

<b>Policy name:</b> Staff Privacy Notice	
<b>Section:</b>	Governance
<b>Exec responsible:</b>	Director of Finance and Resource
<b>Review by:</b>	Governance Manager
<b>Tenant review:</b>	No
<b>Authority to amend:</b>	Chief Executive
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<b>Last review:</b>	November 2025
<b>Next review:</b>	November 2026
<b>Responsibility for delivery:</b>	Governance
<b>Strategy:</b>	
<b>Associated risk ID:</b>	
<b>Health &amp; safety:</b>	
<b>Equality &amp; diversity:</b>	
<b>Associated costs and value for money:</b>	
<b>Associated documents:</b>	

<b>VERSION CONTROL</b>			
<b>Version number:</b>	<b>Sections amended:</b>	<b>Date of update:</b>	<b>Approved by:</b>
<b>1</b>	<b>Review sheet added</b>	<b>11/2025</b>	<b>No amends added</b>
<b>1.1</b>	<b>DPO amended</b>	<b>05/2026</b>	<b>N/a</b>

## Staff Privacy Notice

The following statement explains how Cornerstone Housing use the personal data you share with us.

The sections below explain how we collect your data, what we use it for and how we keep it safe.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

### Who we are:

#### Data Controller:

Cornerstone Housing is the Data Controller whose head office is located at:  
Cornerstone House  
Western Way  
Exeter  
EX1 1AL  
Tel: 01392 273462

#### Data protection officer (DPO):

The data protection officer is Lucy Smith who can be contacted at [governance@cornerstonehousing.net](mailto:governance@cornerstonehousing.net) or on 01392 273462

### What information do we collect?

#### When you apply for a job

- Name and title
- Address
- Telephone number
- Email address
- Employment history
- References
- Qualifications
- Disability information directly relevant to your ability to do the job
- NI number
- Driver licence details
- Passport details or other information provided to show eligibility to work
- Work permit/ visa (if applicable)
- Professional memberships

- Criminal convictions for DBS check
- Any additional information you supply with your application

### **Special categories of data**

The following data is collected and stored anonymously for the purposes of monitoring. You do not have to provide it and it won't affect your employment if you choose not to.

- Ethnic origin
- Religion
- Gender
- Age
- Marital status
- Sexual orientation
- Disability

### **When you work for us we may collect the following additional information:**

- Driving licence checks for penalty points
- Health information
- Emergency contact details
- Bank details
- Date of birth
- Performance assessments by managers and supervisors
- Attendance and other general employment records
- Location of employment
- Salary, annual leave, pension and benefits information
- Information about your use of our information and communications systems

### **How is your personal information collected?**

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

## Why do we collect this information?

The information we collect when you apply and, if you are subsequently offered a position with us falls under Article 6 (1) (b) of the General Data Protection Regulation. 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract'.

Where we collect health information, this is processed under article 9 (2) (h) for the 'assessment of working capacity of an employee'.

We are likely to use this information for the following specific purposes:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.
- We will use information about criminal convictions in determining whether to offer employment or in determining whether to dismiss or take any other action in relation to your employment.
- Unusually, we may use sensitive personal information in connection with any legal claim.

### **Who do we share your information with?**

Internally, relevant elements of your information will be available to your line manager, HR , payroll and the CEO. Occasionally information may be provided to other employees or board members as necessary (e.g. in the context of disciplinary, grievance or other formal or informal processes).

We may share your data with third parties, including third-party service providers. This includes but is not limited to HMRC for tax purposes and SHPS for pensions. In some cases such as suspected criminal activity we may share information with the police.

If we need to share your information with anyone else we will ask for your consent .

We do not anticipate transferring your data outside of the EEA.

### **How long will we keep your information?**

If you are not shortlisted we will delete your information 12 months after the interview.

If you are shortlisted we will keep your information for 12 months after the interview.

If you enter our employment we will keep your personnel file for 6 years and one month after your leaving date.

If we hold any health information related to asbestos we will keep this for 40 years.

Accident records will be kept for 6 years from the date of the accident.

## What are your rights?

**Right to see what information we have:** You have the right to obtain access to your own personal data at any time. Information will be supplied within one month of receipt of the request. You can make a request by asking your line manager or the DPO.

**Right to correct errors:** You can ask us to change your information if it is wrong.

**Right of erasure:** You have the right to request the deletion of personal data where there is no reason for us to continue to keep it.

**Right to ask us to stop using your information:** Under certain circumstances, you have a right to 'block' the use of your personal data.

**Right to data portability:** You may be able to ask us to transfer your personal data to another employer.

**Right to object:** You have the right to object to us using your data for direct marketing or where we are using it for our own business interests.

**Right to Complain:** You have the right to complain to the supervisory body Information Commissioner's Office (ICO) if you feel we have failed to meet our duties or obligations in relation to your personal data.

**You Maintain the Right to Withdraw Consent at any Time:** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose you can withdraw this at any time. This right only applies to information you have given us where we do not have any other lawful reason to keep it.

## Changes to our privacy notice

This privacy notice will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.