



Your Privacy Matters

Advice and information



watford
community
housing

About this booklet

This booklet has been written to give you information about how we're handling or intend to handle your personal information and to provide you with details of our commitment and approach to protecting your rights to privacy and information security.

We take your privacy seriously and are committed to protecting your information through a range of measures, including policies and procedures that set out our approach to data protection and information security. We will implement sufficient organisational and technical control measures to protect and safeguard your personal information

whilst under our control, and keep up-to-date records of our processing activities, privacy risk assessments and decisions about our processing activities.

We respect and uphold your fundamental information rights and freedoms and we ensure they're fully considered when making decisions that could affect you. We've also put in place the necessary steps to assist anyone wishing to exercise these rights.

These are detailed throughout this booklet alongside the details of how we manage your information during your tenancy or relationship with us.

Data protection – the background

New data protection legislation came into force in 2018 to better protect people's privacy and help prevent data breaches. It applies to all public bodies, businesses and other organisations processing people's information.

It consists of the General Data Protection Regulation (GDPR) and Data Protection Act 2018 which came into force on 25 May 2018. These are together 'the Data Protection Laws'. Under GDPR we must tell you how and why we use personal data and this booklet therefore sets out

the basis on which any personal data we collect, create or otherwise obtain from you or about you will be handled.

We aim to always handle your personal information fairly, transparently and lawfully and this booklet is intended to give you the information you need to understand what we're doing with your data. If you have any questions about how your information is used or think we could improve this booklet, please contact our Data Protection Officer c/o 59 Clarendon Road, Watford WD17 1LA.

Watford Community Housing and GDPR

Watford Community Housing is a 'data controller' under Data Protection Laws. This means we can make decisions about how to process the personal information we need in the course of our business.

We have a nominated Data Protection Officer to support our compliance with Data Protection Laws, to inform and advise us about our legal obligations and monitor the organisation's compliance with our own policies and procedures.

The Data Protection Officer supports the organisation and our employees by raising awareness of data protection issues and keeping up-to-date with changing laws and best practice. They develop our knowledge and understanding through training and workshop activities, oversee our privacy impact assessments and act as a point of reference for the organisation and our customers.

Information we hold

The information we hold about you may vary depending on what services we're providing to you. It may also come directly from you or other sources explained within this booklet. Personal information will only be collected, created or otherwise obtained for specific, explicit and legitimate purposes relating to different aspects of your tenancy and will not be used for any other incompatible purpose.

The processing of your personal data will only be undertaken in a fair, lawful

and transparent way. This means we'll notify you at the point of collecting your information what the purpose is, what we intend to use your information for and the lawful grounds for processing in this way. We do this by way of an appropriate privacy notice, such as this booklet. The privacy notice will provide you with sufficient information about how your personal data will be processed.

As a social landlord, we may collect, create or otherwise obtain the following information:

Tenancy records

We hold your name, address, gender, contact details such as telephone number(s) and email address(es), marital status, date of birth, National Insurance number, health information, information about other occupants, next of kin, proof of identity, bank account details and other financial information such as employment information, benefits entitlement and your household income on our housing management system. This is obtained either from you or the relevant local authority who pass your details to us and it is checked and updated at regular tenancy audits during your tenancy. Where you sign up to our online payment system to pay your rent and service charges, your banking and payment method will be shared with the system provider to provide you with this service.

Your information is obtained to enable us to assess your ability to take on the home financially, maintain contact with you over the course of your tenancy and support you in maintaining your tenancy going forward.

We'll collect some information about other household members who'll be living with you in order to assess your housing application and manage any issues arising during your tenancy. We receive Housing Benefit information from local authorities to be able to correctly calculate chargeable rent to eligible tenants and we advise local

authorities annually of any change in your rent or service charge for the purpose of Housing Benefit assessment.

During your tenancy if we need to manage any rent/service charge issues these may be shared with our legal advisers, debt collection agencies or the court system in serious cases. We use profiling software to identify and monitor tenants at risk of rent arrears so as to prevent this happening but we do not make any decisions affecting you that are taken solely through automated decision-making.

If it became necessary to evict you from your home and any children were affected we may share basic information with the relevant local authority children's services to ensure those children were adequately housed and safeguarded. If you asked us to share information about an intended eviction with your legal advisers or a support agency/organisation we would do so with your clear written consent.

We may also obtain and store information in relation to any application you may make to exchange your home with another social housing tenant, the succession of your tenancy to next of kin, any case of anti-social behaviour or any concerns about your welfare. Information about anti-social behaviour may be shared with the police, relevant local authority or community mental health

services. Cases of actual or suspected fraud may be shared with the police.

We will also collect other information about you to enable us to manage your tenancy effectively, monitor our housing allocations and for statistical and regulatory reporting purposes.

This includes your ethnicity, nationality, religion, language preference, sexual and gender orientation. We use profiling tools to carry out statistical reporting on certain data some of which is sensitive in nature such as health and ethnicity information.

Additional support

If you require your property to be altered on account of a physical need we would share basic information about you (or another relevant household member), such as your contact details and date of birth with our contractors or partner organisations to enable the work in question to be carried out.

If you live in one of our Independent Living or Flexicare schemes, we'll also need information about your health and support needs to ensure appropriate care or support is provided by us or another agency involved in your care. Some of this information is shared with our 24-hour community alarm service to enable them to support you in an emergency. We may also ask for sensitive information for equality monitoring purposes.

If we make a Community Navigator referral on your behalf, a scheme run in partnership with various organisations across Hertfordshire providing additional support in health and wellbeing, we'll share your (and your GP's) contact details, NHS and National Insurance numbers and health/needs information with the organisation co-ordinating the scheme.

If you request additional services like our Handyperson service or Assisted Gardening scheme, we would need to collect and in some cases share essential information about your health with other partners and providers.

Where we capture sensitive information (eg about your health) for additional support services, we will ask for your clear written consent.

Dealing with your queries, feedback and satisfaction

You can raise a query about your tenancy or our wider services with any member of staff but many of our customers' queries are handled by our Customer Service Centre (CSC) over the phone.

At certain times of the year (such as bank holidays) an out-of-hours contact centre may take calls on their behalf and they would have access to your (and other household members') basic contact details, information about your health and any disabilities, whether you've given us permission to discuss your tenancy with another person and any matter a contractor should be aware of before entering your property.

This information is shared with the contact centre so they can support you on our behalf.

During your tenancy we will also ask for and deal with feedback you give us, and we collect this in a number of ways including by phone, email, letter and online. We will also ask for your feedback at other times to gauge how our services are performing. As part of this we may ask external market research companies to carry out satisfaction (or other) surveys on our behalf and therefore pass basic details about you, such as name, address and contact details, to facilitate this. You will always be able to choose whether to participate in these surveys or not.

CCTV

We rely on and use CCTV as an effective tool in helping us to achieve our aims and regulatory duties of creating safer communities and spaces in and around our residential properties, community hubs, commercial premises, office buildings, managed properties and to create safe environments where people want to live and work. The use of CCTV is governed and controlled by our CCTV Policy to ensure that we comply with

all legislative and regulatory obligations that restrict the use and purpose of surveillance systems.

We are obliged to share information with the relevant authorities for the detection and prevention of crime. The request for this information may be made under police warrant or court order. We may also share CCTV footage in safeguarding cases.

Maintaining your home

We'll share basic information about you (and other household members where relevant) with our contractors if we need to deal with a repair in your home or carry out scheduled safety inspections, maintenance or upgrade work such as replacing a kitchen, bathroom or boiler. This would cover your basic contact details but may also include information

recorded on our housing management system about matters the contractor should be aware of before entering your property. We would pass relevant information to our solicitors or the courts if we'd been unable to access your home for an annual gas safety check or to carry out any of our other duties as a landlord.

Purchasing your home

If you apply to purchase your home under the Right to Buy or Right to Acquire schemes we will need to obtain information from you to assess whether you are eligible to make the application and that you could afford to buy the property. This will include obtaining proof of your identity to safeguard against fraud and information about your financial position, employment and National Insurance number.

We would also obtain details about any other household members who are making the application with you. We would share this with the relevant local authority and police if fraud was suspected and with your and our legal advisers and the District Valuer in all other cases. We may also share application details with your mortgage company as part of any mortgage application.



New developments

We have an ambitious development programme to deliver more affordable homes in our local communities. When planning new development schemes we may hold planning and consultation events to obtain feedback from the public and local residents about proposed schemes and, when we do, those participating may agree to give us their name and contact details to meaningfully feed into the process.

If you move into a newly developed scheme and there are outstanding 'snagging' issues to address, we'll share your contact details with our contractors so they can arrange to put these right. After you move in, we'll inform the relevant local authority and utilities companies so they can update their account information accordingly.

Community events and engagement

If you book one of our community hubs for an activity or event we'll record your contact details, payment information and general information about the nature of the booking.

We may also keep you informed about developments in the housing sector and contact you about Watford Community Housing membership and other opportunities to get involved in our work.

Marketing activities

As a community-based housing provider, we're keen to keep you regularly updated with postal communications about our work and other community-focused projects, and to tell you about additional services or benefits we think you'd be interested in such as details about becoming a member. We consider it to be in our legitimate interest to communicate with you in this way, as we're committed

to working closely with tenants to provide high-quality community services.

Communicating with you by email or telephone is often quicker, easier and more cost-effective, but for us to communicate with you in this way we need to obtain your clear consent. When we collect your information for email marketing purposes we'll always provide

you with a clear statement informing you of your right to opt out of email marketing communications. The ability to opt out will appear at every subsequent email marketing communication that you may receive.

From time to time we may take photos of people attending our community events to use in our communications and marketing literature. We will obtain your consent before taking or using your photograph wherever possible. At public events with a lot of attendees it's not practical or possible to obtain consent in every case, and we'll therefore

prominently display public notices informing people that photos may be taken, so that if anyone wants to object, they can. We store all photographs for historical, marketing or archiving purposes for a limited time.

We use an online mailing tool to email our monthly newsletter and external printers to issue rent statements, service charge letters, publications and other correspondence. We'll never share your tenancy information with third-party organisations for their own marketing or commercial purposes without your consent.

Becoming a Watford Community Housing member

If you apply to become a member of Watford Community Housing you'll fill in an application form confirming your basic contact details which enables us to get in touch from time to time with news, details of events and invitations to attend

Annual General Meetings where you can vote on certain matters affecting the organisation and its work. We don't share this information, sell it or pass it on to anyone else for marketing or commercial reasons.

Website

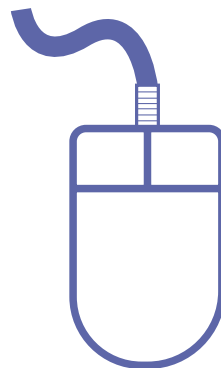
If you have a 'digital tenancy services' account through our website to report an issue to us, check your rent account, or request another service, we'll collect relevant information to support these services through our online portal.

Our website only collects information when it is submitted by you, for instance when you submit a CV or a request for further information. This information is only used for the purpose for which it is submitted.

We may also collect IP addresses for the purposes of systems administration and to audit the use of our website. An IP address (Internet Protocol) is an identifier that is automatically assigned to your computer whenever you log on to the internet. We do not link any IP addresses to any personal information and so the user remains anonymous to us. The website also uses technology

called 'cookies', which are small computer files that are placed in your computer's memory. Cookies can be used to improve functionality and delivery of the webpage on the device that you're viewing the webpage from. They can also be used to track the total number of visits to the website for the purpose of improving the services that we offer. We do not use cookies to collect personal information about you. You have the ability via the device that you are using to accept or decline cookies. You will need to refer to your internet browser's help function to learn more about these functions.

Our website may provide links to other webpages as a service to our users. Please ensure you check the legal and privacy statements posted on each site that you link to as these are independent and separate from ours and may track or collect information in different ways to our website.



The legal basis for processing your information is as below:

Processing	Reason	Legal Basis
Tenancy records and property management or repairs	To support your tenancy and contractual relationship with us; For property management, maintenance and repairs; For taking steps towards a contract (home exchange/tenancy succession/home purchase)	Contract Performance
Feedback and satisfaction	To resolve issues that you may experience with your home or tenancy; To continually improve our services; General enquiry handling	Legitimate interest
Profiling	To enable us to determine those at risk of rent arrears, to tailor our services to meet your needs and to comply with our legal and regulatory requirements	Legitimate interest
Marketing	Postal communications of a marketing nature - legitimate interest; Email communications of a marketing nature - consent	Legitimate interest or consent

Processing	Reason	Legal Basis
Lawful and regulatory purposes	To comply with any lawful or regulatory obligation	Legal obligation
CCTV	For the purpose of crime detection, prevention measures and provision of safer communities	Legitimate interest
Processing of information for welfare purposes	For welfare purposes and effective service delivery; For social welfare and protection laws.	Consent, legitimate interest and social protection
Processing of information for crime prevention	For the prevention of anti-social behaviour, fraudulent activities, crime prevention and to protect the welfare and security of property	Legitimate interest, public interest and social protection

Required information

The provision of some items of personal data is a condition of your tenancy with us. Mandatory information is however kept to a minimum wherever possible. If you don't want to provide this information to us it's likely we won't be able to offer you a tenancy.



International transfers of personal data

We use several online platforms for different purposes that have servers based in the USA and as such are not caught by the provisions of the GDPR, which apply to the EU. The companies that own these platforms all subscribe to the EU-US Privacy Shield which means that those companies have adopted business practices that are EU-approved from a data protective perspective.

We use the following companies:

- Mailchimp – to send out our monthly digital newsletters;
- SurveyMonkey – to send out tenancy questionnaires by email from time to time;
- Google photos – to store electronic images and photos used by the Marketing & Communications team.

These companies are all registered on Privacy Shield and their registrations can be viewed at: www.privacyshield.gov/list

Data retention

We keep documents relating to your tenancy for six years after it comes to an end, and other documents for as long as the organisation reasonably requires, which varies according to the nature and

purpose of the document concerned. Further information about our retention periods is available in our Retention Policy and Schedules, which are available on request.

Children's data

We'll collect the names, dates of birth and ages of any children in your household at the start of your tenancy. Where a child has higher support needs we may receive information about those needs where they are relevant to your housing application.

This is checked at routine tenancy audits. We may share specific concerns about children's safety and wellbeing with the relevant local authority and other agencies if we were obliged to make a 'safeguarding' referral or following an eviction affecting a child.

Your rights

You have certain rights under data protection law including the right to ask for access to, and the correction or erasure of, personal data that we hold about you. You also have the right to object to direct marketing and to restrict our processing of your personal data. You can exercise your rights at any time by contacting Watford Community Housing's Data Protection Officer and in response we would follow our Information Rights Policy & Procedure (available on request) to determine whether the right should be

granted in each case. This would depend on the circumstances of the case.

You also have the right to make a complaint to the Supervisory Authority (the Information Commissioner's Officer - ICO) at www.ico.org.uk should you feel we've not handled your information in line with Data Protection Law, although they may wish to see that you have raised your complaint first through our complaints procedure.

Information security

We take your right to privacy and confidentiality seriously and have put in place both organisational and technical measures to protect your information from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to your information.

Organisational measures include staff training and education, a framework of policies and procedures, governance committees and internal audit procedures designed to monitor compliance,

restricting access to information based on a 'need to know' basis, implementing physical security measures such as ID cards, swipe access controls, lockable filing cabinets and desk pedestals.

Technical measures relate to network and security of information systems, restricting access through passwords and network permissions, maintaining anti-virus, spam filters, software updates, firewall configurations, investing in current technology and fraud prevention measures.

Notification of personal data breach

Data Protection Laws require us to inform the Information Commissioner's Office of any data breach that poses a risk to your protected rights and freedoms.

As stated above we have put safeguards and control measures in place to ensure that notification would be made without

delay. For any breach of information that poses a high risk to your data or privacy rights we'll contact you to advise you of the breach, the actions we are taking and what steps you can take to further protect yourself and reduce any risk you might face.

Additional processing

Where we capture information for purposes outside of this privacy booklet we will supply you with appropriate privacy statements explaining why we will be processing this information and the purposes we need this for.



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Watford Community Housing is a registered society (30183) and is regulated by the Homes and Communities Agency.