



Employee Privacy Notice

All personal information about you will be under the control of Anchor Hanover Group (**Anchor**) acting as Data Controller and will be processed in line with applicable UK data protection legislation including, but not limited to, the General Data Protection Regulation (EU) 2016/679 (**GDPR**) and the Data Protection Act 2018 (the **DPA**). Anchor is registered with the Information Commissioner's Office (**ICO**) and our registration number is Z7000835.

This document tells you about the sort of personal information we collect and how it will be used by us.

Who does the privacy notice apply to?

This privacy notice applies to all applicants, employees on permanent, temporary, or fixed term contracts including bank staff; workers, contractors; agents; representatives and volunteers acting for or on behalf of Anchor.

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What is personal information?

Personal information is information about someone which allows that person to be identified. Examples of personal information that we hold about you include:

- Your name and address
- Date of birth
- Your bank details
- Details of your salary and benefits
- Next of kin and emergency contact details
- Your photograph
- Information about your entitlement to work in the UK
- Details about periods of absence
- Disciplinary or grievance records
- Performance details
- Training and development you have undertaken
- Whether or not you have a disability for which we need to make reasonable adjustments
- Equal opportunities monitoring to offer equal opportunities, prevent discrimination and support under-represented groups
- CCTV data

Some personal information is deemed to fall into special categories of personal data. The special categories of data that we hold will be information about your race or ethnic origin, physical or mental health condition, alleged or real offences, proceedings for any alleged or real offence, trade union membership, sexuality, religion, or beliefs. We will also hold covid vaccination including booster vaccination or exemption certification for care home workers or where visiting a care home is necessary to fulfil a role.

How do we collect your personal information?

- Directly from you.
- From an employment agency.
- From your employer if you are a secondee.
- From referees, either external or internal.

- From the NHS.
- From the Disclosure Barring Service (DBS).
- From Occupational Health and other health care providers.
- From Pension administrators and other government departments, for example tax details from HMRC.
- From providers of staff benefits.
- CCTV images taken using our own CCTV systems.

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, faxes, online application forms, questionnaires, and text messages.

How do we use your personal information?

We will use your information to help us manage your application and employment with us. The information we use is stored within an employee database held by or on behalf of Anchor, and stored in automated tools such as purchasing systems, expenses systems and HR self-service systems.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it may affect your application and continuing employment if you don't. We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

Details of what information we collect, and store can be found in [Appendix A for Applicants](#) (page 8) and [Appendix B for Employees](#) (page 9).

The purpose and lawful basis for processing applicant information

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010, the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

Special Category Data

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA 2018 which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely to process this data are Article 6(1)(e) for the performance of our public task. In addition, we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a).

Purpose and lawful basis for processing employee information

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.

- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise, or defence of legal claims.
- Article 9(2)(j) for archiving purposes in the public interest.

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

More information about your individual rights are detailed in [Your rights as a data subject](#) (page 5)

Who do we share information with?

There may be times when we share information about you with colleagues or other organisations. These include trusted data controllers or processors who process data on our behalf.

The information we share with others will be the minimum necessary to enable them to carry out their task. Special categories of personal data are confidential and will only be made available to those who require it. The organisations with whom information is shared may include:

- information technology systems companies to provide and support our IT infrastructure and resolve any IT issues;
- the DBS to check your details with them;
- providers of goods or services and other professional advisers who provide support in various aspects of our business related to your employment such as our HR and payroll system. The access that these service providers have to your personal data will be restricted in accordance with our agreement with them;
- Government departments, regulators, local authorities, and other organisations, to research and understand how social care is delivered and by whom;
- If we are required to do so by law or in connection with legal proceedings; and
- to protect the vital interest of an individual (in a life-or-death situation).

Where will your information be stored?

Our servers are located in the UK. If your personal data is transferred outside the United Kingdom or European Economic Area (EEA) we will ensure that before we do so, there is adequate protection in place to ensure the security of your personal data.

How long is your personal data kept for?

We will only keep your personal data for as long as is necessary and will securely dispose of it after that time. For employees, we hold the personal data detailed above throughout the period of your employment.

Your personnel file will be retained for a maximum of 6 years after you have left Anchor unless it is required to be kept for a longer or shorter period by law. For applicants that have not been short listed, we retain personal information (outlined in Appendix A) for 6 months after the position is filled. For applicants that are shortlisted but unsuccessful, personal information is retained for 1 year after the position is filled. Volunteer's information is stored for 1 year once you cease to be a volunteer at Anchor.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.
- Right to judicial review: in the event that Anchor refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

Can I find out the personal data that Anchor holds about me?

Anchor at your request can confirm what information we hold about you and how it is processed. If Anchor does hold personal data about you, you can request the following information:

- The purpose and legal basis for processing;
- If the processing is based on the legitimate interests of Anchor or a third party, information about those interests;
- The categories of personal data collected, stored, and processed;
- The recipient(s) or categories of recipients that the data is/will be disclosed to;
- If we intend to transfer the personal data to a third party or international organisation, information about how we ensure this is done securely;
- How long the data will be stored;
- Information about your right to withdraw consent at any time;
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data;
- The source of personal data if it wasn't collected directly from you; and
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence, birth certificate or utility bill (within the last three months).

If you would like to exercise any of your rights or request a copy of some or all of your personal information, please either complete the Data Subject Access Request Form (available on our website or on The Bridge), or contact us by using the details below. No charge will be made for this service.

Complaints

If you wish to make a complaint about how your personal data is being processed by Anchor or any of our third parties, or how your complaint has been handled, please contact Anchor's Data Protection Officer on the details provided below.

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on 0303 123 1113 or through the website www.ico.org.uk.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Officer at Anchor Hanover Group, The Heals Building, Suites A&B, 3rd Floor, 22-24 Torrington Place, London, WC1E 7HJ
- Email us at dataprotection@anchor.org.uk
- Using the 'Contact us' section on our website
- Telephoning the Data Protection Team on **01274 026141**

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.

This privacy notice may change from time to time. Please check our website on a regular basis to read our latest version at www.anchorhanover.org.uk.

"We" "us" or "Anchor" means Anchor Hanover Group and its subsidiary and or associated organisations or members of its group.

Name: Anchor Hanover Group, Registered Office:
The Heal's Building, Suites A&B, 3rd Floor, 22-24
Torrington Place, London, WC1E 7HJ.

Registration: A charitable housing association
registered as a society under the Co-operative
and Community Benefit Societies Act 2014, No.
7843 and registered with the Regulator of Social
Housing, No. LH4095.

Appendix A – Applicant Data

| What data we collect | What we do with it |
|---|--|
| Name, address, and contact details, including email address and telephone number. | To correspond with you. |
| Details of your qualifications, skills, experience and employment history, including start and end dates, performance, attendance, conduct, training record, disciplinary and grievance information with previous employers and with Anchor | To assess your suitability for employment and to request references should we decide to make you an offer. |
| | To keep records of our hiring process |
| Passport, national insurance details, images and other evidence of identity | Confirmation of your identity |
| Information about your nationality and entitlement to work in the UK | To check your right to work in the UK and enter into a contract with you |
| For certain positions - DBS (Disclosure Barring Service) details | To ensure the suitability of individuals for certain positions |
| For positions where you are required to work in a care home or visit care homes as part of your role – details of your Covid vaccination or exemption status | To meet government and regulatory requirements |
| Records, emails, correspondence and other communication you created or updated in relation to your application for employment at Anchor. | Share with relevant third parties for the purposes of references, verification, and fraud prevention |
| Information about your criminal record (where this is a requirement of the role or relates to unspent convictions) | To ensure you are permitted to undertake the role in question. |
| For positions where you are required to drive – details of your driving licence, motoring convictions, vehicle insurance | To ensure you have the legal capacity for a role that involves driving at work |
| Details of your car/vehicle ownership and registration | To ensure you have the capacity for a role that involves driving at work |
| | To process expenses claims |
| | For parking control and monitoring parking at Anchor locations |
| Information about medical or health conditions, including whether you have a disability for which Anchor needs to make reasonable adjustments under the Equality Act 2010 | To ensure that reasonable accommodation can be made for interview and for the role in question. |
| Equality and diversity monitoring information, including your ethnic origin and date of birth. | For the purposes of equal opportunities monitoring to ensure we are being fair in our employment practices |
| Voice recordings of phone calls | Monitor service quality, complaint resolution |

Appendix B – Employee Data

| What data we collect | What we do with it |
|---|---|
| Name, address and contact details, including email address and telephone number, date of birth and gender | To enter into and manage performance of an employment contract with you. |
| Passport, national insurance details and other evidence of identity | Confirmation of your identity |
| The terms and conditions of your employment | To meet our obligations under your employment contract. |
| Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Anchor | To enter into, and performance of an employment contract with you |
| | Assessing qualifications for a particular job or task, including decisions about promotions |
| Details of your employment history, including start and end dates, with Anchor | Provide references on request for current or former employees |
| | To identify staff who qualify for service-related benefits, long service awards and publicise long service award recipients to other Anchor colleagues. |
| Operational and training records, emails, correspondence and other communication you created or updated during your employment at Anchor. | Provide references, assessments, and appraisals |
| | Share with relevant third parties for the purposes of references, verification, and fraud prevention |
| Information about your remuneration, including entitlement to benefits such as pensions, life assurance cover | To pay you in accordance with your employment contract, deduct tax and to administer pension entitlements |
| Details of your bank account and national insurance number | To pay you in accordance with your employment contract and ensure we are complying with our legal obligations |
| Information about your marital status, next of kin, dependants, and emergency contacts | Maintain accurate and up-to-date employment records and contact details. Contact you/and or your named emergency contact(s) in the event of an emergency. |
| Your photograph or digital image | Marketing, verification of identity, security and fraud prevention. |
| Your Anchor work contact details | Routine correspondence and contact related to your employment at Anchor. |
| Information about your nationality and entitlement to work in the UK | To check your right to work in the UK and enter into a contract with you |
| Information about your criminal record (where this is a requirement of the role or relates to unspent convictions) | To ensure you are permitted to undertake the role or training in question |

| What data we collect | What we do with it |
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| For positions where you are required to drive – details of your driving licence, motoring convictions, vehicle ownership and insurance | To ensure you have the legal capacity for a role that involves driving at work |
| Details of your car/vehicle ownership and registration | To ensure you have the capacity for a role that involves driving at work |
| | To process expenses claims |
| | For parking control and monitoring parking at Anchor locations |
| Details of your work pattern (days of work and working hours) and attendance at work | Maintain accurate and up-to-date employment records and to enable you to take periods of leave to which you are entitled |
| For positions on an hourly rate - Details of actual working hours | To ensure you receive accurate remuneration for hours worked |
| Details of periods of leave taken by you, including holiday and career breaks and the reasons for the leave | To enable you to take periods of leave to which you are entitled |
| Details of periods of family leave taken by you and the reasons for the leave | Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Anchor complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled |
| Details of periods of sickness absence | Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled. Ascertaining your fitness to work. |
| Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence. Gathering evidence for possible grievance or disciplinary hearings | Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace |
| Information necessary to manage legal disputes | Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work |

| What data we collect | What we do with it |
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| Assessments of your performance, including PDRs, 1:1 meetings, performance reviews, training you have participated in, performance improvement plans and related correspondence | Operate and keep a record of employee performance and related processes, to plan for career development, and for organisational continuity/succession planning and workforce management purposes |
| Information about medical or health conditions, including whether you have a disability for which Anchor needs to make reasonable adjustments | Obtain occupational health advice, to ensure that we comply with our duties in relation to individuals with disabilities, meet our obligations under health and safety law, ensure that employees are receiving the pay or other benefits to which they are entitled, ascertaining your fitness to work |
| Equality and diversity monitoring information, including your ethnic origin, sexual orientation, health and religion or belief. | For the purposes of equal opportunities monitoring to ensure we are being fair in our employment practices |
| Security information such as CCTV footage, key card information and car park entry systems | Service monitoring, confirmation of work attendance, evidence for insurance claims and crime prevention and investigation |
| Voice recordings of phone calls | Monitor service quality, complaint resolution |
| Information about your use of our information and communications systems (such as emails, calls, correspondence and other communications). | To perform our employment contract with you, manage performance, monitor confidentiality and data protection compliance, ensure compliance with our IT policies, and manage network and information security, including preventing unauthorised access to our computer and electronic communications systems and prevent malicious software distribution. |
| For positions where you are required to work in a care home or visit care homes as part of your role – details of your Covid vaccination (including booster vaccination) or exemption status | To meet government and regulatory requirements |
| ASB (Anti-Social Behaviour) or Safeguarding Concerns | To comply with regulatory requirements |
| Use of our information and communication systems. | To ensure compliance with IT policies. |
| | To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems |

| What data we collect | What we do with it |
|--|--|
| Anonymised data about your employment for analytical purposes | <p>To conduct data analytics studies to review and better understand employee retention and attrition rates</p> <p>Business management and planning, including accounting and auditing</p> |
| Information required under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) | To ensure compliance with our obligations on a TUPE transfer |
| Details of any whistleblowing complaints and investigations | Operate and keep a record of whistleblowing complaints and investigations to ensure acceptable conduct in the workplace and the safety of colleagues, residents and customers |
| Witness statements or investigation notes/minutes | For use in disciplinary, grievance or whistleblowing or other internal investigatory processes. |