



General  
Data  
Protection  
Regulation

# FAIR PROCESSING NOTICE

## JOB APPLICANTS

This notice explains what information 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 handle your information.

**Southside**  
HOUSING ASSOCIATION

 0141 422 1112

 [www.southside-ha.org](http://www.southside-ha.org)

## WHO ARE WE?

Southside Housing Association (Reg. No. HCB186) is a Scottish Charity (Scottish Charity Number SCO36009), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 1694r(s) and having its Registered Office at 135 Fifty Pitches Road, Glasgow G51 4EB takes the issue of security and data protection very seriously and strictly adheres to guidelines published in the [Data Protection Act of 1998] and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z6936072 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Desmond Phee (Corporate Compliance Officer).

Any questions relating to this notice and our privacy practices should be sent to the Data Protection Officer.

## HOW WE USE YOUR INFORMATION

The information we collect from you will in the main be basic personal and contact details which we require to carry out our functions as a Registered Social Landlord. There are occasions however where we are required to collect data of a more sensitive nature which we will always treat with the utmost confidentiality.

We may collect the following personal information about you:

- Your personal details: name, address, date of birth.
- Your contact details: home telephone number, mobile phone number and email address;
- Other details: including information about your gender, ethnicity, disability, medical details and your signature.
- Your employment history and education history.
- Employment application details such as your Asylum status, your right to work in the United Kingdom and criminal record declaration.

We will also collect additional information when we make an applicant an offer of employment. This could include requesting and holding a copy of your passport, national insurance number and in some circumstances a valid driving licence and insurance and MOT documents.

We may also record factual information whenever you contact us or use our services, as well as what action we have taken so that we have a record of what happened

We will not collect any personal data for you that we do not need.

We also may receive the following information from third parties:

Employment references that you have provided us with.

## WHY WE NEED THIS INFORMATION ABOUT YOU AND HOW IT WILL BE USED

We need your information and will use your information to:

- Meet our legal obligations including information we have to provide to regulators and statutory authorities
- Process your application for employment.
- Produce and monitor recruitment and selection statistics.
- Respond effectively to our customers enquiries.
- We also need and use your information for all other purposes consistent with the proper performance of our operations and business.

The legal bases for processing your data are:

- To meet our legitimate interests in processing your application for employment
- To fulfil our legal obligations e.g. in ensuring an applicant is eligible to work in the UK
- To enter into a contract with you if your application is successful
- Your consent in processing special category data

## 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 occasionally need to share personal information with other organisations, however where this is necessary, we are required to comply with all aspects of GDPR. Even when this is required, we only share data within the European Union.

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. We are also required to share information with statutory bodies which govern finances or housing for auditing or inspection purposes. However this will be restricted to the actual information required from the Association and will usually be viewed within the Association, with strict permission set on our electronic file system to ensure use is controlled. We will also encrypt and limit the content of any files that require to be sent either electronically or otherwise.

## CONTRACTORS AND SUPPLIERS

We may also share your personal information with our suppliers or contractors who provide a service to you, or who provide services on our behalf. The data that we share will only be the specific information that the supplier or contractor requires in order to deliver that service, as well as any information that ensure we fulfil our health and safety obligations to the people carrying out the task. We may share this information with the following type of organisations.

- Printing and mail distribution
- Document storage

## SPECIAL CATEGORY DATA

There are certain occasions where it would be necessary to share information containing special categories of data. This is only where it is necessary to allow us to perform our functions as a registered social landlord. We currently only ever share the following types of more sensitive information:

- Race, disability or ethnicity details: We share this data with statutory bodies and report on these as a statistical breakdown of job applicants/employees only, this does not include any actual personal data.

## THIRD PARTY ACCESS

Any third party who the Association gives access to our files becomes a Data Processor because they are processing data on behalf of the Association. Although the Data Controller and the Data Processor are two separate entities, we are required to ensure all third party access is given in compliance with GDPR principles, and to that effect have a third party access agreement in place.

The following organisations may be given controlled access to our electronic network for reason of security, maintenance, or any specific purposes outlined in their third party agreement:

- IT maintenance/support contractors.
- Specialist housing software providers.
- User and file system auditing software provider.

## THIRD PARTY REPRESENTATION

If you wish for another person to deal with your affairs or act on your behalf you can access a Personal Representative Mandate Form on our website or on request from our offices. When you complete this form it allows you to nominate a named person and give them permission to discuss specific personal information with us or to act on your behalf in relation to all of your personal information in dealing with us.

We will not share your personal information with anyone unless we are assured that you have given them permission to act on your behalf or that they act in a recognised official capacity. This may mean that there may be a delay in us dealing with your request while we confirm a person's identity or confirm that we have your permission to deal with them.

## SECURITY

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

Only SHA staff and partners and contractors who have signed data sharing agreements and who need to see your personal information will have access to it.

Our computer systems are located in our main office, however our staff may occasionally use laptops, tablet or other devices offsite. In instances where devices are used remotely this will be secure and under strict control at all times in line with section 6 of SHA's IT Policy which is available on request. Additionally we have the following controls in place to ensure the security of your personal information

- All paper based records are securely locked in storage cupboards when not actively being used.
- Our offices are protected by an alarm system, a security company and are monitored by CCTV.
- All SHA computer servers are within a secure network.
- All electronic communication takes place within this secure environment.

The unauthorised use of IT systems is prevented by:

- User ID
- Password assignment
- Lock screen with password activation
- Each authorised user has a private password known only to themselves.
- Regular prompts for password amendments

The following additional measures are taken to ensure the security of any Data:

- Network username
- Network password
- Application username
- Application password
- Application permissions and access restricted to those who require it.

## HOW LONG WE WILL 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 (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We will generally keep your information for the periods set out in our Data Retention Periods Guidelines, after which this will be destroyed if it is no longer required for the reasons it was obtained. In terms of applications for employment with the Association:

- Non-shortlisted applications: We will retain for no longer than one year to reflect statutory time limitations in relation to appeals or claims.
- Successful applications: Transferred to personal files for duration of employment and retained thereafter for no longer than six years.
- Our full retention schedule is available on request or can be viewed on our website.

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of your we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at [enquiries@southside-ha.co.uk](mailto:enquiries@southside-ha.co.uk)

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL  
Telephone: 0131 244 9001  
Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

# Southside

## HOUSING ASSOCIATION

