



Privacy Notice:  
Applicant, Employee, Volunteer &  
Relief Worker



# **Key Housing Association Limited**

## **Privacy Notice – Applicant, Employee, Volunteer and Relief Worker**

### **(How we process your personal information)**

This notice explains what information we collect when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner.

### **Introduction**

The purpose of this privacy notice is to explain to you the reasons which we may hold and use your personal data and explain your rights under the current data protection laws. As an employer or contractor, we may collect and process personal data relating to you to manage a contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. This notice does not form part of any contract of employment or engagement with us. It applies to all our employees, workers, volunteers, and consultants, including applicants, regardless of length of service, and may be amended at any time. If any amendments are required in the future, we will notify you as is appropriate.

### **Who are we?**

Key Housing Association is a Scottish Charity. We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5659071.

Our Registered Office is at The Square, 70 Renton Street, Glasgow, G4 0HT. Key takes the issue of security and data protection very seriously. We comply with all relevant data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations.

We are notified as a Data Controller with the Office of the Information Commissioner under registration numbers Z5659071 and we are the data controller of any personal data that you provide to us.

Operationally, employee data protection matters are led by the Head of HR for Key Housing Association and our overall Data Protection Manager is the Director of People and Organisational Development. Our Data Protection Officer (DPO) is provided by RGDP LLP, who can be contacted either by phone on 0131 222 3239 or by email: [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Any questions relating to this notice and our privacy practices should be sent to the following email addresses: [dataprotection@key.org.uk](mailto:dataprotection@key.org.uk) or [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Alternatively, you can contact us by writing to us at our Registered Office.

## **If you do not wish to provide your personal data**

You have obligations under your contract to provide us with necessary personal data, as may be required from time to time.

If you do not provide necessary personal information, this may prevent our ability to enter into a contract with you.

## **Where does your personal information come from?**

We may collect information in several ways which include:

- Personal data which you have provided to us
- Recruitment processes including information obtained from agencies.
- Your identification documents you have given us
- Background checks conditional for your engagement with us (if relevant) PVG/Disclosure/DVLA checks relating to criminal convictions/offences
- Former employers or other individuals whom you have given us permission to contact to provide us with a reference
- Medical professionals provide us with appropriate health information in order that we can manage any health- related situations that may have an impact on your ability to work with us
- Membership with professional bodies that confirm membership
- Qualifications/training bodies that provide us information relating to you
- Web browsing history and email exchanges can be routinely monitored for the purposes of maintaining the IT infrastructure
- HMRC.

## **What Information do we collect?**

The organisation controls and processes a range of information about you. In this privacy notice 'your personal information' means your personal data i.e. information about you from which you can be identified. Your 'personal information' does not include data where your identity has been removed (anonymous data). It is really important that the personal information that we hold and process about you is accurate and up to date. Please keep us informed if your personal information changes during your engagement with us.

This includes:

- Your name, address, and contact details including email address and telephone number, date of birth, gender, and signature
- The terms and conditions of your employment or engagement with us
- Details of your qualifications, skills, experience and work history, including start and end dates with previous employers and workplaces
- Information about your remuneration, including entitlement to benefits such as, pay, pension and holidays
- Details of your bank account and national insurance number
- Information about your marital status, next of kin, dependants, and emergency contacts
- Information about your nationality and entitlement to work in the UK
- Information about any criminal convictions if relevant for your job
- Details of your work pattern (days of work and working hours), schedule/rota and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- Assessments of your performance, including appraisals, any supervision notes, performance reviews and ratings, performance improvement plans and related correspondence
- Training records
- Information about medical or health conditions, including if you have a disability for which the organisation needs to make reasonable adjustments
- Equal opportunities monitoring information including protected characteristics as defined within the Equalities Act 2010, should you choose to provide this.

The data we hold about you will be kept in your personnel file which is stored securely and access to the files is restricted, in the Organisation's HR management system and other electronic/ICT systems as necessary. The information will only be held for the periods outlined in our Retention Policy.

## What are the legal bases for us processing your personal data?

We will only process your personal data on one or more of the following legal bases:

- Contract
- Consent
- Our legitimate interests, which includes the recording of CCTV Imagery, tendering processes and maintaining our Disaster Recovery Plan
- Vital interests
- The performance of a task carried out in the public interest and/or with official authority
- Legal obligation.

## Processing special category personal data

Special categories of information means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

The "special categories" of sensitive personal information referred to above require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information, including, but not limited to, in the following situations:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations
- Where it is needed in the public interest
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

## Where do we keep your data?

Your information will only be processed within the UK except where international transfers are authorised by law.

## How do we keep your data safe?

When you give us information, we take steps to make sure that your personal information is kept secure and safe. All personal data is processed in accordance with our protection policies and procedures. Our systems are password protected and all electronic data is stored securely. All paper files are kept in locked cabinets.

## How long do we keep your data?

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law and in accordance with our Data Retention Policy and Schedule.

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## Your rights

You have the right at any time to request to exercise your data subjects' rights in relation to the following:

- The right to be informed
- The right to access
- The right to rectification
- The right to object to processing
- Rights in relation to automated decision making and profiling
- The right to be forgotten
- The right to data portability
- The rights to restrict processing.

## Who might my data be shared with, or seen by?

We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, suppliers or subcontractors and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation. We may also disclose your personal data:

- With your consent
- To the extent that we are required to do so by law
- To protect the rights, property and safety of us, our customers, users of our website and other persons
- In connection with any ongoing or prospective proceedings
- If we are investigating a complaint, information may be disclosed to solicitors, independent investigators, including auditors, the Scottish Housing Regulator and other regulatory bodies, whether investigating the complaint or otherwise
- To the purchaser (or prospective purchaser) of any business or asset that we are, or are contemplating, selling;
- To another organisation if we enter into a joint venture or merge with another organisation.

## Queries and Complaints

Any questions relating to this notice and our privacy practices should be directed, in the first instance, to [dataprotection@key.org.uk](mailto:dataprotection@key.org.uk) or by post to:

Key Housing Association  
The Square  
70 Renton Street  
Glasgow  
G4 0HT

Please mark your email or letter for the attention of the Director of People and Organisational Development/Data Protection Manager who will respond to your request and make every effort to, answer your queries or resolve any concerns you have.

Alternatively, you can contact our Data Protection Officer, who is provided by RGDP LLP and can be contacted either via 0131 222 3239 or [info@rgdp.co.uk](mailto:info@rgdp.co.uk)

Please also copy us in at: [dataprotection@key.org.uk](mailto:dataprotection@key.org.uk)

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Telephone: 0303 123 1113  
Online: [Make a complaint | ICO](#)

This Privacy Notice was last updated on 1 June 2025.