

## Fair Processing Notice for Cathcart & District Housing Association – All Relevant Parties

### How we use your information

Cathcart & District Housing Association is known as “Controller” of the personal data provided to us and is required to make sure all personal information is handled and kept carefully in line with General Data Protection Regulations (GDPR).

The information we collect from you will primarily be basic personal contact details required to carry out our major functions as a social housing provider, however there are occasions where we are required to collect data of a more sensitive nature and this will be treated with the appropriate level of confidentiality.

### We may collect the following personal information about you.

- Personal details: name, addresses, date of birth
- Contact details: home phone number, mobile phone number and email address
- Further details: NI number, gender, ethnicity, disability, medical details, marital status, signature, unacceptable behaviour warnings
- Household composition: details of existing accommodation arrangements and family members seeking accommodation with the applicant
- Tenancy Details: start and end dates, rent paid, under/over payments
- Payment details: bank account details, 3<sup>rd</sup> party payment details
- Repairs: repairs requested, access details, completion dates
- Pseudonymised data: CDHA customer account numbers, rent/factors reference number, share membership number
- Purchase details: solicitors details
- Employment: benefit/council tax status and payments, employment history, education history, tax code, trade union membership

- Employment application details, asylum status, criminal record declaration
- Location: IP address
- Images: event photographs, CCTV images
- Voice recording on our voicemail and office telephones

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so we have a record of what happened.

We need to know your personal data to provide you with the housing services you have engaged with us to provide, and to communicate effectively with all data subjects as required by the Scottish Housing Regulator.

### We need your personal information to allow us to be able to:

- Process and manage housing applications
- Sign up new tenants to suitable properties
- Carry out duties highlighted in contract as landlord
- Meet our legal obligations including information that we have to provide to regulators and statutory authorities
- Adhering to statutory regulation and providing yearly returns and statistics
- Reply to enquiries and contact all customers when required
- Provide an efficient maintenance service ensuring our properties and repairs are of an appropriate standard
- Issue invoices and follow up contact where required
- Deliver a value for money factoring facility for owners
- Ensure we have enough resources to carry out all functions
- Managing payments from you or your account and for accounting purposes
- Process your job application
- Prevention and detection of crime

- Perform or assist in debt recovery or court actions
- Facilitate any necessary legal proceedings
- Issue satisfaction surveys, newsletters and service information
- Administer lets and training sessions

## Sharing your Information

All personal data we process is processed by our staff in the UK. We sometimes need to share personal information with other organisations, however where this is necessary, we are required to comply with all aspects of GDPR. Even when this is required, we only share data within the European Union (EU). We do not give anyone else access to your information in return for payment, for their marketing and commercial purposes.

Cathcart & District Housing Association may enter into partnerships with other organisations such as local authorities and the police. For example, we may join a partnership to help prevent and control anti-social behaviour. We will enter into a formal data sharing agreement to govern the process and ensure it is lawful. That agreement will be approved by our Data Protection Officer before it is implemented. The types of organisations we may share with in these instances are the following

- Glasgow City Council
- Community Safety Glasgow
- Other landlords
- Solicitors
- Trustees
- Sheriff Officers

We are also required to share information with statutory bodies governing finance and housing industries, for auditing and inspection purposes. However this will be restricted to the actual information required from the association and will be mainly viewed within the association, with strict permission set on our electronic file system to ensure use is controlled. We will also encrypt and limit the content of any files that do have to be sent either electronically or otherwise.

We will share specific and relevant information with law enforcement, government or public bodies and statutory agencies where we are legally 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 physical or mental health of an individual, where disclosure is required to protect them or others from serious harm
- Sharing in connection with legal proceedings
- Research and statistical purposes

Cathcart & District Housing Association remains responsible for the fair and lawful processing of all personal data shared with suppliers. Unless we have requested your specific consent, we only share information with other external organisations or agencies that we have a signed agreement to do so with ensuring as data processor, all data they manage remains compliant to GDPR.

## Contractors and suppliers

We may share your personal information with our suppliers who provide a service to you, or who provide services on our behalf. The data shared is the specific information the supplier requires to carry out their task, as well as any information that ensures we fulfil our health and safety obligations to the people carrying out the task. We may share this information with the following organisations:

- Maintenance contractors and suppliers
- Printing and mail distribution
- Customer surveys
- Insurers
- Banks
- Payment card, direct debit and billing solutions
- Document storage and archive scanning

In order to ensure all tenants have the required utilities available when they sign up to a tenancy with Cathcart & District Housing Association, we may also provide names and addresses, forwarding addresses, contact details and tenancy dates to utility providers.

## Special Category Data

There are certain occasions where it will be necessary to perform our functions as a social housing landlord for us to share information containing special categories of data. Currently we

would only ever share the following type of this more sensitive information:

- Racial or ethnic origin: Shared with statutory bodies and reported on as a statistical breakdown of housing or job applicants only, not including any actual personal data.

### **Third Party Access**

Any third party who Cathcart & District Housing Association gives access to our electronic files is therefore called a Data Processor because they are processing Data on behalf of the Association. Although the Data Controller and Data Processor are two separate entities, we are required to ensure all third party access is given in compliance with all GDPR principles, and to this effect will have a third party access agreement in place.

The following organisations may be given controlled access to our electronic data for reasons of security, maintenance, or any specific purposes outlined in their third party agreement.

- IT maintenance/support contractors
- Specialist housing software providers
- User and file system auditing software provider

### **Power of Attorney**

If you wish anyone to deal with your affairs on your behalf please find the specific consent form for this on our website or request this from our office. This allows you to request a named person permission to discuss specific or all of your personal data with the Association as required.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity, or check that we have your approval to deal with them.

### **Violent or abusive behaviour**

If you are violent or abusive to Cathcart & District Housing Association staff, customers, or other residents, we may decide to place a "warning marker" on your customer record in order to

protect Cathcart & District Housing Association colleagues.

If we do this we will write and tell you why and you will have the right to appeal against our decision as per our Unacceptable Behaviour Policy. We will share this information with our partners, for example our contractors, Fire & Rescue Service in order to protect their colleagues too.

### **How we store your personal information**

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access.

Unless you pay your bills using direct debit we will not usually retain your payment details. Whoever pays your bills will have to give us the payment card details each time they make a payment.

If we store your personal information and can do so solely on computers we will, however there will be cases where we have paper copies instead, or in addition to this. All computers are kept in a secure location and are password protected, with unusual and unauthorised access monitored by specialist auditing software and our electronic files kept on shared network accessed by our computers are controlled by strict access permissions so data is only available to those who need to use it. Paper files containing personal information may be kept in drawers, cabinets or rooms.

Our computer systems are located in our offices in Cathcart but we occasionally use computers and laptops offsite, however they will at all times remain secure and under our control.

We will keep your personal details for no longer than necessary. Once the information is no longer required for the lawful purpose for which it was obtained it will be destroyed.

More information on the document retention schedule adopted by the Association can be found in the National Housing Federations most recent guide to document retention available online at [www.housing.org.uk/resource-library/browse/document-retention-for-housing-associations](http://www.housing.org.uk/resource-library/browse/document-retention-for-housing-associations)

## **Your rights**

If at any point you believe that information we hold is incorrect you may request to see it, have it corrected or deleted. You are entitled to request a copy of any personal data we hold of yours.

You have the right to ask us not to process all or part of the personal information we have received, however we may be unable to provide our service to you if we are unable to record and process certain details.

If you wish to complain about how we have handled your data you can contact our Data Protection Officer who will investigate the matter on your behalf. If you are not satisfied with our response you may submit a formal complaint to the Information Commissioners Office.

As of 11<sup>th</sup> November 2019, Cathcart & District Housing Association is deemed to be a Public Authority under the Freedom of Information (Scotland) Act 2002 and is, therefore, required to appoint a Data Protection Officer (DPO). We have engaged with RGDP LLP ([www.rgdp.co.uk](http://www.rgdp.co.uk)) to act as our Data Protection Officer.

To contact them, please email [info@rgdp.co.uk](mailto:info@rgdp.co.uk). Please also copy us in at: [info@cathcartha.co.uk](mailto:info@cathcartha.co.uk).