



Dumfries and Galloway Housing Partnership Ltd

Privacy Notice

How we use your personal information

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

Dumfries and Galloway Housing Partnership Ltd, a registered Scottish charity (Charity Number SC039896), a Registered Social Landlord, a Company incorporated in Scotland under the Companies Acts as a company limited by guarantee (Registered Number SC220297) and having its Registered Office at Grierson House, The Crichton, Bankend Road, Dumfries DG1 4ZS (“**we**” or “**us**”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 1998 and the General Data Protection Regulation (EU) 2016/679, which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **Z7078924** and we are the data controller of any personal data that you provide to us.

DGHP forms part of the Wheatley Group. The other members of the Wheatley Group include Cube Housing Association, Dunedin Canmore, Loretto Housing, West Lothian Housing Partnership, Glasgow Housing Association and Barony Housing Association.

DGHP's Data Protection Officer is Ranaid Brown and can be contacted at #wheatleydataprotectionofficer@wheatley-group.com or The Data Protection Officer, Dumfries and Galloway Housing Partnership Ltd, Grierson House, The Crichton, Bankend Road, Dumfries.

Information that we hold about you

We collect the following information about you:

- Full name (including proof of your identity/ photo ID);
- address;
- date of birth;
- home phone number;
- mobile phone number;
- email address;
- NI number;
- gender;
- ethnicity;
- disability;
- medical details and health information;
- marital status;
- basic details (name and DOB) of all household residents including any children;
- criminal convictions;
- details of anyone authorised to act on your behalf if applicable;
- your complaints history;
- your banking details if you pay rent by Direct Debit;
- next of kin details.

We collect information about you:

- when you apply for housing with us, become a tenant, request services/ repairs, enter in to a factoring agreement or temporary supported accommodation agreement with ourselves or otherwise provide us with your personal details;
- when you apply to purchase a New Supply Shared Equity Property from us;
- when you apply to become a member;

- make an application to become a board member or member of our District Management Committee;
- when you request any of our services;
- when you request a repair;
- when you provide feedback or make a complaint;
- when you complete one of our customer satisfaction surveys;
- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise;
- via cookies on our website;
- CCTV images when you visit our offices;
- CCTV images when you visit or reside in our supported accommodation premises;
- benefits information;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information);
- from telephone calls to our Customer Service Centre for training and monitoring purposes to ensure we're delivering a good service. Any call recordings will be held in accordance with our document retention policy before being erased;
- from photographs which we may take of you at our events or if you are a member of one of our committees.
- When you use our social media sites or our self service portal.

Calls to our Customer Service Centre are recorded for training and monitoring purposes and our recordings are usually held for a period of three months.

We operate CCTV at our office premises at various locations within the vicinity of our properties for the detection and prevention of crime, to fulfil our legal obligations to keep our staff safe and to keep our offices safe and secure. Our CCTV cameras operate 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 and video footage at events we organise or take part in, at our properties, and in our communities to use for general marketing or publicity. However, photographs of individuals will only be used for these purposes with your consent.

We receive the following information from third parties:

- benefits information, including awards of Housing Benefit/ Universal Credit;
- payments made by you to us via Allpay;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- health and disability information from Dumfries and Galloway Council, to allow us to carry out aids and adaptations to your home;
- welfare information about you or your family from Dumfries and Galloway Council Social Services;
- enquiries on your behalf from local councillors, MSPs and MPs;
- health and disability information from the National Health Service;
- financial and mortgage details from your solicitor or mortgage broker when you purchase a New Supply Shared Equity Property;

Children's Information

DGHP does not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known. We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

This list is not exhaustive, as we hold records of most contact we have with you, or about you, and we process this information so we can deliver services to you. Generally the information we hold will have been provided by you (on application or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing circumstances e.g. from social workers and health professionals (such as doctors and occupational therapists).

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

How will we use this information about you?

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer, including carrying out benchmarking to evaluate our performance;
- To carry out surveys relating to our services;
- To pursue debts owed to us;
- to contact you in order to send you details of any changes to our services or supplies which may affect you;
- to ensure that we meet all of our legal and statutory duties;
- to enable us to meet our legal obligations to our Regulators, funders and partner agencies;
- to contact you for your views on our products and services;
- if we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- for the detection and prevention of crime and anti-social behaviour;
- For equality monitoring purposes as required by government departments and agencies and other organisations where we have a legal obligation to do so.
- for all other purposes consistent with the proper performance of our operations and business.

Our lawful basis for using your information

DGHP's basis in law for holding and using your personal information and sensitive personal information is:

- performance of the tenancy agreement, exclusive occupancy agreement or other agreement that you have entered into with DGHP or to take steps to enter into such agreement;
- where necessary for health or social care purposes;
- where necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection;
- where necessary for the prevention or detection of an unlawful act;
- the legal and regulatory requirements which apply to DGHP as a registered social landlord;
- where necessary to perform a task in the public interest or under DGHP's public functions as a registered social landlord;
- to protect your vital interests;
- DGHP's legitimate interests, including but not limited to contacting you for marketing purposes; and
- Your explicit consent.

Sharing of Your Information

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK and EEA. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- if we instruct repair or maintenance works, your information may be disclosed to any contractor who provide services on our behalf;
- if we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- for partnerships that we enter into with other organisations, such as Police Scotland and Local Authority departments, to help prevent and control anti-social behaviour;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authorities);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authorities and the Department of Work & Pensions;
- our Regulatory Bodies to comply with our statutory responsibilities;

- if we are conducting a survey of our products and/or services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- if we are conducting mailing about our products and/or services your information may be disclosed to third parties who print our leaflets and letters;
- our solicitors and auditors;
- your solicitors and mortgage lenders;
- our funders of our supporting people service to monitor that the service is achieving the intended outcomes, including The Big Lottery and Dumfries and Galloway Council;
- if we are legally required to do so, we will share specific information with law enforcement, government or public bodies and statutory agencies where we are required to do so in order to aid the prevention or detection of crime and fraud, the apprehension or prosecution of offenders, the assessment or collection of tax or duty owed to customs and excise, sharing in relation to the physical or mental health of an individual, where disclosure is required to protect them from serious harm, legal proceedings, research and statistical purposes.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe including:

- network passwords for data servers;
- lockable PC screens with password activation;
- Individual user passwords for housing management software;
- regular prompts for password amendments;
- application permissions and user restricted access;
- internet firewall;
- anti virus/malware software;
- password protected mobile devices;
- clear desk policy.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal information for as long as is necessary for the relevant activity, or as required by law (we may be legally

required to hold some types of information), or as set out in any relevant contract we have with you. Our full Document Retention Policy is available at www.dghp.org.uk or a copy can be obtained at any of our offices.

Your Rights

You have the right at any time to:

- ask for a copy of the personal information about you held by us in our records, by making a “subject access request”;
- require us to correct any inaccuracies in information that we hold about you if you believe it to be incorrect;
- request that we restrict the processing of your personal information for specific purposes;
- make a request to us to delete the personal information we hold about you; and
- object to receiving any marketing communications from us or using your personal information for a particular purpose.

If you would like to exercise any of your rights above please contact us at DP@dghp.org.uk or **The Data Protection Officer, Grierson House, Bankend Road, Dumfries, DG1 4ZS.**

Any requests received by DGHP will be considered under applicable UK Data Protection Legislation.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's Office contact details are noted below:

The Information Commissioner's Office – Scotland

45 Melville Street, Edinburgh, EH3 7HL

Telephone: 0131 244 9001

Email: Scotland@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes.

Changes to our Privacy Notice

Our privacy Notice is regularly kept up to date and this version was updated on 30 April 2020.

The latest full version is always available from our website at <https://www.dghp.org.uk>