

NORTH VIEW Housing Association

Registered as a Scottish charity

At North View we hold information about you, and the people who live with you. In this paper, we tell you about the information we hold, why we hold it, who we may share it with, and how you can get access to it.

If you have any queries about what is said in this paper, please get in touch with our Data Protection Officer (DPO).

May 2018

What personal information do we hold?

The singularly most important aspect of the relationship between you (the tenant) and North View (the landlord) is the Tenancy Agreement that you signed when you became a tenant of North View Housing Association. When you signed that, you had to tell us your name (and, in the case of a joint tenancy, the name of the joint tenant), and the names and dates of birth of everyone staying with you at that address. The Tenancy Agreement is a contract between us, and as such we have a legal obligation to hold that information about you and your household. Your telephone number and email address isn't in your Tenancy Agreement, but we keep that on file so that we can get in touch with you.

Before you signed the Tenancy Agreement, you will probably have filled out a Housing Application form when you applied for one of our properties. Additional information that you will have given us on that form will include your gender, whether or not you or any member of your household is on the Sex Offenders Register, emergency contact details, your doctor's details, details of your previous landlords, your employer's details, your income and expenditure details, your National Insurance number and whether or not you are a serving member or a former member of the armed forces either as a regular or reservist. You may also have included the National Insurance numbers of others in your household who are aged 16 and over, information about your health, health professionals that you deal with, and health related welfare benefits that you receive.

When you applied to us for housing, and when you signed your Tenancy Agreement, you had the option of filling out an 'Equal Opportunities' form. If you completed the EO form, we will have the information you gave us on file. If you completed every section of the form, then we will be holding information about your ethnicity, nationality, religious beliefs, and any disability that you or a member of your household may have.

As well as you providing us with your personal information, through time, we may also get information about you from other sources. That could include social work, solicitors, the police, health professionals, elected members (local councillors, MSPs, MPs), etc.

It is important that the personal information that we hold about you is accurate and current. We will take steps to try to ensure that it is kept up to date, but we would ask you to keep us informed of any changes. All you need do is tell your Housing Officer of any changes.

What do we use this information for?

The main reason that we hold information about you is to help us provide you with the services that your Tenancy Agreement requires us to provide. We also use it to make sure that we both do what the Tenancy Agreement requires of us.

In a nutshell, we use your personal information:-

- To provide you with services as the landlord of your property.
- To manage and administer your tenancy; including processing your rent payment, carrying out repairs to your property, completing safety checks and other periodic maintenance inspections to your property, dealing with any complaints that involve you, managing and recovering rent arrears, and managing and recovering rechargeable repairs.
- To communicate with you e.g. sending you letters, Newsletters, our Annual Report etc.
- To help facilitate the adaptation of your property (where it is required on health grounds).
- To help in the completion of resident surveys (the outcome results of which we use in the review of our services).
- In the compilation of anonymous statistical returns/reports which are submitted to our Management Committee and/or the Scottish Housing Regulator.
- In the process of providing you with welfare advice and/or referring you on to other organisations that can offer you relevant services.
- To help ensure the wellbeing of tenants we believe to be vulnerable, and to ensure the safety of our staff and contractors through identifying households where their safety may be at risk through the unreasonable behaviour of a member of that household, or where the householder's pet may pose a safety risk.
- To provide a tenancy check to another landlord.

Tenants: your personal information!

What is sensitive personal information?

Some of the above information that we hold on you is known as 'sensitive personal information'. 'Sensitive personal information' is information about your race, ethnic origin, political beliefs, your religious beliefs, trade union membership, genetics, biometrics (such as your fingerprint), health issues, and your sexual orientation. We don't hold information about all of these, but we do hold information on most of them.

Why do we hold sensitive personal information, and who do we share it with?

We use a lot of the sensitive personal information to compile anonymous statistical reports on 'equalities' issues. That helps us demonstrate that we aren't discriminating against anyone (or any group) and show that we provide the same service to everyone, no matter who they are!

We convert the data from some sensitive personal information 'fields' into statistics which we then use to help us get an idea of changes to the tenant profile; that enables us to plan to meet those changes. An example of this has to do with how many tenants consider themselves, or someone in their household, to be disabled. Each year we spend a lot of money on adapting tenants' homes to make them more 'liveable' for a resident who has a medical condition. Analysing the disabled statistics gives us an idea of how many adaptations we could be doing in future. Age has got an input there too; the older tenants' get the more likely they will need some sort of adaptation – like getting a shower in instead of a bath – so we use your age information to help us plan for the future too.

Health is the sensitive personal information 'topic' that we use most. We hold information on health to evidence the awarding of housing application points, for maximising benefit entitlement, and to support grant claims to cover the cost of medical adaptations. With regard to housing application points, we get support letters from health professionals, and get confirmation of the health related benefits the applicant is in receipt of; regarding maximising benefits, with the tenant's permission, we use health related information as a basis of our claim for benefits; and with regard to medical adaptations, we receive information about the tenant's medical condition from a health professional (usually an Occupational Therapist), and may share sensitive information about medical condition with our funders Development and Regeneration Services (which is a department within Glasgow City Council).

Other parties that we share sensitive personal information with are covered in the following sections.

Just to be clear, when you provide us with your personal information and sensitive personal information, and the personal information and sensitive personal information of other members of your household, you:-

- consent to it being used as described in this paper, and
- confirm that you have informed the other members of your household (of the age of 12 and above) that you have disclosed this information, and that they have provided their consent for their personal information and sensitive personal information being used by us as described in this paper.

What do we use the information that we hold on you for?

We share your personal information with the parties that we need to in order to administer your tenancy, and to provide you with services. The parties that we share your information with include our Contractors and Consultants, our solicitor, parties acting on your behalf, Community Safety Glasgow, the police, Glasgow City Council (social work, HB, DRS), DWP, advice services (where mandated), grant providers, and survey researchers. The information we share, and why we share it is set out on this page and the next.

Community Safety Glasgow

Community Safety Glasgow work with us to address anti-social behaviour complaints, so, as with our Solicitor, we will disclose to Community Safety Glasgow only the personal information (and/or sensitive personal information) relevant to their involvement in the complaint.

Our Contractors and Consultants

The personal information that we give our Contractors and Consultants is limited to only what they need to know to be able to do their job. With the day to day repairs, window replacements, kitchen replacements, bathroom replacements, boiler repairs, and the annual landlord gas servicing, the Contractors/Consultants are told of the nature of work, and are issued with your name, address, and telephone number. They are also informed of any safety concerns that we may have. In the case of adaptations being carried out on medical grounds, our Contractors receive the same information; they are not told anything about the medical condition that necessitates the works. We also share personal information with our call centre, so that they can deal with repairs that come through when the Office is closed, or when telephone calls get diverted to them.

Parties acting on your behalf

That could include your local councillor, your MP, your MSP, your solicitor, or someone that you want to act on your behalf to deal with us. No matter who it is, we won't give out any information about you unless we have a mandate signed by you authorising us to release that information to them.

Our Solicitor

When we obtain legal advice about a situation involving a tenant, or a member of their household, or when we instruct legal action against a tenant, or a member of their household, we will disclose to our solicitor only personal information (and/or sensitive personal information) about that tenant and their household that is relevant to the situation.

Glasgow City Council

We provide personal information to several departments within the Council e.g social work, housing benefit, Development and Regeneration Services (DRS), Cordia etc.. With social work, we will provide personal information (and/or sensitive personal information) generally to help support tenants in their home; with housing benefit, where we have the tenant's permission, we provide personal information (and/or sensitive personal information) to them to help with the administration of claims and payments; when we make a claim for funding to cover the cost of doing a medical adaptation, we may have to share personal information and personal sensitive information (that relates to health conditions) with DRS; and we use Cordia's translation services when we are meeting with tenants who can't speak English very well, so we share their sensitive personal information with Cordia.

Department of Work and Pensions (DWP)

Where we have the tenant's permission, we provide the DWP with the tenant's personal information (and/or sensitive personal information) to help with the administration of benefit claims and payments, and we will also provide them with tenants' personal information in relation to the administration of Universal Credit.

The Trussell Trust

We are 'licensed' to issue food parcels to tenants on behalf of the Trussell Trust. As part of that process, we have to collect personal information, and sensitive personal information about the people we give parcels to. We have to take their name, address, year of birth, ethnicity, the age bands of adults in the household and the age bands of children in the household, get confirmation if anyone in the household is working or not, and ask the reasons why they are using the foodbank.

Police

In the event of suspected criminality, we will follow processes to provide personal information to the police.

Researchers

We carry out regular resident surveys to ascertain how well we are delivering services and to get residents opinion on what services we should be developing. To ensure impartiality and anonymity, we use an independent outside party to survey tenants. The process involves us giving them tenants' names, addresses, telephone numbers, and any safety information that we may have.

We don't share your information with the firms that maintain our computer systems, but they may come across your personal information when they are in doing work to our computer systems. These firms aren't allowed to use your data for their own purposes.

We keep a copy of the form but pass the original on to the Trussell Trust. The Trussell Trust will use the information for their statistical profiles (so they know how many working families have had to use foodbanks etc.), and to check if people are misusing the system by going to different foodbanks to get more than their limit of three food parcels in a six month period. Like the Trussell Trust, we use the information to make sure no-one gets more food parcels than they are due. We also analyse the information to work out what size of food parcels we need, and how many we will need to get from the Trussell Trust the next time that we put in an order.

The Scottish Housing Regulator and Auditors

The Regulator and our auditors (both our internal and external auditors) may access your personal information during the course of their work with the Association.

Other agencies

With the tenant's permission, we will pass relevant personal information on to other agencies. That could be in relation to benefits, or to the likes of the GHeat etc. It could also be for grant providers, like 'Cash for Kids'; in the past we have given them tenants' personal information that related to grants that we were applying for. With most of these agencies we only pass on your contact details, but we make you aware of all the personal information required, and we'll get your permission to forward it on before doing so.

How long do we keep your information for?

We don't keep information on file for longer than is necessary. For tenants, we keep all your information on file up until five years after your tenancy with us has ended – bit of an anomaly to that is, if a gas related 'non conformity' was identified during your last landlord's gas safety inspection, then the law requires us to hold on to the certificate (which will have your name and former address on it) for seven years. You can get a copy of our Data Retention Policy from our Office if you are interested in finding out how long we hold types of data for.

What rights do you have in relation to the personal information that we hold and use?

Under certain circumstances, the law gives you the right to request:-

- A copy of your personal information and to check that we are holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that we hold about you.
- Deletion of your personal information where there is no good reason for us continuing to hold and use it. You also have the right to ask us to do this where you object to us holding and using your personal information.
- Temporarily suspend the use of your personal information, for example, if you want us to check that it is correct or the reason for processing it.
- The transfer of your personal information to another organisation.

You can also object to us holding and using your personal information where our legal basis is a legitimate interest (either our legitimate interests or those of a third party). An example of where we would rely on legitimate interest is where a utilities company gets in touch with us after you have ended your tenancy to let us know that you haven't paid your final electricity bill. In that case, we would have a legitimate interest in passing your new address details (if we have them) to the utilities company for them to chase payment of your outstanding bill so that we are not responsible for it. The utilities company would also have a legitimate interest in chasing payment of the outstanding bill.

You and the other members of your household (of 12 years old and above) have the right to withdraw your consent to us holding and using your, and/or their personal information and sensitive personal information by contacting us. Once you/they have withdrawn your/their consent, we will no longer use your/their personal information and sensitive personal information for the purpose(s) set out earlier in this statement unless we have another legal basis for doing so.

Data Protection Officer (DPO)

Julie Roy is the Association's Data Protection Officer. Contact Julie at the Office if you wish to make a request in relation to any of the information that we hold on you.

When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

Updates

From time to time we'll have to update this statement. We'll send you the updated version when we do.

Complaints

You have the right to make a complaint to the Information Commissioners Office (the UK regulator for data protection) about how we hold and use your personal information. You can contact the Information Commissioners Office via their website, at <https://ico.org.uk/>, or by calling their helpline on 0303 123 1113.

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