



February 2020

St. Leger Homes - Your Privacy Matters

St Leger Homes of Doncaster is committed to respecting and protecting your privacy by complying with UK Data Protection Law and the forthcoming General Data Protection Regulation (GDPR).

As part of our World of Work Framework (WOW, Work Experience, Apprenticeships, Student Placements), this document explains how we look after and protect your personal information during our application and recruitment process. This includes what you tell us about yourself, also about what information we use, share and keep. This applies to anything recorded on paper, by telephone or electronically, as example, via email, by St Leger Homes' staff or any of our partners or contractors.

About us:

St Leger Homes of Doncaster is an Arm's Length Management Organisation who has official authority for managing Doncaster Council homes. The majority of work we do is laid down by specific laws such as the Housing and Planning Act, however we comply with a number of different UK Housing and Homelessness laws and wider laws that apply to the rights of all individuals.

St Leger Homes of Doncaster is registered as a data controller under Data Protection Law (registration number Z9202655) because we collect and process personal information about you and use this to provide and manage our services. We have a Data Protection Officer who makes sure we respect your rights and follow the law at all times. If you have any concerns or questions about how we look after your personal information, please visit our website or contact the Data Protection Officer, Louise Robson, via DPO@stlegerhomes.co.uk or by calling 01302 862862.

Do you know what personal information is?

Personal information can be anything that identifies or relates to a living person. This can include information that when put together with other information can then identify a person. For example, this could be your name and contact details.

We use many different kinds of personal information, and group them together like this.

| Type of personal | Description |
|--|---|
| Personal details | From your application form about where you live and how to contact you. |
| Life experience | From your application – this could relate to previous work history, work experience, education or other questions relevant to the role you may have applied for. |
| Communications | What we learn about you from letters, emails and conversations between us. |
| National Identifier (usually this is requested when we make a conditional offer of employment) | A number or code given to you by a government to identify who you are, such as your National Insurance Number. |
| Open Data and Public Records | Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet. |
| Documentary Data (usually requested when we make a conditional offer of employment) | Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, driver's license, or qualification certificates. |
| Special types of data (Some information is 'special' and needs more protection due to its | This is not mandatory and it will not affect your application if you don't provide it. Any information you do provide to us will only be used to |

| | |
|--|--|
| sensitivity. It's often information you would not want widely known and is very personal to you) | <p>produce and monitor equal opportunities statistics. We will only collect and use these types of data if the law allows us to do so, these include:</p> <ul style="list-style-type: none"> • sexuality • religious or philosophical beliefs • ethnicity • physical or mental health • trade union membership • political opinion |
| Specific details (usually requested when we make you a final offer) | <p>Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, or such as the need to send information in large-print.</p> <p>You will also be asked to declare any unspent criminal convictions.</p> <p>If you are taking up a post which is subject to a Disclosure and Barring Service Enhanced Check, you will also be asked to declare any spent convictions as part of the pre-employment checks we carry out.</p> |

Where do we collect your personal information from?

We mainly collect personal information about you when you tell us however; there may be other companies or sources where we gather information from:

Data you give to us:

- When you apply for any of the World of Work initiatives (outlined on page 1) and complete and application form with us
- When you talk to us on the phone or in one of our offices
- When you use our recruitment form
- If we carry out any assessments as part of our recruitment process such as your interview notes, technical assessments, psychometric tests
- In emails and letters and forms we ask you to complete
- In satisfaction surveys

Data may also be given to us from other organisations we work with or public sites such as:

- South Yorkshire Emergency services
- Government and law enforcement agencies such as the Department for Work and Pensions (DWP)
- Other organisations or people you have listed as references
- Social Network sites or the Internet
- Medical practitioners*
- Doncaster College
- 3rd party work experience/training providers

* For some services (such as Occupational Health referrals), we may ask your GP or other medical professional to send us a report. We will only do this if we get your consent first.

So...why do we need your personal information?

This is your information so why do we need it?

In order to manage your application we will need to ask and process certain pieces of personal information about you. We may need to use some information about you to:

- Make sure you meet the criteria for the role you are applying for
- Respond to your enquiries
- Ensure the environment you work in is safe and in accordance with your needs
- Improve the management of workforce data across the sector
- Inform the development of recruitment and retention policies
- Enabling monitoring of selected protected characteristics

What happens if you don't want to give us your information?

We will always have a legal reason to collect, use and process your information and you can talk to us about any concerns you have about this at any time. If you don't want to give us your information we may not be able to carry out our employment / recruitment responsibilities with you.

How the law allows us to use your personal information?

There are a number of legal reasons why we need to collect and use your personal information. Generally we collect and use personal information where:

- You, or your legal representative, have given consent
- You have/are proposing to enter into a contract with us
- It is necessary to perform our statutory duties
- It is necessary to protect someone in an emergency
- It is required by law
- You have made your information publicly available
- It is necessary for legal cases
- It is to the benefit of public or society as a whole
- It is necessary to protect public health
- It is necessary for archiving, research, or statistical purposes

Your information will only be accessed and processed by authorised personnel (i.e. Managers, HR & OD professionals, Occupational Health professionals and pay and pensions administrators) who are directly involved in the management and administration of your recruitment and have a legitimate need to access your information.

We will only ask you for the information we need and will always use it appropriately.

Where we can, we'll only collect and use personal information if we need it. (For example, we won't ask and don't need your inside leg measurement to apply for a job with us!) We will always make sure the information we ask for is relevant and collected at the right time, for the right purpose.

If we don't need personal information we'll either keep your information anonymous or we won't ask you for it. For example, to apply for a role with us we don't need your bank details. However if you are successful in our application we will take this information from you when you join the organisation).

If we use your personal information for research and analysis, we'll always keep you anonymous.

We don't ever sell your personal information to anyone else.

What YOU can ask US to do with YOUR information.

The law gives you a number of rights to control what personal information is given to us and how it is used by us.

All of your rights are listed over the next few pages and if you have any queries about access to your information, or if you would like to see any of your personal information, please contact:

The Customer Relations Team,
St Leger Homes of Doncaster,
St Leger House, White Rose Way,
Doncaster, DN4 5AA

Or you can contact them by telephone on 01302 862726 or by emailing
CustomerCare@stlegerhomes.co.uk.

If you make a request to us about the personal information we hold about you this must be made in writing and we have **1 month** to complete your request.

You can ask us for access to the information we hold on you.

We would normally expect to share what we record about you with you whenever we assess your needs or provide you with services. However, you also have the right to ask for all the information we have about you and the services you receive from us all at once. This is called a Subject Access Request.

When we receive a request from you in writing, we must give you access to everything we've recorded about you. However, we can't let you see any parts of your record which may contain:

- Confidential information or images of other people; or
- We have received legal advice that to give out this information it will cause serious harm to you or someone else's physical or mental wellbeing; or
- If we think that giving you the information may stop us from preventing or detecting a crime.

This applies to personal information that is in both paper and electronic records. If you ask us, we can also let another named individual see your record (except if one of the points above applies).

If you can't ask in writing for your records, we'll make sure there are other ways that we can help you access this information.

You can ask us to change information you think is inaccurate.

You should let us know if you disagree with the information we hold for you. (For example, we might have the wrong email address for you or our records said that you live at '62 Smith Street', when in fact you live at '622 Smith Street').

We may not always be able to change or remove information as you request, but we'll always correct factual inaccuracies and may include your comments in the record to show that you disagree with others that we can't change.

You can ask us to delete information (this is called your right to be forgotten or right to erasure).

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason it was collected in the first place
- Where you have removed your consent for us to use your information and where there is no other legal reason for us to use it
- Where there is no legal reason for the use of your information.
- Where your personal information has been shared with others (such as a contractor), we'll take every step to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- We are required to have it by law
- It is used for freedom of expression
- It is for public health purposes
- It is for, scientific or historical research, or statistical purposes where it would make information unusable
- It is necessary for legal claims.

You can ask us to limit what we use your personal data for.

You have the right to ask us to limit or restrict what we use your personal information for where:

- You have identified inaccurate information, and have informed us of this and are waiting for us to change it
- Where we have no legal reason to use that information but you want to restrict what we use it for rather than erase the information altogether.

Where restriction of use has been granted, we'll inform you before we intend to use your personal information for any reason.

You have the right to ask us to stop using your personal information to deliver any of our services. However, if this request is approved this may cause delays or prevent us delivering that service in the future if you need us.

Where possible we'll seek to comply with your request, but we may need to hold your information and use it because we are required to by law.

You can ask to have your information moved to another provider (this is called 'data portability').

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called 'data portability'.

However this only applies if we are using your personal information with consent and if decisions were made by a computer and not a human being.

Data portability won't apply to most of the services you receive from us as we don't use computers to make automated decisions about you.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health conditions.

If you have concerns regarding automated decision making, or profiling, please contact our Data Protection Officer who'll be able to advise you about how we use your information.

Who do we share your information with?

We use a range of organisations to supply us with systems to store personal information. Wherever we share information with someone else there is always an agreement in place to make sure that the organisation complies with data protection law.

We'll often complete a privacy impact assessment before we share personal information to make sure we protect your privacy and comply with the law. Your personal information may be shared internally with:

- Employees who have managerial responsibility for the role that is advertised
- Employees in HR & OD who have certain HR & OD responsibilities

Upon receipt of an application form from you, we may also share your details with the following organisations in order to process your application form, assist in the recruitment and selection procedure and/or comply with 3rd party policies.

- The Department for Work and Pensions (DWP) and other related agencies
- Doncaster College
- 3rd party training providers
- 3rd party Work experience providers
- South Yorkshire Passenger Transport Executive
- Employees in IT and systems owners who can ensure you have the right access to systems before you start
- Security / building managers to ensure you have access to our premises

Sometimes we have a legal duty to provide personal information to other organisations. This is often because we need to give that data to courts, including:

- If the court orders that we provide the information; and
- If someone is taken into care under mental health law.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- In order to find and stop crime and fraud; or
- If there are serious risks to the public, our staff or to other professionals; or
- To protect a child; or
- To protect adults who are thought to be at risk, for example if they are confused or cannot understand what is happening to them.

For all of these reasons the risk must be serious before we can override your right to privacy.

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so. However we may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away. If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe / correct to do so.

How do we protect your information?

We have rigorous measures, policies and procedures in place to ensure the information you give us will not be seen or shared with anyone who does not need to see it in order to provide our services to you.

We will always do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them.

Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password to unlock a laptop or access a document). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it

- Training for our staff on a yearly basis allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates to make sure we don't ever suffer from a 'cyber-attack'

How long do we keep your personal information?

There's often a legal reason for keeping your personal information for a set period of time, we try to include all of these in our retention schedule.

For each service the schedule lists how long your information may be kept for. This ranges from months to decades depending on the nature of the information.

If you would like to know any more information on this, please click here* to see our retention schedule.

Where can I get advice?

If you have any worries or questions about how your personal information is handled please visit our website or contact our Data Protection Officer, Louise Robson, at DPO@stlegerhomes.co.uk or by calling 01302 862862.

For independent advice about data protection, you can also contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate)

Or, you can visit www.ico.org.uk or email casework@ico.org.uk.

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