

Privacy Notice

The privacy of your information is important to us at Harrison Housing and we are committed to handling your information securely, respectfully and in line with data protection law. This notice is in place to inform you about what to expect when Harrison Housing processes the personal data we collect when you become one of our residents, or each time you contact us.

Personal data is any information that relates to an individual who can be identified from that information. 'Processing' includes the collection, storage, use, disclosure or destruction of personal data.

Where we refer to 'we', 'us' or 'our' in this policy, this refers to Harrison Housing. This privacy notice applies to Harrison Housing, and contractors acting on its behalf.

For further information, please contact our Data Protection Officer at the following address:

The Data Protection Officer

Harrison Housing
46 St. James' Gardens
London
W11 4RQ

Or email, for the attention of the Data Protection Office, to:
info@harrisonhousing.org.uk

The information we collect

Harrison Housing will endeavour to only collect the personal information we need from you and about you. The type of information we collect will vary depending on the services we offer to you and our contractual relationship.

The majority of data we hold will be collected directly from you, but we may also obtain information from another person or organisation

if you have given permission for them to share it with us. This could include central government, local authorities, your previous landlord, your doctor, or other health professionals.

Types of information we collect

Personal data – This is any information that can be used to identify you, for example, your name, address, date of birth, NI number, email/postal address, telephone number, credit/debit card and bank details, as well as information relating to your health or personal circumstances.

Special categories of personal data – This is sensitive personal information, for example your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, health information, political opinions and so on. Harrison Housing would only collect your sensitive personal information where there is a clear need for us to do so, such as to assess what services are relevant to you or to offer appropriate support to you.

Criminal offence data – Harrison Housing will collect and use information about criminal convictions and offences for the purposes of managing anti-social behaviour, monitoring fraud and to protect the health and safety of employees or residents.

Why we collect your data and how it is used

Harrison Housing has a “legitimate interest” in holding and processing your personal data in order to deliver services to you and others in your household and to properly manage our business.

In some circumstances we might hold your information for other reasons – for instance because we are under a legal obligation to hold certain information or because holding the data is necessary for the purposes of a contract we have with you, such as your licence agreement. When we ask you for information, we will state clearly why we need it. We use the personal data we collect in various areas of work, including:

Assessing and processing housing applications, service eligibility and completing licence sign-ups

- We will need personal data, including: your name, telephone numbers and email addresses for use by us, our contractors and partners.
- We will collect detailed personal information about you and other household members including age, sex, date of birth, gender, ethnicity, nationality, National Insurance number, income and benefits details, employment status, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, access to financial services such as banks and credit unions, bank details, medical information and details of any previous criminal behaviour.

This information is required and we will be unable to accept an application for services without it. For example, we would need to verify your identity to ensure an application is genuine. Legally we are allowed to collect and process this data. It is directly used in the performance of a contract (i.e. licence agreement) between you and us and/or is used, at your request, to enter into such a contract.

We collect and process information on all licensees living in a household, which is required as it is in our legitimate interest to know who will be living in our property, and to ensure the property offered is adequate for the needs of the household. All licensees should ensure they have read this policy.

To confirm eligibility for housing and to prevent fraud and illegal sub-letting

- We will require your proof of ID during the application process
This information is required in order for us to meet our legal obligations as we may not be able to provide services to you if we are unable to verify your identity.

Management of properties (licences)

- Your up-to-date contact details (telephone number and email address) are required so we can get in touch with you to discuss issues regarding your licence. For example, collection of WMC or service charges, receipt of benefits, essential servicing, access for maintenance and repairs, and the delivery of other services. We may need to provide your contact details and relevant associated information to our contractors who undertake work on the property on our behalf.
- We may use your contact information to inform you of changes occurring at Harrison Housing, or to investigate and resolve complaints or any other housing management issues.
- We will ask you for supporting documents to effect changes that relate to your licence, such as a copy of your marriage certificate or deed poll certificate to change your name on our records. Supporting medical evidence will also be required in order to assess any change to housing requirements as a result of a medical need.
- We will hold records of all our contact with you, your contact with us, any contact from third parties representing you, and any contact we have with third parties that is about you.
- All financial records including the amount of money you have paid us, any amount(s) outstanding and any associated recovery action will be held by us. Depending on your method of payment; we may collect your bank account details, which will be held by our Direct Debit provider.
- We may hold information about your history, for example regarding credit status or criminal/anti-social behaviour offences, if we decide this is required to help us look after our staff, business or anyone else.

This information is required for a number of reasons but primarily we will be unable to provide the services outlined in your licence agreement effectively without it. We will also not be able to contact you to arrange the provision of essential gas servicing, and other compliance checks, required to your home if we do not hold your contact details, which we have a legal obligation to have completed. Harrison Housing has a legitimate interest in keeping offence data to reduce risks to our staff and contractors.

When you engage with our additional guidance, advice and support services

- Harrison Housing may offer you support to help you maintain your licence. This could include advice to improve your financial circumstances. We may hold information about your household income and expenditure.

As an almshouse, we have a legitimate interest in processing this data to make sure that we are providing all the necessary support to ensure that licences are successfully maintained and people remain housed.

To ensure we are keeping your personal information secure

- We will use some of your personal data to confirm your identity over the telephone before divulging any information in relation to your licence with you or before discussing any other personal or confidential information. We may also use payment history information to confirm your identity.

These checks are in place to ensure that we do not reveal any of your personal or confidential information to any unauthorised third parties in accordance with data protection law.

To assist with personal security and prevention and detection of crime

- We may capture your image on our CCTV systems if you visit an estate, office or community facility which is covered by this service.

Capturing CCTV images is necessary for Harrison Housing to meet legal obligations on health and safety and crime prevention.

To understand how we're performing

- To help us monitor our performance and improve the service we provide, we may use your contact details to carry out customer

satisfaction surveys, market research and to manage and analyse complaints.

- We may record calls for training, quality and monitoring purposes when you contact us. Call recordings will be deleted once reviewed or no later than 6 months after recording.
- We may use your information for equal opportunities monitoring and research. This information is required to help us to understand how we are performing so we can achieve our service standards to you.

We have a regulatory obligation to gather information on the quality of services we provide and we also have a legitimate interest to monitor our performance so that we can ensure everyone is benefiting as best they can from the services we provide.

Keeping in touch, understanding your needs and inviting you to events

We may wish to communicate with you and keep you up to date with events and news about Harrison Housing, which we think will be of interest or use to you – this will include newsletters.

We have a legitimate interest to keep you up-to-date with news and events at Harrison Housing as well as a legal obligation to keep you informed of some changes that may occur from time to time. Our resident involvement projects rely on your consent.

For regulatory purposes in order to meet the requirements of our regulators – Regulator of Social Housing & The Charity Commission

There may also be a legal obligation for us to process the information or to demonstrate to our regulators that we are fulfilling our regulatory and statutory obligations.

Direct marketing

Harrison Housing does not currently undertake any direct marketing.

In the future, with your consent, we may use your information to send you communications about opportunities or other services that we think will be of interest to you. Our forms will have clear marketing preference questions and we include information on how you can say 'no' to receive such marketing.

If in the future Harrison Housing does engage in direct marketing, you will be able to let us know if you would prefer not to receive these communications at any time by calling us on: 020 7603 4332 or emailing us at info@harrisonhousing.org.uk.

Where do we obtain your personal information from?

We obtain your personal data from:

- You yourself, and your household members (for instance because you have provided us with that information in the course of applying for a licence);
- Central or local government (for instance because they are sending us information about your entitlement to benefits);
- Our systems and processes (for instance, if we have CCTV in a communal area where you live).

Who do we share your data with and why?

We will not disclose personal information about you to other parties except where we have a legitimate interest to do so, where you have given us your consent to disclose (if required), or where there is another lawful basis to do so under the Data Protection Act 2018

(DPA 2018). We will never rent or sell your personal information to any third parties but we may share your information with our trusted service providers who are authorised to act on our behalf, such as our maintenance contractors, or others who provide services to you such as local authority benefit departments.

We may also disclose your personal data to our insurers and/or professional advisers as necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

There may be additional situations where it is necessary for us to share some of your information with others. Where this is the case, we will only make such disclosures when they are in line with our powers or obligations under the DPA 2018 or where they are required by law. Some of the organisations that we may share personal information with include, but are not restricted to:

- Emergency services
- Government departments including local authorities
- Support agencies
- Medical professionals
- Utilities providers
- Market research companies for the purposes of conducting customer satisfaction surveys on our behalf to improve our services and to comply with regulatory requirements.

We ensure the organisations above, and any others we might share information with, understand that the personal information provided must be used for the reasons we have specified and must be kept safe and secure. Our relationships with some of these organisations are also bound by contractual data sharing agreements.

In some cases we may be legally required to provide information to one of these other organisations – for instance, in certain circumstances we may be required to provide information about housing benefits to a local authority or central government department.

We may also, sometimes, be required by law to share information with enforcement agencies, or other statutory agencies, without your consent, for the purposes of:

- Crime prevention or detection or matters of national security;
- Taxation/fraud reasons (including housing fraud).

In any other instances, your personal information will not normally be shared with any other third parties, unless it is in Harrison Housing's legitimate interests to do so or your explicit consent has been granted.

We will not normally send data overseas

Our business is based solely in the United Kingdom, and so we do not ordinarily send data overseas.

How long do we keep your data?

We hold a variety of data types, which have different requirements for how long we need to keep them. Our Data Protection and Confidentiality Policy has an Appendices detailing the retention schedule we use, which describes the types of data we hold and their retention timescales. We follow legal requirements and best practice in this area. We will securely destroy / delete personal data when we no longer need it or no longer have a legitimate interest in keeping it.

What are your rights regarding your data?

Harrison Housing is committed to respecting your rights in regards to your personal data. The DPA 2018 provides the following rights for individuals:

The right to be informed

We will be open and transparent about how and why we use your personal information. We do that as far as we can through this privacy notice, and through other documents.

The right of access

You have a right to ask to see the personal information we hold about you and ordinarily the right to have a copy provided. A request to see this information is known as a 'subject access request' ("SAR").

SARs can be made in writing to the Data Protection Officer using the contact details above, and we ask that your written request be accompanied by proof of your address and identity. If you require specific information, it is helpful if this is clear in your request, for example, information from a particular time period or about a specific correspondence.

Harrison Housing will provide the first copy of this information free of charge, but additional copies may be subject to a reasonable fee. This does not mean that we will charge for all subsequent subject access requests.

We will aim to provide you with the information you have asked for within one calendar month. The data provided to you will be a copy of the information we hold that relates to you, this will not generally include information about your property, for example, repairs logs or contractor visits, as this is unlikely to constitute your personal data.

The right to rectification

You can ask us to correct your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by informing us if your details change.

The right to erasure

In some circumstances you have the right to the erasure of your personal data. These might include if:

- The personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You withdraw consent to consent-based processing;
- The processing is for direct marketing purposes.

However, there are certain general exclusions of the right to erasure, for example where processing is necessary for compliance with a legal obligation or in connection with legal claims.

We will need to consider the circumstances of any such request and balance this against our need to continue processing the data. We may decide to override this request in certain circumstances.

The right to restrict processing

In some circumstances, you may ask us to restrict the processing of your personal data. Where processing has been restricted on this basis, we may continue to store your personal data and will observe the restrictions on processing except in the case of processing permitted by applicable law (e.g. legal claims).

The right to data portability

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

The right to object

You have the right to object to our processing your personal data on grounds relating to your particular situation, but only where the legal basis for the processing is that it is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us;
- the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is for legal claims.

You can also object to the processing of data for the purpose of direct marketing and withdraw consent at any time where it is being relied upon for processing.

Rights in relation to automated decision making and profiling

You have the right to challenge the validity of any decisions made through automated decision making (decisions made without any human input). You may also ask for your information not to be processed in this way.

Harrison Housing does not currently undertake any automated decision making or profiling.

Changes to this Privacy Notice

This Privacy Notice will be kept under review and updated as required. We recommend that you keep up to date via our website.

Information Commissioner's Office

For independent advice about data protection, privacy, e-privacy and data sharing issues, you can contact the Information Commissioner's Office:

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

Phone: 0303 123 1113
Email: casework@ico.org.uk
Website: www.ico.org.uk

Terms and conditions of using our website

You can access and browse our website without disclosing information about yourself.

We're very serious about protecting your privacy. If we ask for information about you, we take all possible steps to keep it safe.

If you choose to complete any of our online forms we will need some personal information to allow us to deal with your enquiry. This information will be used only for the purpose for which you provided it.

No personal information you've given us will be passed on to third parties for commercial purposes. We will treat any personal information you may have provided in accordance with the provisions of the DPA 2018.

In relation to the use of the site, we may process your IP address, geographical location, length of visit, page views and website navigation paths. This data is obtained through our analytics tracking system.

The legal basis for this processing is our legitimate interests, namely monitoring, analysing and improving our site.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Our website currently uses cookies for analysis and functionality purposes:

- The use and performance of the site is analysed through Google Analytics. Google Analytics gathers information about website use by means of cookies. The information gathered relating to the site is used to create reports about the use of the site. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.
- Cookies are also used to enable you to change the colour scheme and text size of the website.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. Blocking all cookies will have a negative impact upon the usability of many websites and if you block cookies, you may not be able to use all the features on our site.