

Fair Processing Notice

Orkney Housing Association Limited – Job Applicant
(updated May 2026)



The Data (Use and Access) Act 2025 (“DUA”) and associated legislation/regulation will make changes to data protection law meaning that the functions of the Information Commissioner will be transferred to the Information Commission. At the time of preparing this Notice these changes are yet to come into force. Until such time as these changes come into force references in this Notice to the “Information Commission” (and any associated expressions) should be treated as a reference to the Information Commissioner.

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 Commission (IC) under registration number Z4942508. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 and UK GDPR, 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 Data Protection Officer, who is the central point of contact for data protection 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 phone number and email address;

- Anonymously - gender, ethnicity, disability and age range;
- NI number, 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 Data Protection Act 2018. Even when this is required, we only share data within the UK. We do not give anyone else access to your information in return for payment, 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 anonymously 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 Data Protection 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.

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.

We store your personal information electronically. 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. 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 have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- ask us to correct any inaccuracies of fact in your information;
- request that we restrict your data processing or object to our processing in certain circumstances;
- data portability (in certain circumstances);
- make a request to us to delete what personal data of yours we hold; and
- submit a complaint to us if you believe your personal data has been handled in a way that does not comply with data protection law.

If you would like to exercise any of your rights above please contact us at dataprotection@ohal.org.uk. **You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.**

If you have any complaints about the way your data is processed or handled by us, please contact the Data Protection Officer on dataprotection@ohal.org.uk.

If you remain unsatisfied after your complaint has been processed by us, you also have the right to complain to the Information Commission in relation to our use of your information. The Information Commission's contact details are:

The Information Commission—Scotland
6th Floor,
Quartermile One
15 Lauriston Place
Edinburgh
EH3 9EP

Telephone: 0303 123 1113
Email: Scotland@ico.org.uk

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

A full Fair Processing Notice, including details of how we collect, process, share and manage data from all clients can be found on-line or by contacting our office.

The accuracy of your personal information is important to us. Please help us keep our records up-to-date by informing us of any changes. Thank you.