ORWELL HOUSING ASSOCIATION LIMITED
PRIVACY NOTICE FOR EMPLOYEES

How we use your personal information

Identity and contact details of Controller

Orwell Housing Association Limited (Orwell') is a controller of personal data for the purpose of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 (DUAA), and other applicable data protection and privacy legislation.

Orwell is responsible for ensuring that personal information is processed lawfully, fairly, and transparently, in accordance with applicable data protection legislation.

Where Orwell determines the purpose and means of processing personal information, it acts as a controller. Where Orwell processes personal information on behalf of another organisation, its role and responsibilities will be determined by the relevant arrangement and applicable legislation.

Purpose of this Privacy Notice

This Privacy Notice tells you what to expect when Orwell processes personal information. It applies to information about applicants, employees, former employees, board members, work experience placements and volunteers. It explains the purposes for which we may process your personal information and the legal basis for the processing (processing' includes us just keeping your personal information).

Why do we collect and store personal information?

Orwell needs to collect, process and store personal information about you and any next of kin contacts provided by you for the purpose of entering and administering an employment contract with you.

Where you provide information about another individual, you should, where appropriate and reasonably practicable, inform them that their personal information has been provided to Orwell and direct them to this Privacy Notice.

Orwell will also process personal information to ensure that we 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 contract and to administer benefits, pensions and entitlements.

A non-exhaustive list of examples explaining why we collect and store your personal information can be found below.

Need	Examples
Recruitment	• to assess your suitability to work for Orwell • to conduct assessments and interviews • to make offers and provide contracts of employment • to carry out pre-employment checks, including right to work in the UK and criminal records checks
Training	• to ensure you have received mandatory training to complete your role safely and effectively
Employment	• to pay you • to contact you • to administer benefits and entitlements • to legally drive an Orwell vehicle
Health and Safety	• to ensure your health and safety at work • to make reasonable adjustments for workers with a disability • to conduct risk assessments • to process insurance claims
Business planning	• to collate and manage workforce data • to enable financial modelling and planning

In some cases, Orwell needs to process data to ensure that we are compliant with our legal obligations. For example, we are required to check an employee's entitlement to work, to deduct tax, to comply with health and safety legislation, to evidence mandatory vaccinations and to enable employees to take periods of leave to which they are entitled.

Legal basis for processing

We often have more than one legal basis for processing personal data. Firstly, where it is necessary for the purposes of the legitimate interests pursued by Orwell or by a third party to process your information. We can do that so long as we do not interfere with your fundamental rights or freedoms.

Secondly, where we are under a legal obligation or an obligation under a contract of employment to process the information.

Thirdly, because we have your consent (i.e. agreement) to us processing your personal information. Under the UK GDPR, consent is a legal basis for processing personal information. You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights under UK GDPR'.

The other reasons we can rely upon to process your personal information under UK GDPR is as follows:

- 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, 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 the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental), to allow effective workforce management, to ensure that Orwell 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;
- provide references on request for current or former employees;
- respond to and defend against legal claims;
- secure access to and from the premises;
- secure use of Orwell's equipment;
- secure Orwell's customers and employees' personal data and Intellectual Property; and
- to provide support if required.

Some special categories of personal data, such as information about health or medical information, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

Where Orwell processes other special categories of data, such as information about ethnic origin and gender, this is done for the purposes of equal opportunities monitoring or to carry out its obligations and exercise specific rights in relation to employment.

To process personal data about criminal convictions or offences, we must have both a lawful basis for the processing and either legal authority or official authority for the processing.

Information we may hold about you and how we use it

We will collect information throughout your employment by various methods, and normally directly from yourself.

We will also obtain information from your referees at the recruitment stage, and if your role requires it, information from DBS, the Disclosure and Barring Service.

During your employment we may obtain information from external parties. These may include;

- feedback from tenants, service users, customers, visitors and training providers
- medical information from your GP, consultant or occupational health
- statutory information from HM Revenue and Customs (HMRC), The Department for Work and Pensions (DWP), Courts and local Councils

The information we hold on our records relates to the employment contract that we have for you. For example:

Type of information	Examples these examples are illustrative and non-exhaustive
about you:	name, address, date of birth, disability and medical information The following are collected on a voluntary basis and used for statistical reporting: gender, nationality, ethnic origin, sexual orientation, religion or faith.
to contact you:	address, email address and/or telephone numbers.
to identify you:	photograph, passport, driving licence, employee ID number, payroll number and electronic signatures.
who to contact in an emergency:	name, address, telephone numbers and relationship to you.
to record your skills and experience:	application form, CV, interview question/assessment responses, employment references, employment history, training and qualifications, membership of professional bodies and criminal convictions.
to administer your employment with Orwell:	letters of offer and acceptance of employment, contract of employment, induction, probation, entitlement to work details (visa's / work permits) and variations to contract of employment.
to pay you:	bank account details, National Insurance number, tax code, pension, Orwell loan agreement, student loan or attachment of earnings.
to administer benefits, entitlements and provide references:	length of service, job title, salary, entitlement to benefits, attendance, work patterns and records of authorised and not authorised leave taken, including sickness
to administer access:	computer or software username and ID card. Access and movements in and out of Orwell premises or between locations, including door entry, CCTV recording and other tracking devices (such as vehicle trackers and lone working devices) as appropriate.
to record your performance at work:	records of annual review, support and supervision, targets or objectives, file notes, personal improvement or development plans, correspondence and reports. Recordings of calls to and from our main office telephone number and other designated telephone numbers, call monitoring is processed using Artificial Intelligence which analyses and transcribes calls to monitor and improve services to customers.
to manage discipline, grievance or other employment related processes:	interview and meeting notes or recordings and correspondence including any warnings issued.

We will only ask for personal information that is appropriate to enable us to deliver our employment contract with you. In some cases, you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

How we manage your personal information

We process your personal information in accordance with the principles of UK GDPR. We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes;
- Kept up-to-date, accurate, relevant and not excessive;
- Not kept longer than is necessary;

- Kept secure.

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate.

To help us to ensure confidentiality of your personal information we may ask you security questions to confirm your identity when you call us. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

Periods for which we will store your personal information

In accordance with Orwell's data retention policy, we will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

Sharing your personal information

Your information may be shared internally, including with members of the HR team, the Finance team (for payroll purposes), your line manager, managers in the business area in which you work, the Directors of the business and IT employees, and potentially with other Orwell locations if access to the data is necessary for performance of their roles.

Where necessary or required, we may share information as follows:

- to comply with the law (e.g. the Police, HM Revenue and Customs (HMRC), Council Tax Registration Officer, Social Security Fraud Act) or a court order
- where there is a clear health or safety risk to an individual or members of the public, evidence of fraud against Orwell, other irregular behaviour or a matter Orwell is investigating
- where Orwell has entered into a formal protocol with the Police, a local authority department or the Care Quality Commission
- providing information anonymously for bona fide statistical or research purposes, provided it is not possible to identify the individuals to whom the information relates
- information required by the Regulator of Social Housing when monitoring Orwell's activities in its capacity as the regulator of housing associations.
- with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary Disclosure and Barring Service (DBS) information from the relevant service providers.
- with service providers who assist with psychometric testing as part of the recruitment and development process, your consent will be obtained for these purposes.
- With a third-party training provider if you are attending a course provided by a third party.
- with third parties in the context of a sale or transfer of some or all of its business. In those circumstances, the data will be subject to confidentiality arrangements.

- with third parties that process data on its behalf, in connection with payroll, employee benefits and the provision of occupational health services.
- to protect the vital interests of an individual (in a life-or-death situation)

Your rights under the UK GDPR

You have a number of rights under the UK GDPR:

Access to 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 need to follow Orwell's SAR procedure.

Rectification

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting our People team on 0345 60 100 30.

Erasure (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
- where you withdraw consent
- 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 must 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:

- 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.

Restriction on processing

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have a legitimate interest in using the information
- If the processing is a breach of the UK GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction, giving the reasons why.

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 overrides your interests and rights, or the processing is necessary for us or someone else to bring or defend legal claims.

Withdrawal of consent

You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent, then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.

Right to data portability

The right to data portability allows us to obtain and reuse your personal data across different services. It allows us to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

Data Protection Complaints

If you have concerns about how we collect, use, store or otherwise process your personal data, you can raise a data protection complaint with us.

You can submit your complaint by contacting dpo@orwell-housing.co.uk

We will acknowledge receipt of your complaint within 30 days, take appropriate steps to investigate and respond without undue delay.

If you remain dissatisfied, you have the right to complain to the information Commissioner's Office (ICO), the UK's independent data protection regulator.

You can contact the ICO at www.ico.org.uk/make-a-complaint or by telephone on 0303 123 1113.

Changes to this Privacy Notice

We keep our privacy notice under regular review and will place any updates on our website, centralised internal location such as an intranet and our HR software solution; you will be notified of any major changes to this policy.

Further information

For further information on how to request your personal information and how and why we process your information, you can contact us using the details below.

Data Protection Officer
Orwell Housing Association
Crane Hill Lodge
325 London Road
Ipswich
IP2 0BE
0345 60 100 30
DPO@orwell-housing.co.uk

The Information Commissioner (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 administer the provisions of the UK GDPR.

You have the right to complain to the ICO if you think we have breached the UK GDPR. You can contact the ICO at:

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

0303 123 1113 / http://www.ico.org.uk/

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