

# Employee and Board Member Privacy Notice

Jigsaw

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# 1 Aims

1. Jigsaw Homes Group Limited recognises the importance of respecting your personal privacy and the need to have in place appropriate safeguards surrounding the processing of personal data. As a company who has access to and controls your personal data (a 'Data Controller') we are required to provide you with certain information about how we collect, store, destroy and otherwise deal with (also known as 'process') your personal data. We are also registered with the Information Commissioner's Office (ICO) as a Data Controller.
2. This privacy notice describes how we collect and use personal information about you before, during and after your working or other contractual relationship with us. It applies to all candidates/applicants, employees, workers, contractors, persons on work placement/work experience and board members.
3. This notice does not form part of any contract of employment or other contract to provide services. We may amend or update this notice at any time. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

## 2 Who Is the Data Controller and What Are Their Contact Details?

4. The Data Controller is the company that decides the purpose for and the way in which your personal data is processed. Jigsaw Homes Group Limited and certain subsidiaries are data controllers registered with the ICO and details of all of the subsidiaries are set out below.

### Jigsaw Homes Group Limited

ICO registration number: Z832622X. Registered as a Community Benefit Society with FCA, registration number: 29433R. Housing Regulator registration number: Z832622X.

### Jigsaw Homes Midlands

ICO registration number: Z1599688. Registered as a Community Benefit Society with FCA, registration number: 8378. Housing Regulator registration number L4532

### Jigsaw Homes North

ICO registration number: Z1657414. Registered as a Community Benefit Society with FCA, registration number: 16668R. Housing Regulator registration number: LH0131

## Jigsaw Homes Tameside

ICO registration number: Z1599674. Company number 3807022. Charity Commission number 1146435. Housing Regulator registration number: LH4266

## Jigsaw Support

ICO registration number: Z6749053. Company number: 8241

5. The registered office address for all the above companies is:  
  
Cavendish 249, Cavendish Street, Ashton-under-Lyne OL6 7AT
6. In most cases the Data Controller will be the company who:
  - employs you;
  - you work for on a temporary/fixed term basis;
  - you make a job application to;
  - you undertake work for as a board member.
7. If you are in any doubt as to who your Data Controller is please get in touch with our Data Protection Officer.
8. The Data Protection Officer for the Jigsaw Group is contactable via email on [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk) and in writing at:

Jigsaw Homes Group, Cavendish 249, Cavendish Street, Ashton-under-Lyne  
OL6 7AT

## 3 What Information Do We Collect About You and How?

9. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) and there are 'special categories' of more sensitive personal data which require a higher level of protection.
10. In our capacity as an employer and registered company we collect and hold personal information about the following, subject to agreed retention periods:
  - employees - this includes current and former employees;
  - applicants for employment - successful and unsuccessful;
  - work placements - such as those on approved programmes;

- agency workers and contractors;
- board members - current and former board members.

11. Members of the Jigsaw Homes Group may share with other members of the Group personal information that they collect about you.

## **4 Applicants for Employment and Board Membership**

12. As an applicant for employment we shall collect and hold the personal information about you which you provide to us when completing and submitting our application form.
13. The application form may include health information. This is a category of sensitive personal information which applicants for employment may be asked to provide to establish whether they can carry out a function which is intrinsic to the work concerned, and to discover whether it is necessary to make any reasonable adjustments to our recruitment process to assist you.
14. Other personal information on the application form will be reviewed by the managers involved in the recruitment process in order to assess your suitability for potential employment.
15. If your application is unsuccessful the application form and any information supplied with it will be retained by us for up to four months and then discarded. Alternatively, if you are employed or engaged by us as an employee, worker or contractor it shall be retained and stored securely for the duration of your employment and for a reasonable period thereafter (see below for more information about retention of data).

## **5 Employees, Workers, Contractors, Work Placement/work Experience & Board Members**

16. If you become an employee, worker, contractor or board member or undertake a work placement/work experience with us we may collect, store, and use the following categories of personal information about you:
17. personal contact details such as name, title, postal address, telephone numbers, and a personal email address;
- date of birth;
  - gender;
  - marital status and dependants;
  - next of kin and emergency contact information;
  - national insurance number;

- bank account details, payroll records and tax status information;
- salary, annual leave, pension and benefits information;
- start date;
- location of employment or workplace;
- copy of driving licence and other information we may obtain from the DVLA should it be necessary to check your driving licence for penalty points where you are required to drive for work on company business;
- speeding penalty notices (company car drivers only);
- penalty notices for parking and minor road traffic offences (company car drivers only);
- motor vehicle details (for employees in receipt of a car allowance or mileage payments);
- Vehicle tracking data (for company fleet vehicles)
- recruitment information which may include copies of right to work documentation, proof of identity (such as passports) references (from other employers) and other information included in a CV or cover letter or gathered as part of the application and interview process;
- employment records including job titles, work history, working hours, training records, skills, experience, professional memberships and qualifications;
- accident records;
- performance/appraisal information;
- board attendance records;
- information relating to work attendance and absence and punctuality;
- disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means such as swipe card records;
- information about your use of our information and communications systems;
- photographs;
- any relationships with tenants, board members or employees;
- any interest in any organisation which has contracts with or does business with any one of the companies within the group; and
- we may record public meetings for the purposes of holding accurate records.

18. We may also collect, store and use the following ‘special categories’ of more sensitive personal information:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership;
- information about your health, including any medical condition/disability, health and sickness records which may also include information from our occupational health provider about your fitness to undertake the role for which you've been employed; and
- information about criminal convictions and offences which may be obtained from the Disclosure and Barring Service (should the role you are required to undertake require a DBS check).

19. The above personal information is collected through the application and recruitment or work placement process, either directly from candidates or sometimes from an employment agency or background check provider.
20. 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 you work for us.
21. We may also collect limited personal information relating to members of your family or a partner where this is required so that we have contact details for next of kin in the event of an emergency.
22. Data will be stored in a range of different places including on your application form and other associated recruitment documents and in HR software management systems and on other IT systems (including email). It is important that you notify us of any changes to your personal information as soon as possible. If you have access to the HR self-service portal you can update the majority of your personal data yourself. If you do not have access you should contact the People department.
23. We may, for publicity purposes, use photographs of you as an employee or board member of Jigsaw Homes Group. If you do not wish a photograph of you to be used in this way please contact the People department.
24. In exceptional circumstances the Group may use covert CCTV surveillance of employees, eg. as part of a specific investigation into suspected criminal activity. In such circumstances, a privacy impact assessment will be carried out by the People Department and signed off by a Group Director to ensure that the surveillance is carried out for the shortest possible period and affects as few individuals as possible.
25. In exceptional circumstances, we may also use CCTV, mobile phone or camera footage or audio recordings provided to us for the purposes of evidence in a disciplinary investigation against an employee.
26. We may record training sessions delivered to board members and/or employees and your image and/or voice may be recorded as part of this process. We may share these recordings with other board members and/or employees. If you do not wish your image and/or voice to be recorded or the subsequent recording to be shared with other persons not participating in the original training session, please make this known to the person delivering the training before or after the training session.

## 6 What Is the Lawful Basis Under Which We Use Your Data?

27. We will only use your personal information when the law allows us to. In most circumstances we will be using your information in order to:
- perform the contract we have entered into with you or (at your request) take steps prior to entering into a contract with you (for example, where we are processing your application form);
  - comply with a legal obligation that we are subject to; or
  - meet our own legitimate interests (or those of a third party) but only where doing so will not override your interests and fundamental rights.
28. We may also use your personal information where: (1) we need to protect your interests (or someone else's interests); or (2) it is needed in the public interest or for official purposes. These two situations are likely to be rare. The more common reasons we will use your personal data include, for example, processing your data in order to ensure you are paid each month or perhaps where we need to make a referral to occupational health to support your fitness to work (both relate to our contract with you).

## 7 Change of Purpose

29. We will only use your personal information for the purposes we originally collected it unless we consider it reasonable to use it for another purpose and are satisfied that is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
30. Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

## 8 Do I Have to Provide This Information and What Will Happen if I Don't?

31. If you fail 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), deal properly with an application form (where you are applying for a position with us) or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).
32. Where we ask in any application form for you to provide equal opportunities monitoring data (which includes ethnicity, sexual orientation, etc.), there are no consequences for your application if you choose not to provide such information.



## 9 How Will We Use the Information About You?

33. We may use your personal information to undertake the actions below but please note this list is not exhaustive and there may be more than one ground which justifies our use of your personal information:

- make a decision about your recruitment or appointment;
- determine the terms on which you may work for us and administer any contract we enter into with you;
- check you are legally entitled to work in the UK;
- communicate with you about matters relating to your employment;
- ensure that we pay you correctly and into the bank or building society of your choice and, if you are an employee (or otherwise in receipt of payments from us), deductions of any tax and national insurance contributions are made;
- ensure that your records of employment are accurate in respect of statutory bodies such as DWP, HMRC and ONS and liaising with any such body as may be necessary;
- provide employment benefits to you such as a company car or car allowance, simply health cover, death in service cover, pension and any bonuses, etc.;
- business management and planning including accounting and auditing;
- conducting performance reviews, managing performance and determining performance requirements;
- making decisions about salary reviews and compensation;
- contact those people you have identified as your emergency contacts in the event of an accident at work or other serious incident;
- prepare anonymous data in aggregate format to the Board on protected characteristics such as age, ethnicity, gender, transgender, sexual orientation, religion or belief, and disability. The purpose of this is to determine if our workforce is truly representative of the communities that we serve, and to assist us with advertising campaigns to target specific groups that may be under represented as part of a general recruitment campaign. This is called 'monitoring data' and it will also be used to identify and tackle instances of discrimination and harassment;
- ensure that you are entitled to drive a vehicle on company business;
- ensure that you receive appropriate reasonable adjustments in the workplace pertaining to a disability you may have and remain fit to carry out the role that you are employed to do ;
- comply with reasonable requests for data from the police;

- pay trade union subscriptions to the trade union of your choice directly from your salary;
- ensure that you can meet the necessary requirements of the role that you are employed to carry out, such as through a DBS check or occupational health checks such as health surveillance (which consists of regular ongoing checks, eg. hearing tests, that are linked to specific roles and ensure compliance with health and safety legislative requirements);
- assess qualifications for a particular job or task, including decisions about promotions;
- gather evidence for possible grievance or disciplinary hearings;
- make decisions about your continued employment or engagement;
- make arrangements for the termination of our working relationship;
- help determine education, training and development requirements;
- deal with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- complying with health and safety obligations;
- prevent fraud;
- monitor your use of our information and communication systems to ensure compliance with our IT policies;
- ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- if opting to connect to Jigsaw’s wifi network when visiting our offices, Jigsaw will collect and retain device ID’s (e.g. MAC/IP Address; host name), which may be linked to other personnel records and so constitute personal data;
- conduct data analytics studies to review and better understand employee retention and attrition rates.
- Provide relevant details to insurers, solicitors or other third parties as required for the management of claims.

## 10 Sensitive Personal Data

34. Certain personal information is classified as ‘special categories data’ and means any personal data which tells us about your ethnic origin, political opinion, religious or philosophical beliefs, trade union membership or anything revealing your genetic data, biometric data or anything which has the purpose of uniquely identifying you, anything concerning health or data relating to a person’s sex life or sexual orientation, allegations of criminal offences and criminal convictions and offences.

35. We minimise our holding and use of special categories data but there are times when we use it to understand our employees, workers, etc. and their needs better. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information as follows:

- in limited circumstances, with your explicit written consent;
- where we need to carry out legal obligations imposed on us (such as under the Equality Act 2010) and in line with our data protection policy;
- where it is needed for reasons of public interest, such as for equal opportunities monitoring and in line with our data protection policy; or
- where we need to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- We may also process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. However these occurrences may be less common.

## **11 Will You Be Using My Information to Make Any Automated Decisions?**

36. We do not propose to use your personal data to make any automated decisions. Should our policy change, we will write to you and tell you this.

## **12 Consent**

37. We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in relation to areas of employment law. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive data. Where we do this, we will provide you with full details of the information that we would like and the reason we need it so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## **13 Information About Criminal Convictions**

38. We will only collect information about criminal convictions if it is appropriate given the nature of any role you may undertake with us and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly

by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- assessing your suitability for employment;
- making decisions about your continued employment or engagement; and
- ensuring compliance with safeguarding legislation where relevant.

39. We are allowed to use your personal information in this way where it is necessary for our legitimate interests (and your interests and fundamental rights do not override those interests) and it is also necessary for the purposes of exercising rights conferred by law on us in connection with employment and provided we do so in line with our data protection policy.
40. We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.
41. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.
42. We envisage that we will hold information about criminal convictions in line with our retention policy.

## **14 Who We Will Share/send Your Information to**

43. We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.
44. 'Third parties' includes third party service providers (including contractors and designated agents) and other entities within our group of companies.
45. The following activities are carried out by third party service providers:
- pension administration;
  - benefits provision and administration; and
  - certain IT services.
46. All our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. Data is provided to our third party service providers for specified purposes and not for use for their own purposes.

47. We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.
48. We may share your personal information with:
- other third parties, for example in the context of the possible sale or restructuring of the business;
  - a regulator or to otherwise comply with the law;
  - former employers/organisations to obtain references for you;
  - our occupational health service provider/s relating to your health (where this is applicable to any specific role you have with us);
  - the Disclosure and Barring Service to obtain necessary criminal records checks (where this is applicable to your specific role);
  - companies in the provision of non-contributory employee benefits such as Simplyhealth and permanent health insurance;
  - companies that provide you with a benefit that you have opted to join on a voluntarily basis
  - ACAS in the event of employee disputes; or
  - HMRC, HMCTS or a local authority to respond to statutory requests for information or court orders.
  - Your personal information will be kept secure and confidential. Access to it will be restricted to those managers and other members of staff who require the data in order to ensure compliance with:
  - legal obligations (such as health and safety and employment laws);
  - any contract we have with you; and
  - to protect your vital interests, etc. or for other purposes as set out above.
49. We require third parties to respect the security of your data and treat it in accordance with the law.
50. We will not share your data with any organisation outside of the European Economic Area; with the exception of our material supply arrangements which, in some cases, may require employee names and work contact details to be processed in India as part of our supplier's purchase ledger activities.

## 15 Changes to This Privacy Notice

51. This privacy notice will be updated to reflect any 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.

## 16 How long Will You Store My Personal Data for?

52. 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. We store personal data in line with best practice guidance from the National Housing Federation, a copy of which is available on request. Examples are:
- applications for employment for unsuccessful candidates: kept for six months after the closing date for the job;
  - personal records of former employees: kept for six years after employment ceases;
  - supplying employment references for former employees: 20 years after employment ceases; and
  - health surveillance records that test for occupational COSHH, noise, vibration, lead and asbestos: 40 years.
53. 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

## 17 How Will My Personal Data Be Stored and Kept Secure?

54. The Group applies technical measures to keep personal data stored securely on information systems, including controls over the organisation's information network perimeter, such as firewall, anti-virus software and back-up/replication measures to prevent data loss. Access to personal data held on systems is controlled by restricted access and can be monitored by audit records on our document management system. Sharing of data with third parties is controlled by the use of secure transfer measures such as encrypted email and secure file transfer protocols.
55. The data held on mobile devices (smart phones, tablets and lap-tops) used by staff are encrypted. Staff are equipped with lockable bags for carrying personal data files outside of the office and we apply a clear desk policy in our offices.
56. The technical measures are supported by training and awareness raising exercises to ensure that staff understand the risks and their responsibilities for keeping personal data secure.
57. Once you are no longer an employee, worker, on placement/work experience, contractor or board member, we will retain and securely destroy your personal information in accordance with our retention policy, applicable laws and regulations.

## 18 Your Rights in Relation to the Personal Data You Provide

58. We have set out below some information on the rights you have under the General Data Protection Regulation. More information can be found by visiting the ICO website at [www.ico.org.uk](http://www.ico.org.uk).
59. You have the right to:
- be informed about our collection and use of your personal data;
  - access the personal data we hold about you (see below);
  - ask us to rectify any personal data we hold about you if it is inaccurate or incomplete;
  - be forgotten - i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time as explained above but if you would like us to delete it sooner please contact us). Please be aware however that we need to maintain certain records to enable us to comply with any contractual or statutory obligation so certain information may still be retained despite any such request to be forgotten;
  - restrict (i.e. prevent) the processing of your personal data;
  - data portability (obtaining a copy of your personal data to re-use with another service or organisation);
  - object to us using your personal data for particular purposes;
  - rights with respect to automated decision making and profiling (we will inform you where such decisions and profiling occur); and
  - you may withdraw your consent to our use of your information where the information was previously provided with your consent, please advise us if you wish to withdraw any consent previously given by writing to [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk).
60. If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 2 above and we will do our best to solve the problem for you. If we are unable to help you also have the right to lodge a complaint with the ICO; please go to [www.ico.org.uk](http://www.ico.org.uk).

## 19 Accessing Your Information

61. You have the right to access any personal information we hold about you. There is a formal process for this known as a Subject Access Request. If you would like to make a Subject Access Request please send a request in writing to [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk) or in a letter to our registered office address above. We may require some proof of identity from you before releasing information. We are required to provide this information within one month of receiving your request and will not normally make

a charge for this service. However, we may make a charge where we consider the amount of information you have requested to be complex or if you make numerous requests, and we may then take up to three months to fulfil your request.

62. Document Control:

63. Updated 12 September 2023





## Creating homes. Building lives.

Jigsaw Homes Group Ltd.

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Cavendish Street  
Ashton-under-Lyne  
OL6 7AT

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Regulated by the Regulator of Social Housing Registration No. LH 4345

Registered under the Co-operative and Community Benefit Societies Act 2014 Registration No. 29433R

Document produced on 12 September 2023.