



## **FAIR PROCESSING NOTICE FOR WOMEN'S PIONEER EMPLOYEES**

### **Women's Pioneer Housing Ltd and the GDPR**

Under the EU General Data Protection Regulation (GDPR), Women's Pioneer Housing Ltd (WPH) and complying with the rules and regulations set out in handling your personal data. This Fair Processing Notice outlines our privacy policy and explains to you what data we hold about you, why we hold it, what we do with it, and your rights under the GDPR.

WPH is a housing association registered with the Information Commissioners Office (ICO) as a data controller.

Our ICO Registration number is: Z5679469

WPH can be contacted using the following details:

Women's Pioneer Housing  
227 Wood Lane  
London  
W12 0EX  
United Kingdom

Tel: 020 8749 7112

Email: [info@womenspioneer.co.uk](mailto:info@womenspioneer.co.uk)

### **GDPR Principles**

The GDPR aims to protect the rights and freedoms of individuals in relation to their personal data.

All personal data must be processed according to the following principles:

- Personal data shall be processed lawfully, fairly and in a transparent manner.
- Personal data shall be processed and kept only for relevant purposes and limited to what is necessary.
- Personal data shall be collected only for its purpose and for no other reason.
- Personal data should only be kept and stored for the intended retention period set by law or the company.
- Personal data shall be processed with mindfulness and awareness of its confidentiality and security.
- Personal data must be kept with accuracy. Any incorrect data should be corrected or erased immediately.

## **What is personal data?**

Personal data is any information that relates to an identifiable living person, directly, or indirectly, such as a name, or code.

## **What is data processing?**

Processing of your data relates to all stages from collecting, recording, storing, erasure and destruction.

## **What personal data are WPH processing?**

As an employee at WPH, it is necessary for us to hold personal data about yourself in accordance with your employment contract.

This information includes:

- Personal details (e.g. name, address, contact details, NI number)
- Enrolment notes from interviews
- Financial details
- Contract information such as your role & salary
- Payroll & tax information
- Education & previous employment details
- Visual images
- Sickness & return to work forms
- Declaration of interests
- Insurance documents
- Timesheet data
- Pension scheme information
- Pioneer perk enrolment
- Business Continuity Plan
- Disaster Recovery Plan

In addition to this, we also hold special categories of personal data including, subject to appropriate safeguarding:

- Health details
- Offences & alleged offences
- Criminal proceedings, outcomes and sentences (if applicable)
- Racial or ethnic origin

We will ask for further third party information about your next of kin, in the interests of your health and safety and wellbeing. We ask that you inform your next of kin's before you pass on their information to us. A fair processing notice is also available to them on our website.

We also record and monitor audio calls. All calls made to WPH are recorded, except for when that call is made regarding a payment and is of a financial matter, or is made to a portable mobile device. The reason we record your calls is to document communication with you. This can assist us in the

future with identifying yours and other staffs needs, as well as helping us to improve customer satisfaction in the event of a complaint. Calls are recorded by our IT support & provider (Pentangle) and stored in a secure manner, on the internal Women's Pioneer servers on site. Access is only made available to our Corporate Services team when necessary. Call recordings are kept for 6 months.

We also keep CCTV footage recorded in some communal areas of our listed buildings and carparks, should you attend a site visit. This assists us in monitoring any issues surrounding reports of anti social behaviour, crime, fly tipping or any concerns that arise that might affect your well being and housing experience. If your property keeps CCTV, Women's Pioneer store recordings in a secure manner on our remote server, only accessible by those with authority to do so. We keep CCTV footage permanently in case of legal proceedings. We hold and process CCTV data for the health, safety and benefit of yourself and our other tenants. We may, on a case by case basis, be legally required to share this footage with police or local authorities, following a formal, documented request.

When you visit our website, if you choose to do so, our website hosting provider may collect your IP address which may provide them with information about your location and device you are browsing on. We do not have control over this data and it is not shared with us. You will also be asked if you would like to complete an online survey, hosted by SurveyMonkey. Your responses are anonymised and are unidentifiable to you. We conduct surveys for the purposes of client and resident engagement and improvement.

We also use Google Analytics, a web analytics service provided by Google. Google Analytics uses cookies to analyse how visitors use websites and assess site traffic. Our website does not use cookies to identify you from other users. This information, including your IP address is transmitted and stored by them and we do not process any of this information. If applicable, Google will provide information on how they use your information for their own purposes.

If you visit and post a comment on our social media pages (e.g. twitter), we will not use your data elsewhere unless you give us consent to do so. We use social media platforms to allow you to interact with Women's Pioneer by other means than calls or emails in the interests of you as a visitor.

Staff and Board member data are also documented in the WPH Business Continuity Plan (BCP). A copy of this is kept at each member of the Senior Management Team's homes. The risks of this are balanced against how vital this information will be in an emergency situation, for example if an incident happens in the middle of the night, and it's considered that storing the BCP in this way is necessary for the organisation.

### **Why are WPH processing this information?**

WPH will only hold data where there is a legitimate interest to do so. For all legitimate interests we evaluate that interest compared with your rights and freedoms. When your rights and freedoms override this WPH will not process your data. We also process your data on a contractual basis as a result of your employment contract with us.

We process employee information for the following purposes:

- Recruitment & staffing
- Administration of benefits and compensation
- Legal compliance
- Risk management
- To protect the interests of WPH and the public against issues such as injury, theft, fraud and other legal issues
- Performance management
- Training
- General ad hoc, or in the event of an emergency.

In very extreme cases, where WPH may have to process your data in a life or death situation, your data may be processed under the legal basis of vital interest.

### **How do WPH process and store your information?**

All personal data is collected and initially processed by our staff at WPH. Data is then further processed using a number of electronic systems.

Electronic systems include:

- INVU (document management processor)
- Internal Intranet
- SAGE (payroll provider)
- Microsoft Office (e.g. Outlook)

WPH operates a Thin Client WYSE system, meaning all personal data is saved directly to our main encrypted servers and cannot be saved to individual personal systems. For members of staff that might use Thin Client laptops, work from home, or have access to personal data on work portable devices, every care is taken to ensure that it's contents are password protected, and encrypted. Devices are secured with six digit passcodes, only known by the appropriate senior member of staff and the assigned employee. Emails kept on phones are automatically synced and destroyed after:

- 1 day for staff who are office based
- 3 days for staff who go out infrequently
- 7 days for staff who are not office based and don't have routine computer access

Your rights are considered at all stages and no data will be processed unless absolutely necessary.

Any hard copies containing personal data, deemed unnecessary to be kept in paper format, are destroyed in a secure manner to ensure your confidentiality. Any existing hardcopies are kept within the remits of the WPH office, where particularly sensitive data is kept within locked cabinets. Access is only made available to appropriate members of staff.

### **Who will WPH share this data with?**

Your data will primarily only be shared with staff at WPH, unless we have to pass your work contact details on to a further third party in the interests of the organisation or you, for example when we pass your payroll information onto our payroll provider. On occasion, we may have to share your data with the Office for National Statistics. No personal data will be shared where your rights have not been considered, with the appropriate safeguards in place.

## **Are there any cross border transfers and on what basis?**

WPH does not transfer any personal information outside of the EU/EEA or regulated countries under the GDPR. All our processors and servers are held within the EU/EEA meaning your data is stored with adequate levels of protection. If a case occurs where your personal data needs to be transferred outside of this remit, this would be evaluated in terms of whether this is a legitimate interest of the organisation. If considered necessary, transfer safeguards would be implemented.

## **How long do WPH hold your data for?**

WPH has a retention policy for how long we hold your personal data for, as recommended by National Housing Federation. This is available upon request.

This includes:

- CVs: Duration of employment
- Record of taxable payments: 6 years
- Record of tax deducted or refunded: 6 years
- Record of earnings on which standard NIC payable: 6 years
- Record of NIC (employee and employer): 6 years
- Copy notices to employees: 6 years
- HMRC notice of code changes, pay & tax details: 6 years
- Record of sickness payments: 6 years
- Income tax & NI returns: 6 years
- Redundancy details and record of payments & refunds: 12 years
- Pension valuation & contribution documents: Permanently
- Terms & conditions of service: 6 years after last date of currency
- Remuneration package: 6 years after last date of currency
- Former employees personnel files: 6 years
- References for former employees: 20 years or until retirement age
- Training programmes: 6 years after completion
- Individual training records: 6 years after employment ceases
- Interview notes & shortlists: 1 year
- Timesheets: 2 years after audit
- Medical records: 40 years
- Health & Safety assessments: Permanently
- Accident records/reports: 6 years
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## **What do WPH do with your information once your employment finishes?**

The law requires us to keep certain data included in your employment files for specific periods after you leave WPH. Any paperwork containing your personal data will be kept in a locked safe and destroyed according to our company retention policy.

## **Your rights as a data subject under the GDPR**

The GDPR sets out your following rights:

1. Right to make a subject access request.

You can ask for copy of all your personal data held by WPH. We are legally obliged to adhere to this request within 30 days, free of charge. If the request is particularly large we might request a fee and ask the ICO for more time if needed. If you make a subject access request this must be made in writing. If you are not happy with the information you receive from us then you can contact the ICO at:

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

2. Right to be forgotten.

If you feel WPH is processing data you did not give consent for, you can ask us to delete your personal data in certain circumstances. Women's Pioneer will stop processing, however if we can demonstrate a legal obligation for processing, we can override the withdrawal. Each request will be evaluated on a case by case basis.

3. Right to obtain a restriction of processing.

You can also ask that data processing is restricted, meaning it is merely stored, and not used. This right can be requested when:

- Accuracy is contested
- The processing is unlawful but you would rather the data was stored instead of destroyed
- It is no longer needed for its intended purpose but it is required to be kept for verifications
- You have objected to processing but it is required for proof for erasure of data

4. Right to object to processing.

You can object to WPH processing your data on the basis of your situation. If we can demonstrate legitimate grounds for processing we can override the objection. If your data is being used in the following ways you can object:

- Your data is being used for direct marketing processes
- Your data is being processed for scientific, statistical or historical research purposes, unless this is in the interests of the public.

WPH does not engage in direct marketing, but on the rare occasion that we might use your data, for example, a photograph, we will explicitly gain prior consent.

5. Right to request rectification.

You can ask WPH to correct any inaccurate data. The source of the issue will need to be investigated and will be evaluated on a case by case basis.

6. Right to request data portability.

You can obtain a copy of your personal data from us in a portable format if requested, and have it transferred to another organisation should you wish.

7. Right to request not to be subject to significant decisions when it is based on a decision made solely by automated means.  
This is with regards to when a decision is made your data which is reached without human involvement. WPH does not do this.

If you would like to exercise any of these rights, please contact us so we can investigate and respond to you within 30 days. Should the request be particularly large we may ask the ICO for more time, in which case you will be informed of this and the reasons for it.

### **Details of our designated Data Protection Officer (DPO)**

Name: Mark Cole – Director of Resources

Email: [dpo@womenspioneer.co.uk](mailto:dpo@womenspioneer.co.uk)

### **Changes to this Fair Processing Notice**

Should we make any changes to our Fair Processing Notices in the future we will update the website so that the latest version is available.