Employee Privacy Notice

As an employer we must meet contractual, statutory, and administrative obligations. We are committed to ensuring that the personal data of employees is handled in accordance with the principles set out in UK General Data Protection Regulation (GDPR). This privacy notice tells you what to expect when we collect personal information about you. It applies to all applicants, current employees, ex-employees, agency staff, contractors, and non-executive directors. However, the information we process will vary depending on your specific role and personal circumstances.

It is important that you read this notice, together with any other privacy notice as it tells you about the sort of personal information we collect and how and why we will use it.

We reserve the right to modify or amend this Privacy statement at any time and for any reason, providing it maintains compliance with the General Data Protection Regulation.
This privacy notice was last updated in **November 2025**

Aspire Housing Employees

Aspire Housing is acting as data controller and is registered with the Information Commissioner Office (registration number Z7678641). Parts of this notice refer to our other corporate policies and procedures.

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How Do We Get Your Information?

We may get information about you from the following sources:

- Directly from you.
- Other employees, including your manager.
- An employment agency.
- Referees, either external or internal.
- Security clearance providers.

- Occupational Health and other health providers.
- Pension administrators and other government departments, for example the HMRC.
- Your Trade Union.
- Providers of staff benefits.
- Images from our CCTV systems.

What Personal Data We Process and Why

We process the following categories of personal data:

Information Related to Your Employment

We use the following information to carry out the **contract** we have with you:

- Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses.
- Your date of birth and gender
- A copy of your Passport, national Insurance number details, and other evidence of identity.
- Information about your marital status, next of kin, dependants, and emergency contacts.
- Bank account details, payroll records, and tax status information.
- Salary, annual leave, pension, and benefits information.
- Location of employment or workplace.

The processing of this information allows us to provide you access to business services required for your role and manage our People Services processes.

Information Related to Employment, Pay, Benefits, and Leave

We have a **legal obligation** to process the following information for the administration of statutory and contractual leave entitlements such as holiday or maternity leave. We also process information for the payment of your salary, pension, and other employment related benefits.

- Information about your job role and your employment contract including your start and finish dates, salary (including grade and salary band), any changes to your employment contract, working pattern (including any requests for flexible working).

- Details of your time spent working, including overtime, expenses or other payments claimed, including details of any loans such as for travel season tickets.

- Details of any leave including sick leave, holidays, special leave etc.

- Pension details including membership of both state and occupational pension schemes (both current and previous).
- Your bank account details, payroll records and tax status information.

- Trade Union membership for the purpose of the deduction of subscriptions directly from salary.
- Details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay. This includes forms applying for the relevant leave, copies of MATB1 forms/matching certificates and any other relevant documentation relating to the nature of the leave you will be taking.

Information Relating to Your Performance and Training

We have a **legitimate interest** to process the following information to assess your performance, to conduct pay and grading reviews and to deal with any employer / employee related disputes. We also use it to meet the training and development needs required for your role.

- Information relating to your performance at work e.g., probation reviews, promotions.
- Grievance and dignity at work matters and investigations to which you may be a party or witness.
- Disciplinary records and documentation related to any investigations, hearings and warnings/penalties issued.
- Whistleblowing concerns raised by you, or to which you may be a party or witness.
- Information related to your training history and development needs.

Information Relating to Monitoring

We have **legitimate interests** to use the following information to assess your compliance with our corporate policies and procedures and to ensure the security of our premises, IT systems, and employees.

- Information derived from monitoring IT acceptable use standards.
- CCTV images
- Lone workers are monitored for safety reasons using an 'App' on their mobile phone.
- Aspire Vans and Minibuses are tracked using GPS and driving style data such as speed is reported.

Information Relating to Your Health & Wellbeing, and Other Special Category Data

We use the following information to comply with our **legal obligations** and for equal opportunities monitoring. We also use it to ensure the health, safety, and wellbeing of our employees.

- Health and wellbeing information either declared by you, or obtained from health checks, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires, or fit notes i.e., Statement of Fitness for Work from your GP or hospital.
- Accident records if you have an accident at work.
- Details of any desk audits, access needs, or reasonable adjustments.

- Information you have provided regarding Protected Characteristics as defined by the Equality Act for the purpose of equal opportunities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.

Lawful Basis for Processing Your Personal Data

Depending on the processing activity, we may rely on the following lawful basis for processing your personal data under the UK GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest.

Special Category Data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights. We have an Appropriate Policy Document as required by The Data Protection Act 2018, Schedule 1, for this processing.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise, or defence of legal claims.

Please see the Special Category and Criminal Data Processing Policy for more information.

Criminal Convictions and Offences

We process information about colleague criminal convictions and offences. The lawful basis we rely on to process this data are:

- Article 6(1)(b) for the performance of a contract.
- Article 9(2)(b), exercising our rights as an employer.

Use of Artificial Intelligence (AI)

We may use AI technologies to support HR processes such as recruitment, performance analysis, and training recommendations. All AI usage is subject to human oversight and complies with data protection principles.

Surveys

We conduct staff surveys to gather feedback and improve our services. While most survey responses are anonymised and participation is voluntary, certain surveys, such as starter or

leaver surveys may request your name or other identifying information. Where this is the case, colleagues have the option for their response to be anonymised if they prefer.

How Long We Keep Your Personal Data

We will only keep your personal data for as long as is necessary and will securely dispose of it after that time. For employees, we hold your personal data throughout the period of your employment, and for a duration thereafter. For more information about how long we hold your personal data, see our retention schedule.

Data Sharing

We will share information about you with third parties including government agencies, pension providers, and external auditors. For example, we may share information about you with HMRC for the purpose of collecting tax and national insurance contributions. In some circumstances, such as under a court order, we are legally obliged to share information. We will only ever share the minimum required and in a secure manner.

Do We Use Any Data Processors

Where we use data processors, we have a written agreement with them that ensures your data is protected and secure.

We use several data processors to:

- Store employment and payroll data.
- Track vehicles
- Operate CCTV

Transfers of Personal Data

We do not routinely transfer staff personal data overseas but when this is necessary, we ensure that we have appropriate safeguards in place.

Your Duty to Inform Us of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us, by checking your information on Cascade and updating in a timely manner.

Your Rights in Connection with Your Personal Information

You can access the current data we hold about you within your Cascade account.

As an individual, you have certain rights regarding the processing of your personal information, including a right to log a complaint with the Information Commissioner's Office as the relevant supervisory authority. Your rights are:

- The right to be informed – this right ensures that we keep you informed about the types of processing we do with your personal information, and why. This privacy notice provides that information.
- The right of access - you have the right to ask for a copy of the information we hold about you.
- The right to be forgotten- in certain circumstances you can ask for the information we hold about you to be erased from our records.
- The right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- The right to rectification if information is inaccurate or out of date.
- The right of data portability - you have the right to have the data we hold about you transferred to another organisation.
- The right to object – you have the right to object to certain types of processing such as direct marketing.
- The right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.

Please see the GDPR Enforcing Individual Rights Procedure and the Data Subject Rights Procedure for more information about your individual rights.

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence, birth certificate, or utility bill (within the last three months).

If you would like to exercise any of your rights or request a copy of some or all your personal information, please either complete the Data Subject Access Request Form (available on the Data Protection Helpdesk (Halo) or contact us by using the details provided in 'How to Contact Us' Section. No charge will be made for this service.

Further Information

Car parking spaces

If you are allocated a car parking space, our facilities department also hold vehicle licence plate details linked to you. These details are deleted when staff leave the organisation.

Whistle-blowers

Aspire has a policy and procedure in place to ensure both current staff and ex-employees have an avenue for raising concerns about malpractice.

If you wish to raise a concern, please refer to the whistleblowing policy.

Although every effort will be taken to restrict the processing of your personal data and maintain confidentiality whether this is possible will be dependent on the nature of the concern and any resulting investigation.

Equal Opportunities Monitoring

Equal opportunities information provided by job applicants is attached to the relevant application on our applicant tracking system when you apply for a role at Aspire.

This information is not made available to any staff outside our recruitment team (including hiring managers) in a way which can identify you. This information is anonymised after six months and retained for reporting purposes only.

Staff Development and Planning

Our Learning & Development department use online learning platforms for the facilitation of its work-related courses. We will also share information about you with our training providers. For example, this will include information such as your name, contact details and job role. When necessary, we will also share information about any dietary or access requirements that you might have when you attend training events.

Occupational Health

During your employment, you may be referred to occupational health following a request to HR by you or your line manager. This may result in a face-to-face consultation, a telephone appointment with an occupational healthcare professional and/or a medical report from a GP or specialist.

We use People Asset Management Group Ltd (PAM) to provide our occupational health service and who may be the data controller for your information. The information you provide will be held by PAM, who will give us a fit to work certificate or a report with recommendations. You can read PAM's privacy notice here PAM Group- Privacy Policy.

Trade Union Membership

The Trade Unions are controllers for the personal information connected to your union membership. Aspire holds some union subscription details to process salary deductions for union membership for which you will have given your consent.

Monitoring of Staff

All our IT systems, and the swipe access system for the entry and exit of our premises are auditable and can be monitored. We do not monitor routinely but may do so for performance related concerns.

If you drive, or travel in a company owned Maintenance Team vehicle, its movements will be tracked for insurance and safety purposes. We use a specialist firm to provide this service under a written agreement.

We are committed to respecting individual users' reasonable expectations of privacy concerning the use of our IT systems, equipment & vehicles. However, we reserve the right to log and monitor such use in line with our Information Security & Systems Usage Policy. Any targeted monitoring of staff related to the above will take place within the context of our disciplinary procedures.

If you operate as a lone-worker, you will install the StaySafe App on your phone. This App monitors your location and movements. It allows you to raise an alarm to protect your safety or automatically raises an alarm after prolonged non-movement. We use a specialist firm to provide this service under a written agreement.

Use of Personal Contact Details for Business Continuity and Emergency Situations

In limited circumstances, we may process personal contact details (such as personal mobile numbers or home addresses) to support business continuity planning and to enable timely communication in emergency situations. This processing is conducted either with the individual's consent or where it is necessary for the organisation's legitimate interest, such as ensuring the safety of colleagues and maintaining operational resilience. Personal contact information is only accessed by authorised personnel and is handled securely in accordance with data protection legislation and internal policies.

Security Passes and Fobs

All staff are all issued with a security pass that displays their full name, job title, and photograph. Staff pass details (names, job titles, and photographs) are held on a machine controlled by Facilities and can only be accessed by a restricted number of people. Photographs are uploaded by Facilities colleagues. When you leave your employment with us, your details are deleted as soon as possible from this system.

Where employees are issued with a key fob to gain access to the main entrance of a residential block, the key fob reference will be recorded against your name. The use of key fobs is recorded on a secure, computer-based system to manage the security of the building and the issuing of key fobs.

CCTV

We operate CCTV in the car parks, grounds and inside our premises to monitor access to certain areas of the office. Further information is available in our CCTV policy.

Requests for References

If you leave, or are thinking of leaving, we may receive requests from your new or prospective employer for a reference. These typically involve confirming details such as your employment dates and job title.

Queries and Complaints

If you wish to make a complaint about how your personal data is being processed by Aspire or any of our third parties. Please contact Aspire's Data Protection Team using the details provided in the 'How to Contact Us' Section.

You also have the right to complain to the Information Commissioner's Office (ICO) about how we have processed your personal data. The ICO can be contacted at:
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by
Telephone: 0303 123 1113 or through the website: Make a complaint | ICO

How to Contact Us

Our Registered Office is:
Aspire Housing, Kingsley, The Brampton, Newcastle-under-Lyme, ST5 0QW Telephone: 01782 635200.

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Team at Aspire Housing, Kingsley, The Brampton, Newcastle-under-Lyme, ST5 0QW.
- Telephone: 01782 635200
- Email: DPO@aspirehousing.co.uk

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.