



Inverclyde Common Housing Register (ICHR)

GDPR Fair Processing Notice

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?

Inverclyde Common Housing Register (ICHR) is an unincorporated partnership between 5 housing associations: Cloch Housing Association Ltd, Larkfield Housing Association Ltd, Link Housing Association Ltd, Oak Tree Housing Association Ltd and Sanctuary Scotland Housing Association Ltd.

The ICHR service is delivered from the offices of Cloch, Larkfield and Oak Tree Housing Association. We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the [Data Protection Act of 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.

Each partner is notified as a Data Controller with the Office of the Information Commissioner and we are jointly the data controllers of any personal data that you provide to us. The registration numbers of each partner is shown below:

Cloch Housing Association Ltd, Z1221458
Larkfield housing Association Ltd, Z6154596
Oak Tree Housing Association Ltd, Z6295637
Link Housing Association Ltd, Z5787154
Sanctuary Scotland Housing Association Ltd, Z8561790.

A Data Protection Officer is an individual who has an over-arching responsibility and oversight over compliance by the Association with Data Protection laws. The Associations have elected not to appoint a Data Protection Officer, rather to have Lead Officer who will take charge of the day to day management of data protection. In the future, should it be needed, the Associations may appoint a Data Protection Officer. The DP Lead for Oak Tree Housing Association is Anne Culley.

Any questions relating to this notice and our privacy practices should be sent to Inverclyde Common Housing Register, c/o 41 High Street, Greenock, PA15 1NR.

How we collect information from you and what information we collect

We collect information about you:

- when you make an online application for housing with the ICHR or otherwise provide us with your personal details

- When we receive information from ICIL (Inverclyde Centre for Independent Living), HSCP (Health and Social Care Partnership) and other Registered Social landlords (RSLs)
- When you complete an online survey or use our online chat facility.

We may collect the following information about you (and in the case of applicants, other members of your household):

- name;
- address;
- date of birth;
- telephone numbers;
- e-mail address(es);
- application number
- Details of anyone authorised to act on your behalf;
- Relationship to staff, members of committee & ex staff/members of committee in the last 12 months;
- Household details including dependants;
- Previous addresses;
- Medical information;
- Online chat messages
- Personal information provided in surveys
- Proof of residence (collected at home visit)
- During office appointments or visits to your home
- CCTV footage
- Special Category information (for example ethnic origin, disability status, restricted information re MAPPA risk, medical information, language, impairments, supporting agencies, relationship to staff and committee and communication needs.

If you provide us with personal information relating to members of your family or your other residents, we will assume that you do so with their knowledge and consent. Information you give us relating to those that live with you will be retained and processed as this information is necessary for us to process your housing application.

We receive the following information from third parties:

- Referrals from various agencies in relation to your application for re-housing;
- Medical information from Occupational Therapist, hospital and GPs;
- Complaints references from previous tenancies, rechargeable repairs, outstanding debt and complaints of anti-social behaviour from other RSLs;

Why we need this information about you and how it will be used

We need your information and will use your information:

- To process your online housing application and assess your housing requirements and enable you to bid for available properties
- To ensure that information is available to partner landlords to consider Community Care Referrals;
- To enable technical issues with your application to be dealt with;
- For reporting statistical information including Annual Return Charter and Committee reports;
- to enable us to respond to your housing application and complaints made;

- to analyse the survey information that we collect so that we can administer, support and improve and develop our business and the service we offer;
- to communicate with you regarding your application and provide information to help you to bid for suitable available properties
- For publicity and PR information;
- for all other purposes consistent with the proper performance of our operations and business;

Where you have entered into a contract with us (a lease, for example) we will process your personal data in order to implement that contract and to carry out our contractual obligations and exercise our contractual rights.

Where we are performing one of the following statutory public functions, we are processing your personal data because it is necessary for us to perform a task carried out in the public interest: the prevention and alleviation of homelessness

- the management of social housing accommodation (i.e. where an RSL has granted a Scottish secure tenancy or short Scottish secure tenancy)
- the provision and management of sites for gypsies and travellers
- supplying information to the Scottish Housing Regulator in relation to its financial well-being and standards of governance

In other cases we have a legitimate interest in processing personal data which allows us to provide you with a better customer service and to promote our work.

We may also process your personal data as required by law and to comply with a legal obligation to which we are subject.

In some cases we may require your consent to process certain types of personal data. Where we seek consent from you, we will provide full details of what we are seeking consent for, so that you will be able to carefully consider whether to provide 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/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:

- Your information may be disclosed to software/IT providers maintaining our systems.
- If you have asked us to, we will share information with someone acting on your behalf.
- If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- If we process an on-line application form for you your details may be shared with the ICHR Team, staff within the partner Landlords, Police Scotland, and someone you have mandated to share your information with, elected official (e.g. MP, MSP, Councillor) and HSCP.
- If we receive a referral form for you we may share this information with partner landlords and we may make referrals to support agencies with your permission;
- To make a referral to Future Skills to help to support you to make an online application;

- We hold a record of Service Complaints, comments and compliments and this information may be shared with the SPSO or the Scottish Housing Regulator;
- We send and receive e-mail and WIM messages through our online system;
- We grant access to auditors, internal auditors, Scottish Housing Regulator, or anybody carrying out and audit of our services or systems.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Your information will only be stored within the UK and EEA

Security

Our computer systems and network storage systems are all password protected, they are managed and monitored by specialist security software. Internal security permissions are used to manage access to files so only the relevant staff required to use the data have access to it.

We also have the ability to use mobile devices such as laptops and tablets. These devices are also managed centrally and have the relevant methods of security installed.

Access to our computer databases and systems may be granted to IT Support Contractors, Software Providers doing maintenance and any other 3rd Party we have working on our computer network, communications software or systems. Those 3rd parties should be covered by their own policies and our addendum to any contract or data sharing agreement.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data 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.

We will generally keep your information for the following minimum periods:

The table below sets out retention periods for Personal Data held and processed by the ICHR. The ICHR recognises that not all Personal Data can be processed and retained for the same duration, and retention will depend on the individual circumstances relative to the Data Subject whose Personal Data is stored.

Type of record	Suggested retention time
Applicants application or accommodation	5 years from when applicant is re-housed or becomes inactive
Survey monkey results	1 year
Community Care Referrals	Reviewed quarterly and removed when re-housed or no longer seeking housing
Online chat information	monthly by provider
Home Connection Support Logs	1 year

After this period information will be destroyed if it is no longer required for the reasons it was obtained.

Our partners' full retention schedules are available on each of their websites – see links below.

<https://www.oaktreeha.org.uk/>

<https://www.clochhousing.org.uk/>

<https://www.larkfieldha.org.uk/>

<https://linkhousing.org.uk/>

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of your we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at info@inverclydechr.org.uk

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 contact details are noted below:

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

0303 123 1113
www.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 to your email address and other contact details