CCTV records are retained for the period of any investigation arising from the CCTV images, or no longer than one month.

How we ensure your data is secure

Paper files and records containing personal information are kept secure. Staff are provided with guidance on secure handling of records when taken from the office, for example, when carrying out a home visit.

We ensure any information on our computer system is secure, accurate, relevant and necessary. All our computers are secured with passwords, and staff are all fully trained on our systems. The personal data held on mobile IT devices is minimised, encrypted wherever possible and technical measures taken to secure data should a device be lost or stolen.

Changes to this privacy notice

Westfield Housing reserves the right to update or amend this privacy notice at any time, including where Westfield Housing intends to process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

Your rights under the UK GDPR

You have a number of rights under the UK GDPR:

Access to your personal information

Under the UK GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR). SARs may be made in writing or verbally and we may ask that your request is accompanied by proof of your identity as a security measure. We have one calendar month within which to provide you with the information you've asked for (although we will try to provide this to you as promptly as possible). Following your SAR, we will provide you with a copy of the information we hold that relates to you.

Correcting mistakes

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting us using the contact details below.

Erasure ('the right to be forgotten')

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

- you withdraw your consent to us holding the information (and where "consent" is the legal reason why we hold it)
- the information is no longer necessary in relation to the purpose for which we originally collected it
- where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- where we unlawfully processed the information
- the personal information has to be erased in order to comply with a legal obligation

We will usually be able to agree to your request to delete the information we hold about you. However, there are some legal reasons why we may not be able to agree. We can refuse to erase your personal information where the personal information is processed for the following reasons:

- 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; or
- where we have an overriding legitimate interest for continuing with the processing

Objection to processing

You have the right to object to processing where we say it is in our legitimate business interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

The right to restrict processing

You can ask us to limit the way we use your personal data if you are concerned about the accuracy of the data or how it is being used. We may not agree to do this if it is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or the data subject in the field of employment, or otherwise materially affects our contract with you.

The right to data portability

This applies to information you have given us. You have the right to ask that we transfer the information you gave us to another organisation.

Rights in relation to automated decision making and profiling

You have the right to ask that any decisions we make about you by automated means be reviewed by a human being with the authority to override this decision if necessary and to ask us to stop using your personal data to create a profile of you for whatever means.

We currently do not use automated means to make decisions or make use of your personal data to create a profile of you.

Withdrawal of consent

Where we have asked for your consent to hold and process information about you, you have the right to withdraw your consent at any time.

If you want to exercise any of your rights, please use the contact details provided below.

Contact

If you have any questions about this privacy notice or how we handle your personal information, please contact dataprotection@westfieldha.org.uk

The Information Commissioner (ICO)

The ICO is also a source of further information about your data protection rights. The ICO is an independent official body, and one of their primary functions is to ensure we comply with the UK GDPR.

If you are unhappy about the way your personal data is handled please let us know by contacting dataprotection@westfieldha.org.uk

We will explain how we have processed your personal information and if we have made a mistake will tell you how we will put this right.

If you are still dissatisfied, you may report your concern to the Information Commissioner's Office (ICO) by contacting:

Wycliffe House, Water Lane, Wilmslow SK9 5AF, Tel. 0303 123 1113 <https://ico.org.uk/>