

## Privacy Notice November 2022

<b>Contents</b>	<b>Page Number</b>
Introduction	2
Our contact details	2
The type of personal information we collect	2
How we obtain personal information and why we store it	3
Why we use your data	3
Consent	4
How long do we keep your information?	4
How we store your personal information	5
Sharing Information	5
Your data protection rights	6
How to complain	6
Version	7

## Introduction

Kings Barton Housing Association (KBHA) are committed to handling your personal information fairly, lawfully and securely in line with current data protection laws including the UK General Data Protection Regulation (UK GDPR). Our aim is to act inline with our mission statement, to do this we need to access, use and sometimes share your information or personal data. This may include sensitive data about you, known as special category data, for this data, you may state “prefer not to say”.

This notice tells you what we do with your information and why, as well as how, to raise any concerns or exercise any rights you may have about your data. For further details, please ask us about our data protection policy.

The privacy and security of your personal information is extremely important to us.

## Our contact details

Name:	King’s Barton Housing Association
Address:	5 Moravian Road, Kingswood, Bristol BS15 8LY
Phone Number:	0117 9611171
E-mail:	<a href="mailto:info@kingsbarton.co.uk">info@kingsbarton.co.uk</a>
Website:	<a href="http://www.kingsbarton.co.uk">www.kingsbarton.co.uk</a>

## The type of personal information we collect

If you are one of our residents, or an applicant we may need to collect a variety of information about you to ensure that we can provide you with appropriate housing, manage your tenancy, complete works to your property, refer you to appropriate support services to assist you and meet our legal, regulatory and statutory obligations. We will also use information from third parties such as other housing providers, Local Authorities, Department of Work and Pensions, the Police, the Probation Service, support workers, social workers and mental health workers.

It is important that you notify us of any changes to your contact information as soon as possible so that we can contact you easily.



## Personal data

- Name
- Address
- Date of birth
- Contact details National insurance number
- Identification & right to rent
- Proof of residency
- Details of anyone authorised to act on your behalf
- Car registration
- Basic details of all household residents
- Photos
- Financial details e.g. bank and benefits
- Risk to the safety of our colleagues and contractors
- Surveys
- Application/permission/audit forms
- Case management notes
- Supporting documentation.

## Special category data

- Criminal /legal history
- Gender
- Health/Disability
- Nationality
- Race/ethnicity
- Religion

We rely on the lawful basis of public interest for taking account of your needs and reporting anonymised data to the regulator/government and for keeping premises secure.

## How we obtain personal information and why we store it

We will record information whenever you or someone acting on your behalf has contacts with us. This may include Local Authorities, Department of Work and Pensions, contractors and partner agencies. In addition we will also receive information from our contractors, people associated with you such as friends, family, neighbours and other agencies .

If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and consent.

## Sources may include

- Applying for one of our properties or services
- Complete one of our application forms, tenancy agreements, licences
- Calling us, writing to us, emailing or meeting with us
- Responding to a survey
- Visiting our offices or some of our other properties
- Using our website

## Why we use your data

- Assessing eligibility
- Allocation and management of tenancies including financial transactions
- Complaint handling
- Surveys
- Investigation and pursuing of legal action e.g. enforcing tenancy conditions.
- Reporting on equalities.



## Consent

We may sometimes process your data for specific purposes which require your consent, or you may ask for someone else to act on your behalf. In these instances we will ask for your written consent. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time unless exemptions apply as listed in this notice and our GDPR policy.. This may affect the services that we can make available to you.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing information are:

<p>We have a contractual obligation.</p> <p>The tenancy agreement will provide further details. The processing we conduct includes:</p> <ul style="list-style-type: none"><li>• Managing your account charges and payments, including arrears</li><li>• Managing the repairs, maintenance and adaptations of our properties</li><li>• Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud</li><li>• Complying with relevant legislation and regulation</li></ul>	<p>We have a legitimate interest.</p> <p>Our legitimate interests may include the need to:</p> <ul style="list-style-type: none"><li>• eliminate discrimination or advance equality of opportunity;</li><li>• prevent and detect crime;</li><li>• conduct research and statistical analysis to help improve our business processes and the services offered to our customers;</li><li>• evaluate our performance against other benchmarks.</li></ul> <p>When your personal data or information is used for statistical or research purposes it is anonymised or pseudonymised so that you cannot be identified.</p>
<p>We have a vital interest.</p>	<p>We need it to perform a public task.</p>
<p>We have a legal obligation.</p>	<p>Your consent.</p> <p>You are able to remove your consent regarding certain information at any time. You can do this by contacting <a href="mailto:info@kingsbarton.co.uk">info@kingsbarton.co.uk</a></p>

## How long do we keep your information?

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. If there are no outstanding issues, this is usually the length of your tenancy plus six years. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.



## How we store your personal information

Your information is securely stored and it is imperative to us to ensure that we are keeping your data safe.

Personal information is stored and managed within a variety of IT software systems which are maintained to achieve security and confidentiality. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

Our employees complete mandatory data protection training. Only third parties who require access to your information will be able to access it. We do not transfer data outside of the UK.

We will always keep your information secure to maintain your confidentiality.

## Sharing Information

Your personal information will be kept secure and confidential.

We may need to share relevant information with third parties, including contractors we work with such as our repairs and maintenance contractors, IT infrastructure providers, agencies and authorities we work with, such as Local Authorities, Social Services, department of work and pensions, Police (or other emergency services), GPs or other medical professionals, social Housing Providers, auditors, the Board and our regulators. We will also share relevant information with others when KBHA believes it is in your, or the public's, interest to do so, such as to keep customers, staff or visitors safe, or as required by law. When we allow third parties acting on our behalf to access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

We may pass your contact information to a third party to conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you. The third party will be bound to strict terms and conditions outlined by us and will not share your data with other organisations. Should you choose not to participate in the surveys the third party will securely destroy your data.

We may share your National Insurance number to verify your Universal Credit application and manage these payments and to prevent and investigate fraud.

Following the recent pandemic, we may also share limited information about our customers' health (for example if they have tested positive for Covid 19, if they are self-isolating or are vulnerable) with companies we work with. This data is only shared to help ensure we can help ensure the safety of our customers and any contractors who may visit their homes.

Information is shared on the basis that KBHA and the relevant local authority or company have a legitimate interest in supporting our customers and protecting public health

We may sometimes process your data for specific purposes which require your consent, or you may ask for someone else to act on your behalf. In these instances we will ask for your written consent before sharing. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time unless exemptions apply as listed in this notice and our GDPR policy. This may affect the services that we can make available to you.

Please be aware:



- Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct.
- If you default on any tenancy/licence conditions, information about you may be provided to authorised debt recovery agencies, or courts to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information. We may only be able to issue your data electronically via secure, password protected email for example. There are exceptions where some information could not be shared for instance where it may constitute a risk to another person, or where the request is manifestly unfounded or excessive.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances; unless there is a compelling reason for its continued processing, for example if we are required to retain it for statutory purposes, to manage your tenancy, or to protect our legal interests.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances. In some cases we will not be able to restrict our uses of your information, for example if we are required to process it for statutory purposes or to protect our interests.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If the request is complex or multiple requests have been made this may be increased by a further 2 months.

Please contact us at [info@kingsbarton.co.uk](mailto:info@kingsbarton.co.uk), King's Barton Housing Association, 5 Moravian Road, Kingswood, Bristol BS15 8LY or 0117 9611171 if you wish to make a request. Please note proof of identification will be required.



## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details on page 2, or you can see our complaints procedure on our website.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

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

Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>

## Version

<b>Version</b>	1
<b>Date of Policy</b>	November 2022
<b>Last edited by</b>	Rose King
<b>Next review date</b>	November 2025
<b>Responsible person</b>	Housing Manager

