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		Ref:	HR040
		Date:	August 2024

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1 Introduction

Goleudy is committed to protecting the privacy and security of your personal information. We make sure we comply with all aspects of the UK's data protection framework including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018)


This privacy notice describes how we collect and use personal information about you during and after your working relationship with us. It applies to all employees, workers and self-employed contractors.

It is important that you read and retain 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 and what your rights are under the data protection legislation. This notice does not form part of any contract of employment or other contract to provide services.

2 Information we collect

The types of information we collect from you might include:

- your full name and date of birth
- contact details – including your postal address, telephone number(s), and email address
- National Insurance number
- your bank details

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- records of your correspondence and engagement with us
- photographs, video or audio recordings
- occupation
- biographical information
- other information you share with us


This information may be collected via:

- any paper forms you complete
- telephone, webchat or email conversations, or face-to-face interactions
- digital forms completed via our website, or online surveys
- publicly available sources

3 How your information will be used

As your employer, Goleudy has a legitimate interest to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. We will only use your personal data when the law allows us to. Most commonly, we rely on the following legal bases to process your personal information:


Performance of a contract	This applies where we need to collect and use your personal information in order to take steps to enter into a contract with you or to perform our obligations under a contract with you
Legal obligation	This applies where we need to collect and use your personal information to comply with applicable laws and regulatory requirements
Legitimate interests	We may collect and use your personal information to further our legitimate business interests. We only do this where we are satisfied that your privacy rights are protected satisfactorily. You have a right to object to any processing of your personal information based on this legal basis (see below)

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Vital interests	Where processing is necessary to save your life or that of another person
Consent	Generally, we do not need to rely on consent as a legal basis for processing your personal data, but where we do, you have a right to withdraw consent at any time

We collect and use personal information for the following purposes, relying on the specific lawful bases set out in the table below:

Reason for processing	Legal Basis
Checking you are legally entitled to work in the UK.	To comply with a legal obligation
Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs). Making decisions about your remuneration.	Performance of a contract To comply with a legal obligation
Providing employee benefits to you.	Performance of a contract Necessary for legitimate interests Consent where this involves sharing your medical information with a third party provider.
Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties.	To comply with a legal obligation
Otherwise administering the contract, we have entered into with you.	Performance of a contract
Business management and planning, including accounting and auditing.	To comply with a legal obligation Necessary for legitimate interests
Monitoring and recording your attendance at work	Performance of a contract
Conducting performance reviews, managing performance and determining performance requirements. Assessing your qualifications for a	Performance of a contract Necessary for legitimate interests

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particular job or task, including decisions about your ongoing suitability and /or promotions.	
Gathering evidence for possible grievance or disciplinary hearings.	Necessary for legitimate interests To comply with a legal obligation To establish, exercise or defend legal rights
Education, training and development requirements.	Performance of a contract Necessary for legitimate interests
Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.	To comply with a legal obligation Necessary for legitimate interests To establish, exercise or defend legal rights
Ascertaining your fitness to work and providing appropriate workplace adjustments where legally required.	Necessary for legitimate interests To comply with a legal obligation including our obligations under employment law and social protection law
Monitoring and managing sickness absence and administering sick pay.	Performance of a contact Necessary for legitimate interests To comply with a legal obligation including our obligations under employment law and social protection law
To obtain occupational health advice where necessary	Necessary for legitimate interests Your consent is required under the Medical Reports Act 1988.
Complying with health and safety obligations.	To comply with a legal obligation To protect vital interests

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To undertake alcohol and drug testing	To comply with a legal obligation our obligations under employment law and social protection law To protect vital interests
To prevent fraud.	To comply with a legal obligation
To monitor your use of our information and communication systems to ensure compliance with our IT policies and to ensure network and information security.	Necessary for legitimate interests
To conduct data analytics studies to review and better understand employee retention and attrition rates.	Necessary for legitimate interests
To enable lone working safety policy to be enacted through the Peoplesafe app	Necessary for legitimate interests

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees. We collect personal information in the course of job-related activities throughout the period of you working for us. When you start work, we create a personnel file for all our employees on our HR and payroll systems. All of the information we have collated about you to date is stored on your electronic personnel files which are kept securely.

You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of Goleudy (for example the Business Continuity Plan may refer to your details). You should refer to the CR006 Data Protection, Privacy and Confidentiality Policy.

Where personal information has been shared by you with members of the HR team and managers in the course of dealing with employment matters, including in relation to illness, religious background, sexual orientation or other family situations, please rest assured that any information of this nature will be treated with the utmost sensitivity.

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Where necessary, we may keep information relating to your health, which could include reasons for absence and GP/Occupational Health or other medical reports and notes. This information will be used to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.


"Special categories" of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may 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.

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 the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, 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.

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 including statutory maternity pay, statutory sick pay, pensions and any employee assistance

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programmes. We need to process this information to exercise rights and perform obligations in connection with your employment.

We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

In the case of information about criminal conviction and actual and alleged offences, this will only be collected where appropriate to do so given the nature of your role. In addition, we monitor computer and telephone / mobile telephone use, as detailed in our CR007 ICT Acceptable Use policy.


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), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our worker).

Other than as mentioned in this document, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external HR provider, pension or health insurance schemes. We will also only share your personal information with third parties where we have another legitimate interest in doing so. The following activities are currently carried out by third party service providers:

- HR support
- Payroll support
- Pension administration
- Health care insurance
- Peoplesafe for lone worker monitoring app and portal
- Risk assessment software

A number of these parties, bound by obligations of confidentiality, may have access to your personal information or we may share or send it to them. This may include:

- Occupational health providers
- Suppliers that help maintain our systems or host our data

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- Other suppliers who provide us with goods, services or who give us profession advice to help us run our organisation such as accountants, lawyers, ISO auditors, commissioners and regulatory bodies.

We may also be required to share personal information in the context of a business reorganisation or restructure exercise. Personal data is also shared with regulatory authorities and government agencies such as HMRC. We do not sell, rent or otherwise make personal information commercially available to any third party.

We do not use automated decision making (including profiling on your data). However, we will notify you in writing if this position changes.


Client personal data that also contains your personal data will be retained in line with the recommendations of The Care Inspectorate Wales (CIW) and will be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements.

All other personal data relating to you and your employment with us will be retained 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 have specific retention guidelines for staff and volunteer records which can be found within CR006 Data Protection, Privacy and Confidentiality Policy.

Personal data relating to the interview of applicants who were not employed will be retained for 12 months from the communication of the outcome of the particular recruitment exercise to the applicant. This takes into account both the time limit to bring claims and for claims to be received by us. We retain personal information following recruitment exercises to demonstrate, if required, that applicants have not been discriminated against on prohibited grounds and that the recruitment exercises are conducted in a fair and transparent way.

Personal data relating to successful applicants will be transferred to their employment record and will be retained for 7 years. Unless we are required by law to retain the personal data for a longer period.

If, in the future, we intend to process your personal data for a purpose other than that for which it was collected we will provide you with information on that purpose and any other relevant information.


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4 Your rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

You have a number of rights in relation to your personal data which we have. Not all of the rights apply in all circumstances.

- You have a right of access to the personal information we hold about you
- You have the right to ask us to correct any information we hold about you that you think is wrong or incomplete
- You have the right to object to any processing of your personal information where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop. There may, however, be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- You have the right to object if we process your personal data for the purposes of direct marketing. If you no longer want to receive communications from us, please contact us. We will stop sending you communications but will continue to keep a record of you and your request not to hear from us. If we deleted all of your information from our direct marketing databases, we would have no record of the fact that you have asked us not to communicate with you and it is possible that you may start receiving communications from us at some point in the future, if we obtain your details from a different source.
- You have the right to ask us to delete your information. This is also known as the right to be forgotten or to erasure. We will not always agree to do this in every case as there may be legal or other legitimate reasons why we need to keep or use your information. If this is the case, we will consider your request and explain why we cannot comply with it. You can ask us to restrict the use of your personal information while we are considering your request.
- Where our processing of your personal information is based on your consent, you have the right to withdraw it at any time. Please contact us if you wish to do so.

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- You may have a right to obtain the personal information that you have given us in a format that be easily re-used and to ask us to pass this personal information on in the same format to other organisations. Please contact us to find out if this right applies to you.
- You have the right to lodge a complaint to the Information Commissioners’ Office if you believe that we have not complied with the requirements of the DPA 2018 with regard to your personal data.

5 Identity and contact details of controller and data protection officer

Goleudy is the controller of data for the purposes of the DPA 2018.

If you have any concerns as to how your data is processed, or wish to exercise your rights over your data, you can contact:

Email: dpo@goleudy.org

or you can write to:

Data Protection Lead
Goleudy Housing and Support Limited
The Customs House
Cambrian Place
Swansea SA1 1RG

6 Record of Revisions

Record Number	Date	Revision Details
1	August 2024	V5 update – add section 2 Information we collect, section 3 para 4 amended to refer to payroll support and electronic personnel files; section 3 outsourced activities updated to include risk assessment software; client personal data retention amended from 3 years to as long as contract requires.