



## Catalyst Housing Ltd and Aldwyck Housing Group Limited

### Privacy statement for employees

1 May 2019

#### Key points:

- **Why do we use your data?** We typically use your personal information for purposes related to your employment relationship with us.
- **We use your sensitive data:** In performing our role as your employer, we may use information about your health, racial and ethnic origin, sexual orientation, religion and membership of a trade union.
- **Sharing data:** We may share your data with third parties, including third-party service providers, subsidiaries and other entities in the group.
- **Security:** We respect the security of your data and treat it in accordance with the law.

#### 1 Purpose of our privacy notice

- 1.1 Under data protection legislation, we are required to explain to you why we are asking for information about you, how we intend to use the information you provide and whether we will share this with anyone else.
- 1.2 This statement applies to all current and former employees directly engaged by us under a permanent, fixed term or temporary contract.
- 1.3 This statement does not form part of any contract of employment or other contract to provide services. We may update this statement at any time.
- 1.4 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information we hold about you so that the information which we hold is accurate and current.

## 2 Who are we?

### 2.1 We are:

2.1.1 Catalyst Housing Ltd (**Catalyst**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU; and

2.1.2 Aldwyck Housing Group Limited (**Aldwyck**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.

2.2 Any reference to “we”, “our” or “us” in this statement is a reference to both Catalyst and Aldwyck.

2.3 We are "data controllers", meaning that we are responsible for deciding how we hold and use personal information about you.

## 3 The merging of Catalyst and Aldwyck

3.1 Catalyst and Aldwyck are merging and further information about how this will affect will be provided during the merger process on our intranet site, via our employee representation groups (ICC and VOCAL) and from the management team. If you require more information please speak to your line manager or contact [Data.Protection@chg.org.uk](mailto:Data.Protection@chg.org.uk)

3.2 In the short term, Catalyst and Aldwyck will remain as two separate entities, with Aldwyck a subsidiary of Catalyst. Eventually, Catalyst and Aldwyck will combine to create a single entity.

3.3 This privacy statement has been updated to explain how your personal information will be effected during the merger process (i.e. whilst Catalyst and Aldwyck are two separate entities), which we expect to be finalised by April 2021. Once the merger is complete, we will provide you with an updated privacy statement.

3.4 If you are a **current or former employee of Aldwyck**, your personal information will be gradually migrated to Catalyst during the merger process, and that information may be processed by Catalyst:

3.4.1 as Catalyst's and Aldwyck's information systems are gradually merged;

3.4.2 in order for you to work alongside Catalyst employees to carry out your job role;  
or

3.4.3 where this is necessary for any of the reasons set out at paragraph 8 below.

As this progresses, we will be providing you with regular updates.

3.5 If you are a **current or former employee of Catalyst**, your personal information will remain on Catalyst's systems and will not be transferred to Aldwyck. During the merger process, your information may be accessed and/or used by Aldwyck:

3.5.1 as Catalyst's and Aldwyck's information systems are gradually merged;

3.5.2 in order for you to work alongside Aldwyck employees to carry out your job role;  
or

3.5.3 where this is necessary for any of the reasons set out at paragraph 8 below.

#### **4 Our Data Protection Officer**

4.1 Our Data Protection Officers are responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

4.2 If you have any concerns or questions about our use of your personal data you can contact the Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing:  
[data.protection@chg.org.uk](mailto:data.protection@chg.org.uk)

#### **5 Why are we collecting your information?**

5.1 The information that you provide to us is required in order for us to provide you with our basic services under your contract of employment with us. Without this information, we may not be able to employ you.

5.2 In some instances, we may use information about you for purposes which, whilst not strictly necessary in relation to your employment contract, are related to your employment (such as the conduct of staff surveys, measuring equality in the workplace, complying with our legal obligations, etc).

#### **6 What information are we collecting?**

6.1 We are collecting information about you which is relevant to your employment. This includes:

6.1.1 **personal details** (such as name, date of birth, gender, marital status, national insurance number, nationality, passport information, height, weight and clothing size);

- 6.1.2 **contact details** (such as your address, personal telephone number and personal email address);
- 6.1.3 **confirmation of your identity** (such as photographs and a copy of your driving licence);
- 6.1.4 **recruitment information** (such as copies of right to work documents, professional qualifications, language capabilities, training courses attended, references and other information included in a CV or cover letter or as part of the application process);
- 6.1.5 **information about your family and others** (such as dependants, next of kin and emergency contact numbers);
- 6.1.6 **information about your remuneration** (such as bank account details, payroll records, tax status information, salary history, pension and benefits);
- 6.1.7 **information about your employment with us** (such as start and end date, location of employment / workplace, holiday entitlement and requests, records of absences and information around resignation or termination of employment);
- 6.1.8 **information about your previous employment** (such as job titles, work history, working hours, training records, professional memberships, salary / compensation history);
- 6.1.9 **your performance with us** (such as appraisal information, individual performance reviews and colleague and customer feedback);
- 6.1.10 **information relating to benefits** (such as occupational health records and referrals, sick pay, pensions, insurance and parental leave);
- 6.1.11 **Vehicle information** (such as driving licence number, vehicle registration and driving history);
- 6.1.12 **disciplinary and grievance information;**
- 6.1.13 **security information** (such as CCTV footage and key card information); and
- 6.1.14 **information about your use of our information and communications systems** (such as emails, calls, correspondence and other communications).

## ***Special categories of personal data***

6.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect include:

6.2.1 information about your **race or ethnicity, religious beliefs, sexual orientation and political opinions;**

6.2.2 **trade union membership;**

6.2.3 information about your **health**, including any medical condition, health and sickness records, occupational health records and referrals; and

6.2.4 information about **criminal convictions and offences.**

## **7 Source of your personal information**

7.1 The above information which we collect about you will be obtained through a variety of sources which include:

7.1.1 from you directly as part of the recruitment/appointment process, including through application or enquiry forms and any psychometric evaluation or skill test;

7.1.2 from third parties as part of the recruitment/appointment process (such as employment agencies, background check providers, former employers, credit reference agencies); and

7.1.3 information obtained about you in the course of job-related activities throughout the period of your role with us.

## **8 How and why we use your personal data**

8.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.

8.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
<p>The <b>recruitment process</b>, such as 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 and, where necessary and authorised by law, reviewing your criminal convictions and offences to assess your suitability for a particular role.</p>	<p><b>Contract:</b> It is necessary in order for us to enter into an employment contract with you.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your potential employer.*</p>
<p><b>Workplace adjustments / health and safety:</b> 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.</p>	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p> <p><b>Health:</b> It is necessary to assess the working capacity of our employees*</p>
<p><b>Monitoring performance</b>, such as conducting performance reviews, managing performance and determining performance requirements, considering education, training and development requirements and assessing qualifications for a particular job or task, including decisions about promotions.</p>	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p>
<p><b>Payment and salary</b> related activities (such as making payments to you, deducting tax and National Insurance contributions, liaising with your pension provider and making decisions about salary reviews and compensation.</p>	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p>
<p>Providing <b>benefits</b> to you, such as occupational health benefits, administering parental leave, including maternity, paternity</p>	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p>

Why we use your information	Our lawful basis for using your information
and adoption leave, and making pension contributions.	<b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*
<b>Day to day employment activities</b> , such as administering the contract we have entered into with you and business management and planning, including accounting and auditing.	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p>
<b>Grievance, disciplinary or legal disputes</b> , such as gathering evidence for possible grievance or disciplinary hearings; and dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Legal claims:</b> It is necessary for the establishment, exercise or defence of legal claims*</p>
<b>Determining your continued employment / engagement</b> , such as making decisions about your continued employment or engagement and making arrangements for the termination of our working relationship.	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p>
<b>Monitoring your health</b> , such as ascertaining your fitness to work, managing sickness	<b>Contract:</b> It is necessary in order for us to perform our employment contract with you.

Why we use your information	Our lawful basis for using your information
absence and complying with health and safety obligations.	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p> <p><b>Health:</b> It is necessary to assess the working capacity of our employees*.</p> <p><b>Consent:</b> In certain situations, we may require your consent in order to obtain and disclose information about your health.*</p>
<p><b>Monitoring your use of our information and communication systems</b> 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; and to conduct data analytics studies to review and better understand employee retention and attrition rates.</p>	<p><b>Contract:</b> It is necessary in order for us to perform our employment contract with you.</p> <p><b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).</p>
<p>To <b>comply with our legal obligations</b> such as to prevent fraud.</p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Legitimate interest:</b> It is necessary for our legitimate interests (where they are not overridden by your rights).</p>
<p><b>Staff surveys</b> to receive your views on the ways in which we could improve our services and improve your employment environment.</p>	<p><b>Consent:</b> We will only collect and use this information if you have provided your consent for us to do so.</p>
<p><b>Equality:</b> We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sex life</p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p>



Why we use your information	Our lawful basis for using your information
or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting	<b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*
<b>Trade unions:</b> 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.	<b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.  <b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*
* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health	

## 9 What may happen if you do not provide your personal information?

9.1 If you refuse to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

## 10 Complying with data protection law

10.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:

10.1.1 used lawfully, fairly and in a transparent way;

10.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;

10.1.3 relevant to the purposes we have told you about and limited only to those purposes;

10.1.4 accurate and kept up to date;

10.1.5 kept only as long as necessary for the purposes we have told you about; and

10.1.6 kept securely.

## 11 Sharing your information

- 11.1 We will share your personal information with third parties where we have a lawful basis for doing so.
- 11.2 The types of organisations with whom we share your personal data are as follows:
- 11.2.1 pension providers, so they can provide pension services to you, including after your employment with us has ended;
  - 12.2.2 payroll bureau service providers, so that we can process payments to you;
  - 12.2.3 information technology providers, who host online systems which enable us to manage employee information, including absence reporting and HR management;
  - 12.2.4 criminal records bureau providers, for carrying out DBS checks;
  - 12.2.5 occupational health advisors, for occupational health services;
  - 12.2.6 insurance providers, for the payment of health related insurance benefits;
  - 12.2.7 childcare voucher service providers, for processing and providing childcare vouchers;
  - 12.2.8 fleet management and service providers, for essential breakdown services provided to employees who are essential care users;
  - 11.2.9 optional benefits providers;
  - 11.2.10 subsidiaries and other entities in the group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data (for more information on Catalyst and its subsidiaries, please go to [www.chg.org.uk](http://www.chg.org.uk));
  - 11.2.11 the police and other law enforcement agencies for the purpose of detection and prevention of crime;
  - 11.2.12 regulators or professional registration organisations (e.g. in respect of fitness to practice hearings); and

11.2.13 third parties in the context of the possible sale or transfer of services in which you are involved.

11.2.14 organisations with a function of auditing and / or administering public funds for the purpose of detection and prevention of fraud.

## **12 Transferring your information abroad**

12.1 We will not transfer your information outside of the European Economic Area.

## **13 Security of your information**

13.1 The information that you provide will be stored securely on our systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.

13.2 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained by contacting our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

13.3 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **14 Can we use your information for any other purpose?**

14.1 We typically will only use your personal information for the purposes for which we collect it. It is possible that we will use your information for other purposes as long as those other purposes are compatible with those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

14.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

## **15 Storing your information and deleting it**

- 15.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the intranet.
- 15.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 15.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 15.4 Once you are no longer an employee we will retain and securely destroy your personal information in accordance with our data retention policy.

## 16 Your rights

- 16.1 Under certain circumstances, by law you have the right to:
- 16.1.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 16.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 16.1.3 **Request erasure** of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- 16.1.4 **Object to processing** of your personal information if we are relying on a legitimate interest (or those of a third party) or public interest as our lawful basis for processing and there is something about your particular situation which leads you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.

16.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

16.1.6 **Request the transfer** of your personal information to another party in certain circumstances.

16.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

## 17 **Right to withdraw consent**

17.1 In the circumstances where we are relying on your consent as our lawful basis to process your data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

17.2 Where we are relying on your consent to process your data, to withdraw your consent please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

17.3 Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 18 **Automated decision making**

18.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## 19 **Right to complain to the ICO**

19.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## 20 **Changes to this privacy statement**

20.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.