



Circle Voluntary Housing Association

Staff Data Protection Notice

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1. Our Values

The actions we take underpin our vision to make a difference by providing quality homes for people in housing need. At Circle Voluntary Housing Association, we firmly believe that how we interact with our customers, communities, colleagues, and key stakeholders is of fundamental importance. Our passionate commitment to caring about our tenants and the services we deliver has led to the development of our core values - six behaviour-based principles that speak directly to the characteristics we hold high.

WE HEAR

Willingness to embody all our values in a driven manner

Empowerment of our staff and tenants

Honesty allows for complete understanding, it aids in the delivery of integrity and putting our tenants' best interests at the heart of our decision-making

Excellence reminds us of our continuous strive to be better

Accountability benefits all, transparency will foster this, and the creation of solid and reliable documentation will ensure that this accountability is enforced

Respect is the foundation of these values, without respect for ourselves, others and the service we provide we must ask ourselves why we put so much of our valuable time into the job we do.

2. Introduction

At Circle VHA, we treat your privacy seriously. Any personal data which you provide to Circle will be treated with the highest standards of security and confidentiality, in accordance with Irish and European Data Protection legislation. This notice explains how Circle collects, uses and shares personal data relating to prospective, current and former employees, self-employed contractors and consultants, and voluntary workers (“you”). It also explains your rights under data protection law in relation to our processing of your data.

3. Who we are

Throughout this Notice, “we”, “us”, “our” and “Circle” refers to Circle Voluntary Housing Association.

4. How we collect your personal data

We collect personal data from you primarily during the application, recruitment, and appointment process, supplemented by information generated in the course of your employment. It will be used by us only in accordance with the purposes outlined in this notice.

We may sometimes collect personal data about you from third parties including (but not limited to):

- references from former employers, colleagues, or other relevant parties.
- information requested from external sources to assist in the consideration of promotion.
- validation of qualifications from awarding institutions.
- taxation information from Revenue.
- information regarding related payroll contributions or benefits from the Department of Social Welfare.
- confirmation of fitness for work from nominated Occupational Health Providers.

5. Personal data provided by you about others.

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to us as your listed next of kin/emergency contact.

6. How we use your personal data

Your personal data will be used for various legal and practical purposes, without which we would be unable to employ you. It enables us to maintain a full staff record and manage the entire

employee lifecycle. Holding your personal data enables us to meet various statutory obligations over the course of your employment and to manage relevant payments associated with your employment.

Depending on your role, we may process your personal data for the following purposes:

- managing human resources processes such as recruitment and selection, payment of wages/salaries, statutory and other deductions, pension scheme membership, performance management, training, and development.
- providing facilities such as car parking, IT services, cycle-to-work scheme, TaxSaver scheme.
- to manage insurance/personal accident claims.
- monitoring equal opportunities and to comply with other statutory reporting requirements.
- to ensure that the digital services provided by Circle are performant, reliable, secure and to support appropriate IT incident resolution.
- disciplinary matters, staff disputes, employment tribunals.
- providing communications about Circle news and events.
- maintaining contact with past employees.
- provision of wellbeing and support services.
- to promote and protect equality and human rights.
- to meet health and safety obligations.
- to operate a CCTV system to protect the security of Circle property and premises.

7. The legal basis for collecting your data

Any personal data you provide to us on recruitment/appointment and during your employment will be processed fairly and lawfully.

The legal basis for processing your data will usually be:

- to fulfil the terms of your contract with Circle.
- to comply with our legal obligations e.g., employment and equality laws and statutory deductions.
- where necessary for our legitimate interests e.g., evaluating a candidate for a role.
- to protect your vital interests or those of another person e.g., where we know or have reason to believe that you may suffer harm.

8. Details of third parties with whom we share personal data

Circle will share your data with the following third parties where necessary for purposes of the processing outlined above:

- Revenue.
- Department of Public Expenditure and Reform.
- Department of Social Welfare.
- Potential employers (where you have requested us to provide a reference).

- Occupational Health Providers and medical practitioners as specified in the sick leave policy.
- Insurance brokers and providers.
- Suppliers and courier companies to provide items to you.
- Pension administrators.
- External auditors.
- Training Providers.
- Software vendors where necessary to provide technical support and software upgrades.

Where we use third parties to process personal data on our behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Other than as mentioned above, 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.

9. How long we will keep your data

In keeping with the data protection principles, we will only store your data for as long as is necessary.

10. Your rights

You have various rights under data protection law, subject to certain exemptions, in connection with our processing of your personal data, including the right:

- to find out if we use your personal data, access your personal data, and receive copies of your personal data.
- to have inaccurate/incomplete information corrected and updated.
- in certain circumstances, to have your details deleted from systems that we use to process your personal data or have the use of your personal data restricted in certain ways.
- to object to certain processing of your data by Circle.
- to exercise your right to data portability where applicable (i.e., obtain a copy of your personal data in a commonly used electronic form.
- where we have relied upon consent as a lawful basis for processing, to withdraw your consent to the processing at any time.
- to not be subject to solely automated decision.
- to request that we stop sending you direct marketing communications.

If you wish to avail of any of these rights, please write to: IT & IG Manager at dp@circlevha.ie

11. Questions or Complaints

If you have any queries in relation to the personal data processed by Circle, contact the Human Resources Manager in the first instance.



If you have any queries or complaints in connection with our processing of your personal data, you can contact Circle's IT & IG Manager at dp@circlevha.ie

You also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the Data Protection Commission's website, or by telephoning 1890 252 231.

12. Staff Declaration

I confirm that I have read and understood the Staff Privacy Notice.

Staff Name:

Role:

Date: