

## **CESSA Housing Association & CESSAC – Tenant Privacy Notice (Full)**

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### **1. Summary**

This Privacy Notice is a public document available to anyone and applies to customers of CESSA Housing Association (CESSA HA) & CESSAC to explain how the organisation collects and processes personal information in order to conduct normal business activities as a UK charitable housing association and as a charity respectively. CESSA HA is a Registered Provider (RP) regulated by the Homes and Communities Agency (HCA No: L0104), whereas CESSAC is a Registered Charity (No: 226684) that operates housing on behalf of the Crown Naval Charity Greenwich Hospital. Normal activities can be summarised as:

1. Providing social housing.
2. Property and grounds maintenance and repair.
3. Managing your housing, tenancy/lease and account as your landlord.

We also provide additional optional services including:

4. Help with organising and assisting community events.
5. Offering opportunities to be involved (co-regulation).
6. Adaptations made to the properties we manage.
7. Additional Support for individuals identified to be in need of short-term assistance.

### **2. Who we are**

CESSA HA is the Data Controller for its tenants & CESSAC for those of Greenwich Hospital. Their head office is located at 1 Shakespeare Terrace, 126 High Street, Portsmouth PO1 2RH. Tel: 023 92829319. CESSA HA is registered with the Information Commissioner’s Office ref: Z6511835.

### **3. How we collect your information**

CESSA HA & CESSAC collect information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We operate a CCTV system at each scheme for the detection and deterrence of crime, which operates continuously and recordings are held for one month.

From time to time we may operate CCTV / sound recording and / or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. We may also take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with their consent. We may receive information about you from third parties including:

- 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 (NOK or other with power of Attorney).

#### **4. What information we collect about you**

The information we require from you, the tenant(s) includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details of next of kin and / or anyone authorised to act on your behalf if applicable.
- Basic details (name and DOB) of all household residents.
- Proof of housing eligibility (Right to Rent), any interest or equity in other property.
- Military service and dates of you or relevant relative.
- Other personal information that will vary on a case by case basis to help us to provide you with support or resolve breach of tenancy, alleged anti-social behaviour or fraud.

The information we may collect from you includes Disabilities or vulnerabilities, which we use to tailor our service to better meet your particular circumstances and needs. We may use this information for safeguarding of staff. If you do not provide this information then we may not be able to provide all our services to you, and ultimately you may not be able to hold a tenancy with us. We will also be told about payments you make to us and we may receive information from others about you, e.g. in the event of complaints or alleged breaches of your tenancy.

#### **5. What processing we do with information collected**

The information we require from you is used to manage your tenancy with CESSA HA & CESSAC. Please read your Tenancy Agreement carefully for specific details as 'performance of an Agreement' is usually the legal basis for processing your information and carrying out our activities. The processing activities we conduct can be summarised as:

- Managing your account charges and payments, including arrears.
- Managing the repairs, maintenance and adaptations of our properties.
- Managing the provision of our support service available for your use should it be required.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.

- Complying with relevant legislation and regulation. CESSA HA & CESSAC conducts research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

CESSA HA & CESSAC conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Security. CESSA HA & CESSAC operate a range of information and communications systems and technologies for efficient operation of the 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.

## **6. Additional services**

CESSA HA & CESSAC 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 CESSA HA & CESSAC as the Data Controller and the rights you have under the legislation, including the right to withdraw your consent and the right to complain.

## **7. Property information**

Much of the data we use 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 a building survey, planning to replace windows or a repair to a tap. We are usually happy 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.

## **8. How we will communicate with you**

CESSA HA & CESSAC needs to communicate with tenants and this will usually be in writing, telephone or verbally during tenant meetings. Our tenants receive our newsletter and Annual Report 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.

## **9. Who we share data with and how long we keep information**

CESSA HA & CESSAC share limited personal data with our contractors who are carrying out services on our behalf. Our contractors are required to comply with the law and our own Data Processing

Agreement to ensure data is managed appropriately and for specified purposes, including to run our out-of-hours telephone service or to complete emergency, responsive or planned repairs. If your vital interests are at stake, relevant data may be shared with the emergency services.

CESSA HA & CESSAC may need to share personal information with government departments and agencies, with our regulator and auditors, with Local Authorities, utility companies or with other organisations and agencies, including the Police, where we are legally allowed to do so.

Information relating to a tenancy will be kept for as long as the agreement is active or where money is owed on the account, and for a period not exceeding three years afterwards. The basic history of who held a tenancy at which property and when will be held forever. A full retention schedule is available from any Office.

## **10. What we will not do**

We will not send you unsolicited marketing material or sell your personal data on to third parties. We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that. We will not transfer or store your personal data outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

## **11. Your rights, the right to complain and the ICO**

You have the right to request a copy of the data we hold about you. Please contact the office if you wish to request access to any of your personal data and we will always endeavour to answer your questions as part of our friendly, helpful service. We will not normally make a charge for this service and will respond within one month of receiving your request. It will always help if you can be as specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search. You have the right to correct information that we hold. Please advise us of any changes or corrections by contacting your scheme manager.

You may withdraw your consent to use any information *that was previously provided with your consent*. Please advise us if you wish to withdraw any consent previously given to the office. You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <https://ico.org.uk/>. 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 (023 92829319).
- 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/>.

## **12. Further information**

For further information about CESSA HA & CESSAC, please see our website at [www.cessaha.co.uk](http://www.cessaha.co.uk).

## **13. Changes to our Privacy Notice**

Our Privacy Notice is regularly kept up to date and this version was updated on 12<sup>th</sup> March 2018. The latest full version is always available from our website at [www.cessaha.co.uk](http://www.cessaha.co.uk).

This notice will be amended after 25<sup>th</sup> May 2018 to remove reference to the UK DPA as it will be replaced by the UK Data Protection Bill and EU GDPR laws.