

NORTH VIEW Housing Association

North View is a registered Scottish charity – charity registration number SC032963

OWNERS – HOW WE USE YOUR PERSONAL INFORMATION

In this paper, we tell you about the personal information that we hold about you, 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).

What personal information do we hold and what do we use it for?

The singularly most important aspect of the relationship between you (as an owner) and North View (as factor) is the 'Factoring Services' document that has been issued. That is derived from the Property Factors (Scotland) Act 2011; in it we set out the services that we will provide to you and the administration arrangements we have in place to support the delivery of those services. We use your personal information in the delivery of those services, but that information is limited to your name, address, and contact details (which may consist of your land line telephone number, mobile telephone, or email address).

In a nutshell, we use your personal information:-

- To provide you with services as the factor of your property.
- To manage and administer your factoring service; including processing your factor charge, carrying out common repairs to your property, completing safety checks and other periodic maintenance inspections to the common areas of your property, dealing with any complaints that involve you, managing and recovering factoring arrears, and managing and recovering chargeable repairs.
- To communicate with you e.g. sending you letters, Newsletters, our Annual Report etc.
- 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.

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 contact us at the Office to let us know of any changes.

Sensitive personal information

If you have used our Welfare Advice service, or received a food parcel from us, then some of the following issues may apply to you.

What is sensitive personal data?

We may hold some information on you that 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.

Why do we hold this 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 resident profile; that enables us to plan to meet those changes.

Health is the sensitive personal information 'topic' that we use most. We will probably hold information on your health (and/or the health of someone in your household) if you have used our Welfare Rights service to facilitate a benefit claim.

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 is our legal basis for holding and using your personal information?

Data protection laws require us to have a legal reason for holding and using your personal information.

In addition to consent, our other legal reasons for holding and using your personal information are:

- performance and management of the factoring agreement between us;
- legal and regulatory obligations which apply to us as a property factor;
- protection of your vital interests; and
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, including sharing it with the third parties listed in this statement for the purposes described in this statement.

Who do we share your information with?

We share your personal information with the parties that we need to in order to administer your factoring service. The parties that we share your information with could 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 discussed below.

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. This may be in relation to a common repair, or it could be that you have an arrangement for our contractor to service your boiler, or replace your windows, kitchen units or bathroom suite. If that is the case then 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. 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.

Our Solicitor

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

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.

Glasgow City Council's Community Relations Unit

The Community Relations Unit works 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.

Police

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

Benefits

An owner's use of our Welfare Rights service could involve the sharing of personal information (and/or sensitive personal information) to help with the administration of benefit claims and payments.

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.

The Trussell Trust

We are 'licensed' to issue food parcels 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.

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 an order in.

Other agencies

With the owner'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. 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.

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 and owners. The process involves us giving them owners' 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.

Where is your personal information transferred to?

Some of the organisations we share your personal information with listed in this statement may be based or may make use of data storage facilities that are located outside the United Kingdom. Their handling and use of your personal information will involve us and / or them transferring it outside the United Kingdom. When we and / or they do this, we will ensure similar protection is afforded to it by:

- only transferring it or permitting its transfer to countries that have been deemed to provide an adequate level of protection for personal information under data protection laws; or
- using specific contracts with such organisations, which are approved for use in the United Kingdom, and which give your personal information the same protection it has in the United Kingdom after it is transferred.

Please contact our Data Protection Officer (DPO) for further information on the specific mechanism used by us when transferring your personal information outside the United Kingdom.

How long do we keep your information for?

We don't keep information on file for longer than is necessary. 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 us?

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).

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)

Our Data Protection Officer is Julie Roy. You can contact Julie at our 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.

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.

Updates

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

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