

How we use your personal information:

Orkney Housing Association is known as a “Controller” of the personal data provided to us and is registered with the Office of the Information Commissioner (Z4942508). We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

The information we collect from you will primarily be basic personal and contact details required to carry out our major functions as a social housing provider, however there are occasions where we are required to collect data of a more sensitive nature and this will be treated with the appropriate level of confidentiality.

If you have any questions relating to this notice and our privacy practices you should contact our Head of Corporate Governance, who is the central point of contact for GDPR purposes, by email dataprotection@ohal.org.uk or by calling the office on 01856 875253.

The personal information we may collect about you includes:

- Personal Details: name, addresses and date of birth;
- Contact Details: home phone number, mobile number, and email address;
- Further Details: NI number, gender, ethnicity, disability, age range, signature;
- Employment and Education history;
- Employment Application Details: asylum status, criminal record declaration, potential conflicts of interests, professional qualifications and memberships.

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so we have a record of what happened.

We will not collect any personal data from you that we do not need.

We need your personal information to:

- Meet our legal and statutory obligations including information we have to provide to regulators and statutory authorities;
- Reach and communicate a recruitment decision and produce an offer of employment where appropriate.

Sharing of Your Information:

All personal data we process is processed by our staff in the UK. We sometimes need to share personal information with other organisations, however, where this is necessary we are required to comply with all aspects of the GDPR. Even when this is required, we only share data within the European Union (EU). We do not give anyone else access to your information in return for payment, for their marketing or commercial purposes.

In the event of an offer being made we will request references from your named referees and will not share your personal information.

We are required to share information with statutory bodies governing finance and housing sectors or for auditing and inspection purposes. However, this will be restricted to the actual information required and will mainly be viewed within the Association’s office, with strict permission set on our electronic file system to ensure use is controlled. We will also encrypt and limit the content of any files that do have to be sent either electronically or otherwise.

Special Category Data:

There are certain occasions where it will be necessary to perform our functions as a social housing landlord for us to share information containing special categories of data. Currently the only sensitive information we share is ethnic origin, disability, gender and age range which is reported as a statistical breakdown of job applicants only, not including any actual personal data.

Third Party Access:

Any 3rd party who the Association gives access to our electronic files is called a Data Processor as they are processing data on our behalf. Although the Data Controller and Data Processor are two separate entities, we are required to ensure all 3rd party access is given in compliance with all GDPR principles, and to this effect will have a 3rd party access agreement in place. Only IT maintenance/support contractors, and auditors are given controlled access to our electronic network for reasons of security, maintenance, or any specific purposes outlined in their 3rd party agreement.

Protection of our staff and 3rd parties:

If you display challenging, abusive or violent behaviour to Association staff, customers or other residents, we may decide to place a "flag" on your record to protect Association staff. If we do this, we will write and tell you why, you will have the right to appeal against our decision as per our Unacceptable Actions Policy. We will share this information with, for example our contractors or the Fire Service to protect their staff also.

Storage of Your Personal Information:

The Association is committed to holding your personal information securely. This means only those staff that need to see it have access. Where we store your personal information and can do so solely on computers we will, however there will be cases where we have paper copies instead,

or in addition to this. All computers are kept in secure locations and are password protected. Electronic files kept on the shared network accessed by our computers are controlled by strict access permissions so data is only available to those who need to use it. Paper files containing personal or sensitive information are kept in locked drawers, cabinets or rooms. Our computer systems are located at our offices in Victoria Street. We occasionally may use computers or laptops offsite, however these are at all times secure and under our control.

We will keep your personal details for no longer than necessary. Once the information is no longer required for the lawful purpose for which it was obtained it will be destroyed securely.

Your Rights:

You are entitled to request a copy of any personal data we hold of yours. If any of the information we hold is incorrect you may request to have it corrected or deleted. You have the right to ask us not to process all or part of the personal information we have received, however we may be unable to provide our service to you if we are unable to record and process certain details.

If you wish to complain about how we have handled your data you can contact our Head of Corporate Governance who will investigate the matter on your behalf. If you are not satisfied with our response you may submit a formal complaint to the Information Commissioners Office:

The Information Commissioner's Office –
Scotland
5 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

Should an offer of employment be made a copy of the Employee Fair Processing Notice will be provided.