

GDPR Document

Privacy Notice

Date authorised	22 May 2018
Review date	22 May 2021

Privacy Notice

The statement below is for posting on the Rosebery website and other communications as and when appropriate.

Our commitment to your privacy

There are some changes in data protection law so we wanted you to know that we've updated our **Privacy Notice**.

Your trust is important to us and we want to make sure you fully understand what these changes mean for you.

If you would like to find out more, [take a look at our Privacy Notice](http://www.rosebery.org.uk) which is posted on our website at www.rosebery.org.uk

Who we are

Rosebery Housing Association Limited is a registered provider of social housing and is registered with the Information Commissioner's Office as a Data Controller under the General Data Protection Regulation (GDPR). Rosebery Housing Association Limited is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014. Registered No. IP27671R. Registered Provider LH4026. Registered office: Newplan House, 41 East Street, Epsom, Surrey KT17 1BL.

This **Privacy Notice** is a public document available to everyone and applies to all residents, contractors and stakeholders of Rosebery Housing Association (Rosebery). It explains what personal information we hold about you and how we use any personal information we collect, when you use any of our services or when you visit our website. It explains how Rosebery collects and processes personal information. We will only use your data for legitimate purposes and for

the purposes that we have told you about in advance. Privacy is important to us, and we are committed to protecting and ensuring your data remains safe at all times, in accordance with our legal obligations. Privacy laws govern the way in which we process your information as well as the rights you have to the information we hold about you.

What information do we collect about you?

We hold personal data such as your household's names, dates of birth, contact details and records of any transactions such as payments or requests for information as well as special categories of personal data such as gender, ethnicity, religion or other beliefs, disabilities, vulnerabilities, sexual orientation, and medical history.

We only use special categories of personal data so that we can understand you and your needs better and can tailor our service to you. We may also use this information for the safeguarding of staff. In some circumstances we will need to collect additional information about you to enable us to tailor our services, without this we may be unable to meet your housing and support needs.

When do we collect information about you?

Personal data and special category data is collected and/or created when you:

- Submit a nomination to a local authority or referring partner or when you fill in an application form for housing and request one of our properties;
- Accept an offer of one of our properties;
- Request any of our services;
- Voluntarily complete our customer surveys;
- Provide feedback or make a complaint;
- Make an application for employment and become a member of staff;
- Make an application and become a Board member.

We also process personal information using CCTV systems and we monitor and collect visual images:

- For the prevention and detection of crime;
- To improve staff safety and monitoring.

We record all telephone calls made to our Contact Centre and these recordings are used to coach staff and improve the services that we provide to you.

From time to time we may also be provided with information about you from other agencies such as the housing benefit and social services departments in local authorities, the Department for Work and Pensions (DWP), the Police or the NHS.

Property information

Much of the data Rosebery uses relates to our properties and their maintenance and repair. We do not consider property information used in conjunction with the property address to be your personal information. For example, the age of the kitchen, results from building surveys, planning to replace windows or repairs to a tap are not considered to be personal information. We are happy, wherever we can, to provide you with answers to questions you may have about the property you are living in and work done to it.

As soon as your name, contact details or other personal information is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information

Additional services

Rosebery conducts a number of additional voluntary services including help with organising community events, adapting the property you live in and gathering information to improve our services. For these voluntary services, where your personal information is needed, we will always notify you about the service being offered, explain the service and obtain your consent to proceed, usually by way of a sign up/consent form for that service. For the additional voluntary services, much of the information contained in our Privacy Notice is still relevant, such as details about Rosebery as the data controller and the rights you have under the legislation, including the right to withdraw your consent and the right to complain.

How we will use the information about you

We use your personal information to manage your tenancy. We recommend you read your tenancy agreement in conjunction with this Privacy Notice. We use the information we collect in order to fulfil our obligations in order to:

- Provide a service to you more effectively;
- Keep in touch, understand your needs and be able to invite you to events;
- Tell you about changes to Rosebery Housing Association;
- Meet your housing management needs and requirements;
- Provide additional services at your request, including resident involvement initiatives and every day support services;
- Manage payments from you, to you and for accounting purposes including debt collection;
- Tackle anti-social behaviour;
- Ensure Rosebery colleagues and customers security and health and safety;
- Deliver quality management;
- Meet our local obligations;
- Resolve complaints and queries;
- Participate in initiatives to assist in the prevention of financial and social exclusion.

Sharing your information

We may sometimes need to share the personal information we process with other organisations where it is necessary to fulfil a contract, or where we need to ensure that you are being paid the correct amount of benefit entitlement such as with the DWP or housing benefits departments, or where we are legally required to do so. Where this is necessary, we are required to comply with all aspects of the GDPR. Below is a list of those we may share your information with:

- Your council or benefits office relating to your housing;
- Police, welfare or support organisations, dealing with you including information provided by NHS or Adult Social Care professionals with your agreement;
- Councillors, MPs or other representatives acting on your behalf/instruction;
- Family members (next of kin or others with power of attorney);
- Our staff, contractors and suppliers who provide services to you, or who provide services on our behalf, such as housing contractors who undertake repairs or improvements to your home or research companies who conduct surveys for us;
- Banks, for example to carry out payments through a secure system;
- Companies that help us mail out leaflets/newsletters;
- Our solicitors;
- Our insurers, in case of public liability claims and similar;
- Credit reference agencies;
- Utility companies;
- Debt collection agencies acting for others and on our behalf to collect former debt.

Rosebery ensures it has the compliant data sharing agreements in place to support this process.

In some cases, we may have a duty to disclose your information by law to:

- Other housing associations;
- Local authorities, regulators and government departments;
- Police, fire services, health authorities or medical staff;
- Others who may need information from us for their own purposes, for example detecting and preventing crime, prosecuting offenders and for the prevention and detection of fraud.

We do not provide organisations with access to your information in return for payment for their marketing or commercial purposes. However, at times we may be obliged to disclose your information by law to a regulator with appropriate powers (for example the Homes and Communities Agency), or following a court order.

We will not share your personal information with anyone who claims to represent you, unless we are satisfied that you have appointed them or they act in some recognised official capacity. We will take necessary steps to confirm the callers' identity or check that we have your consent to deal with them on your behalf.

How we will communicate with you

Rosebery needs to communicate with tenants and this will usually be in writing, telephone or verbally during tenant meetings. Our tenants have access to our newsletters and annual reports with information about what is going on within the organisation. We are required by our regulator to keep our tenants informed and to offer opportunities for involvement. We will only discuss or communicate your tenancy with those named on the agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently in writing.

Transferring information overseas

We do not transfer any personal information outside of the European Economic Area (EEA) without first ensuring suitable safeguards are in place.

How long do we store information?

Any information we collect is stored using guidance issued by the National Housing Federation. Full details of this are included in our Retention Policy which is available on request.

Your rights to access data

You have a legal right to access information we hold about you, including the right to:

- be informed about how we process your personal information – this is why we have developed this Privacy Notice;
- access a copy of the personal information we collect and keep on you – known as a subject access request;
- have inaccurate or incomplete personal information rectified;
- restrict the processing of your personal data in certain circumstances, for example when you have challenged the accuracy or you object to the processing;
- object to processing for direct marketing or for Rosebery's legitimate interests or performance of a task in the public interest, or for the purposes of scientific/historical research and statistics;
- have your personal information erased in certain circumstances where there is no compelling reason for Rosebery to continue processing it;
- receive a copy of your personal information in a machine-readable format, this right allows you to move, copy or transfer information to another company, e.g. another housing association, data portability;

- object to automated decision making that would affect you significantly, in certain circumstances;
- at any time, withdraw your consent for Rosebery to use or share your special category personal information where you have previously given consent.

Any requests for information must be made in writing and must also include proof of your identity.

Your rights, the right to complain and the ICO

You also have other rights:

- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object in relation to automated decision making and profiling

You have the right to complain about any matter relating to our service, including how we use your personal data:

- In the first instance please contact our office (see contact details below).
- If you are still not happy with our service you may complain to the Housing Ombudsman Service at <http://www.housing-ombudsman.org.uk>
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk>

GDPR consent

You have the right to withdraw consent for the use of your information at any time where consent is the lawful basis for processing. However, this may affect the service that we are able to provide to you, for example we need to have access to information you provide in respect of any housing application in order to ensure our compliance with the Allocations Policy and to ensure that we provide you with a property that is suitable for your needs.

If you believe that the information we hold on you is incorrect, then you should notify us and we will arrange to have the information corrected within one month of you telling us. We will also tell anyone else who we have provided the incorrect information to. You also have an additional right to obtain a copy of any information you have provided to us.

What else we do with the data

Rosebery regularly conducts surveys and some relate to our services in order to gauge satisfaction levels, make improvements based on feedback and evaluate

our performance against other benchmarks. Wherever possible, statistical information is anonymised or pseudonymised.

We use the data you give us to meet our obligations as a Registered Provider of Social Housing. For example, we may:

- Use aggregated data to ensure the services we provide are equally accessible to all members of the community;
- Contact you to make sure that we comply with statutory or regulatory requirements;
- Get in touch to gather your views about proposed changes to the service we offer.

Rosebery operates a range of information and communications systems and technologies for the efficient operation of our business. Personal information is stored and managed within those systems, which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you. You can get in touch with us via the channels below:

Website: www.rosebery.org.uk
Email: dataprotect@rosebery.co.uk
Letter: Newplan House, 41 East Street, Epsom, Surrey KT17 1BL
Phone: 01372 814 000

Changes to our Privacy Notice

Our Privacy Notice is regularly kept up to date. The latest version is always available on our website at www.rosebery.org.uk