

Privacy Statement

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What is Data Protection and the GDPR?

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 provides directions for processing personal information. These Data Protection legislations apply to personal information we might hold about you on some paper files and on the systems that we use. The Co-operative has a duty to ensure that the personal information we record and use is handled properly. For that reason, we are required to ensure that your personal information is:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate and up-to-date.
- Not kept for longer than is necessary.
- Processed in line with your rights.
- Secure.
- Not transferred to other countries without adequate protection.

The Information Commissioner's Office (ICO) is responsible for regulating, enforcing and promoting good practice and transparency of organisations. Windsor Albion Co-operative is registered with the ICO to demonstrate compliance with the GDPR and provide assurance that we use our customer & employee information appropriately.

This privacy statement tells you what to expect when Windsor Albion Co-operative processes your personal information. It applies to information about housing applicants, residents and other service users. This is the main privacy statement for Windsor Albion Housing Co-operative. However, some of our services may have additional privacy notices which will be provided to you when you engage or register for such a service.

The information we collect from you and how we use it

Windsor Albion Housing Co-operative needs to process personal data in order to deliver our services to you:

- To provide and manage affordable housing.
- To provide property management & property maintenance services.
- In the provision and management of care and support services.

- To deliver on our vision to create:
 - a. a secure and friendly place to live.
 - b. equality for all our tenants.
 - c. An atmosphere where tenants feel part of the community and to be able to look after each other without fear of prejudice or discrimination.
 - d. openness, honesty and fairness in our policies and that are developed with integrity and sincerity.
 - e. A duty of care to our tenants, their families and our local community.

Most information we hold will be collected directly from you, however, we may also obtain this from third parties such as the local authority, your doctor (or other health professional), a previous landlord or other relevant community partner.

Occasionally we may collect personal information which includes details about your ethnicity, religion, sexual orientation and any medical conditions. We understand that you may not feel comfortable answering some of these questions and consider them to be private. We ask these questions to make sure that we do not discriminate against any of our residents and because we recognise that a person's age, disability, ethnic origin, religion, sexual orientation or medical condition may affect their choice of home, the area they want to live, and the services they need.

Understanding the diversity of our residents is very important to us and helps us work towards providing homes and services that meet everyone's current and changing needs. If you feel uncomfortable providing this information, you can refuse.

How we store and protect your personal information

Information is held in paper files and on our computer systems. All our files and computer systems have restricted access, which means that only the employees who need to see that type of information can see it. We will apply appropriate technical and organisational measures to ensure your personal information is secure.

To help us ensure confidentiality of your personal information we may ask you (and any of your representatives) security questions to confirm your identity when you call us and as may be necessary when we call you. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you (as a one-off circumstance).

How long we keep your information for and how we dispose of it

The Co-operative has a Retention Schedule for each type of personal information that we collect such as financial details and health records.

This document states how long we will keep different types of information for. The

Retention Schedule is based on legal guidance and best practice.

Once information has passed its retention deadline, it will be assessed for deletion, anonymisation or pseudonymisation. Below is a brief description of all three eventualities:

- Deletion – The information will be deleted from all systems and paper copies will be destroyed. This information is not retrievable after deletion.
- Anonymisation – All identifiable information will be removed; however, some factual information may remain on our systems. For example, all your personal information may be removed from the record, but our records will show that a tenancy was held at a specific property from x date to y date.
- Pseudonymisation – Some identifiable information will be replaced with a unique serial code. For example, your name may be removed from the address history, but our records will show 123456 held a tenancy at a specific property from x date to y date.

Who we share your information with and why

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information we will comply with all aspects of data protection legislation.

Where the information is of a sensitive nature, for example about your health, we will generally obtain consent from you prior to sharing this information, unless we are required or permitted to share this by law.

An example of the organisations we share information with are demonstrated below:

- Irwell Valley Housing Association or Salix Homes to support their or our legal responsibilities;
- Our contractors to facilitate repairs, maintenance or improvement works;
- Local authority teams such as social services, environmental health and benefit agencies;
- Utility companies (and their representatives) and Council Tax Departments to ensure billing details are correct;
- Third parties providing services on our behalf. For example, a mailing company distributing our newsletter; a research company carrying out a tenant satisfaction survey;
- Agencies committed to protecting public funds and/or preventing fraud in line with the National Fraud Initiative;

- Police and other relevant authorities (e.g. Department of Work & Pensions, Probation Service, HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty;

We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm.

We will aim to obtain a Data Sharing / Processing Agreement with every organisation we share information with. The Agreement makes clear to the other organisation:

- how they are to use the information;
- who can have access to it;
- how long they can keep the information for;
- how to dispose of the information;
- what security measures they must have in place;
- what process to follow if a customer makes an Individual Rights request;
- what process to follow in the event of a data breach.

Each Data Sharing/Processing Agreement is regularly reviewed and we only share information that is absolutely necessary.

What Direct Marketing we may send you

The Co-operative will use your contact details to send you information and communicate with you about all matters associated with your tenancy or other primary relationship with Windsor Albion Co-operative.

We will not send you unrelated electronic 'direct marketing' (informing you about the range of services available at the Windsor Albion Co-operative) unless you have agreed to this.

We will never sell your details to 3rd parties for their marketing purposes. You have the right to object to direct marketing at any time, and our communications will always include clear instructions on how to 'unsubscribe'.

You individual rights

Windsor Albion Co-operative is committed to upholding your rights in respect of your personal data. All rights are outlined below:

- a. The right to be informed.
- b. The right of access.
- c. The right to rectification.
- d. The right to erasure.
- e. The right to restrict processing;
- f. The right to data portability;
- g. The right to object.

- h. Rights in relation to automated decision making and profiling.

The guidance below demonstrates how Co-operative residents can exercise each of their rights.

The right to be informed

All Co-operative communications are sent out to our customers in a clear and easy to read format, through various different channels such as letters, e-mails, texts and via news articles on the website.

Through the provision of our suite of privacy notices, we will be open and transparent about how and why we use your personal information.

The right of access - Subject Access Requests

As a Windsor Albion Co-operative resident, you have a legal right to see the personal information we hold about you. This is called a Subject Access Request, for which you can apply for in writing, over the phone, via email or verbally in person to any member of staff.

Upon receipt of a request, we may ask you to confirm your identity by supplying two forms of identity or by asking security questions.

Your right to certain information may be restricted, for example, information relating to a third party, or information relating to a police investigation etc.

Whilst this service is free of charge, should your request be deemed by us to be manifestly unfounded or excessive, the Co-operative will charge a “reasonable fee” which will be based on the administrative cost of providing the requested information.

The Co-operative will endeavour to ensure that 100% of individual rights requests are complied with within one calendar month, however, excessive requests may also take longer to respond to. If this is the case, the information will be provided to you within two calendar months. Excessive requests can also be refused outline the reasons behind the refusal and inform you of your right to complain to the Information Commissioners Office (ICO).

The right to rectification

Windsor Albion Co-operative strives to ensure that our residents’ information is kept accurate and up to date, however, on rare occasions, incorrect or incomplete information may be logged onto our systems. You have the right to request that we rectify your personal data if it is inaccurate or incomplete.

The Co-operative encourages residents to keep us up to date with their contact details so that our records are accurate at all times. Should any of your details change, please do not hesitate to inform us.

The right to erasure

The right to erasure is also commonly known as “the right to be forgotten”. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason for its continued processing.

This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data. Our response will also be guided by the provisions of our retention schedule.

The right to restrict processing

You can submit a request to restrict processing of your personal information in the following circumstances:

- If you have put in a rectification request, as some of your information is inaccurate, you can also request that we do not further process the information until the necessary corrections have been made.
- In the extremely rare likelihood that your personal information has been unlawfully processed, and you do not wish for your information to be erased, you can request that we restrict further processing of the information.
- Should your information be required in relation to a legal claim, however our retention period has passed, you can request that the personal information only be used for storage purposes and not for further processing.

The right to data portability

Data portability means that you can request the Co-operative to transfer your personal information in a safe and secure way to another organisation that you hold your information with. A good example of data portability is explained below:

Should you decide to terminate your tenancy with the Co-operative and enter into a new tenancy agreement with another housing provider, with your consent, we will transfer your personal information over to the new provider including, for instance, contact details, account details, rent history and any arrears information.

The right to object

All Co-operative residents have the right to object to their personal information being processed for direct marketing and profiling purposes.

Rights relating to automated decision making and profiling

Salix Homes may use profiling for the following purposes, but is not limited to:

- To monitor for fraudulent activity.

- To offer services and provide information that we believe may be of use to our customers, based on their personal preferences and/or behaviour, for example, sending out community event leaflets, in line with the events you told us you would be interested in attending upon signing your tenancy agreement.

All Co-operative residents are able to request that we do not use your personal information for profiling activities.

Further information

All Individual Rights requests will be actioned within one calendar month and responded to in the same format in which the request was received, for example, if we receive your request electronically, you will receive your information electronically.

If a request is deemed to be unfounded or excessive, an additional two month extension could be applied. In the event of an extension, the Co-operative will contact the resident making the request, informing them of why the deadline to respond to their request has been extended. It is possible that excessive requests will result in the application of an appropriate fee.

Individual Rights requests can be refused on the following grounds:

- To exercise the right of freedom of expression and information.
- To comply with legal obligation in relation to public interest or official authority.
- For public health purposes in the public interest.
- Archiving in the public interest, scientific research, historical research or statistical purposes.
- In defence of legal claims.

What do I do if I am dissatisfied following an Individual Rights Request?

If you are dissatisfied, you can submit a complaint through the Windsor Albion formal complaints process. All complaints regarding Individual Rights requests will be responded to within 21 calendar days, in line with the provisions of the GDPR.

You can also raise your concerns with the Information Commissioners Office (ICO), who will consider if Salix Homes have broken any of the Data Protection principles and if we are processing information in accordance with the GDPR.

You can contact the ICO by calling 0303 123 1113, or writing to:

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

You can find out more information online at www.ico.org.uk.

Website Terms and Conditions

Our website uses a contact form on our 'Contact Us' page.

It collects the following data as part of the enquiry from the user:

- Name
- Address
- Telephone Number
- Email address

Once processed by us the data is not stored and is deleted immediately.

In the event that video filming is uploaded onto our website we will use all reasonable endeavours to ensure appropriate permission is sought and filed before public display.

We have a Legal Cookie warning notice. However, we do not obtain any user personal data arising from this process.