

CHISLEHURST AND SIDCUP HOUSING ASSOCIATION PRIVACY NOTICE

Chislehurst and Sidcup Housing Association (the Association) is a Registered Provider and is regulated by the Regulator of Social Housing. We provide social housing and support to individuals. The Association is the controller of information and decides the manner and purpose of how personal information is processed. The appointed Data Protection Officer for the Association is the Chief Executive who can be contacted at csinfo@cscha.org.uk.

This privacy notice tells you what to expect when Chislehurst and Sidcup Housing Association processes your personal information. It applies to information about housing applicants, tenants and other service users.

The Association collects personal information in accordance with the Data Protection Act 2018 (DPA 2018) as well as the General Data Protection Regulations (GDPR). Any personal information obtained will be collected when needed and processed and stored fairly and lawfully. We will also make it clear any consequences of not providing information that we request.

OUR CONTACT DETAILS

Our operating office is 45 Invicta Close, Chislehurst, Kent, BR7 6SJ

Our generic email address is: csinfo@cscha.org.uk

Our main telephone number is: 020 8467 9146

Our web address is: www.cscha.org.uk

The main point of contact for issues relating to GDPR and data Protections is the CSHA Chief Executive Officer

WHAT IS PERSONAL INFORMATION

Personal information is any information that can be used to identify a living person. For example we collect names, addresses etc. about applicants in order to assess their suitability for our accommodation. In addition, we may also request sensitive personal information such as information about physical or mental health conditions.

TYPES OF INFORMATION WE COLLECT

Personal information that we collect includes:

- Names
- Addresses (current and former)
- Dates of birth
- E-mail addresses
- National insurance numbers
- Bank details

Most of the information we hold will be collected directly from you but we may also obtain this from third parties such as local authorities, your doctor (or other health professional), a previous landlord or other relevant community partner.

In some cases we also collect sensitive personal information about physical and mental health conditions in order to complete our assessments; and we will always obtain consent before collecting details of this nature.

LAWFUL BASES FOR COLLECTING AND PROCESSING INFORMATION

Under the GDPR, the lawful bases we rely on for processing information are:

- Your consent. You have the right to withdraw your consent at any time. You can do this by contacting us on 020 8467 9146.
- We have a contractual obligation
- We have a legitimate interest

HOW WE USE PERSONAL INFORMATION

More specifically, we will use your information:

- To prioritise and assess housing applications and complete tenancy sign-ups
- To manage your tenancy:
- To meet your needs in our service delivery
- To prevent fraud and illegal sub-letting and to confirm eligibility for housing
- To assist with personal security and prevention and detection of crime
- When you engage with our additional guidance, advice and support services
- As part of a contractual requirement
- To understand how we are performing
- To segment tenants and service users to help target our resources and prioritise services.
- To manage and analyse complaints
- For statistical analysis

STORAGE OF PERSONAL INFORMATION

When you give us your personal information we take steps to make sure it is stored securely and safely. Therefore:

- Paper records containing personal information are kept in locked filing cabinets
- Computers are password protected and locked when staff are not at their work stations
- Paper records are reviewed in accordance with the Association's Annual Data Cleansing and Retention Process and any that are no longer needed are shredded or disposed of as confidential waste.

SHARING INFORMATION WITH THIRD PARTIES

We may also share information about you with third parties including sharing information that enables:

- Contractors to carry out repairs and maintenance in your home
- The Police, local authorities to carry out their duties
- Banks, local authority departments or other government departments e.g. Department of Works and Pensions to confirm payment details
- The emergency services to provide services whenever required

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

YOUR RIGHTS

Under data protection law, you have rights including:

The right to be informed

Through the provision of privacy notices, we will be open and transparent about how and why we use your personal information.

The right of access

You have a right to ask us what personal information we hold about you and to request a copy of your information. This is known as a 'subject access request' (SAR). The Association has a separate procedure for dealing with SARs; this is available on request.

The right to rectification

You can ask us to rectify your personal information if it is inaccurate or incomplete. Please help us to keep our records accurate by keeping us informed if your details change. We will respond within one month. This can be extended by two months where the request for rectification is complex.

The right to erasure

The right to erasure is also known as ‘the right to be forgotten’. In some circumstances, you can ask us to delete or remove personal information, where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the information. Our response will also be guided by the provisions of our Annual Data Cleansing and Retention Process and the GDPR.

The right to restrict processing

In some circumstances you can ask us to restrict processing, for example:-

- If you disagree with the accuracy of personal information.
- If we are processing your information on the grounds of legitimate interests (as detailed earlier), and whilst we consider whether our legitimate grounds override those of yours.
- When processing is unlawful and you are against erasing the information and requests a restriction on the processing of information instead.
- If we no longer need the personal information but you require the information to establish, exercise or defend a legal claim.

The right to data portability

This allows you to obtain and reuse your personal information for your own purposes across different services. It allows you to move, copy or transfer personal information we hold about you across different services, you may be able to ask us to do this.

The right to object

You can tell us if you object to our processing of your personal information, based on legitimate interests or for the purpose of direct marketing, including profiling.

Rights in relation to automated decision making and profiling

You can ask us to review any decisions that are determined by automated means.

You can also object to our use of your personal information for profiling.

If you'd like to talk to us about your rights, you can contact us at csinfo@csha.org.uk alternatively on 0208 467 9146.

We will keep our privacy notice under regular review and we will let you know if there are any changes. If you would like to receive a hard copy of our privacy notice, please let us know. For further details of how we use your information, how we maintain the security of your information, and your rights to access information please see our Privacy Policy.

AUTOMATED DECISION MAKING AND PROFILING

The Association is aware that the GDPR has provisions on the use of automated decision making and profiling of personal information. The Association does not use any form of automated decision making applications in the processing of personal information. All personal information is processed by suitably qualified staff who are directly employed by the Association; and who are responsible for carrying out their duties in line with the DPA 2018 and the GDPR.

TRANSFER OF INFORMATION OUTSIDE THE UK

The Association is aware that under the GDPR we may not transfer any information outside of the European Union regardless of the size of the transfer or the frequency of transfer, other than by applicable restrictions. In carrying out any of its operational responsibilities, the Association does not transfer any personal information outside the European Union on any basis.

RETENTION AND DELETION

Some personal information will be held for the duration of our relationship with you; and for a set period afterwards to allow us to meet our legal obligations, including resolving any follow up issues between us.

Some documents containing personal information, such as tenant satisfaction forms, are destroyed as soon as information (not personal) is added to the management information system.

Staff within the Association follow the IT Policy, Annual Data Cleansing and Retention Process for the retention and destruction of information including personal information. The Association's Annual Data Cleansing and Retention Process, based on legal requirements, best practice and National Housing Federation guidance, sets out how long we keep different types of information for.

ONLINE ACTIVITIES:

Use of cookies

We use cookies to provide statistical information regarding the use of our website. Such information will not identify you personally. It gathers statistical data about the number of visitors to our website. We may also gather information about general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies.

Use of website by children

The analytics software on our website does not identify any personal or demographic information of visitors. The Association does not provide services directly to children however we acknowledge that children may visit our website. Due to the nature of the website content, the Association does not envisage that parental controls or privacy settings are required.

Third party advertising

Our website does not use third party advertising or any other marketing activities that are aimed at children or other potential visitors to our website.

HOW TO COMPLAIN

If you wish to raise a complaint about the way we have processed your information or would like to seek an independent view, you can contact the Information Commissioner's Office using the contact details provided at the end of this notice.

For further information you can contact the Data Protection Officer as follows:-

The Data Protection Officer
45 Invicta Close
Chislehurst
Kent
BR7 6SJ
csinfo@csha.org.uk

For independent advice about data protection, privacy, e-privacy and data sharing issues, you can contact the Information Commissioner's Office. Lots of useful information is accessible on their website:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113
Email: casework@ico.org.uk
Website: www.ico.org.uk