

Fair Processing Notice - Trinity Housing Association

July 2023

Introduction

This notice explains under what circumstances we collect information from our data subjects, what information we collect, why we collect it and whether we share this information with others, our legal basis of processing information, data retention periods, and data subject rights. During our activities, we will process personal data about you which may be held on paper, electronically, or in other formats. We recognise the need to treat this information in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information. The Fair Processing Notice applies to THA staff, Board Members, and contractors. and our service users.

About Us

Trinity Housing Association is a not-for-profit registered provider of social housing. We have two operating arms: Supported Living and Supported Accommodation. Our Registered Office is Jensen House, Shaftesbury Street, West Bromwich, West Midlands, B70 9QD.

THA is acting as both Data Controller & Processor and is registered with the ICO under registration reference (ZA304346)

Collecting Information from Data Subjects

We collect information from our data subjects under the following circumstances:

- When residents apply for housing with THA
- When residents request repairs via a social worker/scheme manager (email/telephone/phone call)
- When new employees/Board Member join THA
- When THA employs a new contractor for “repair” / “refurbishment” services to any of our properties leased by THA.

The Information We Collect

We may collect the following information about our staff (including Board Members), residents and contractors.

- Personal details such as your name, address, date of birth. age
- Contact details including phone number, home address, mobile number, e-mail addresses, previous address (including previous landlord details), rent arrears from previous tenancy & forwarding address of service users once they terminate their tenancies with us.

- Appointee Details, resident's disability details, history of challenging behaviour, criminal convictions record, self-harm and/or risk to others etc).
- DBS information
- Contractor Insurances (Employers and Public Liability)
- Contractors Schedule of Rates
- Details of Next of Kin
- Proof of Right to Work in the UK
- Other relevant information relating to employment (such as references, medical conditions including any disabilities (physical/mental) and payroll information such as bank & tax details. HMRC forms and national insurance number)
- Ethnicity & Gender
- Tenant's savings information (if savings are over £16K, tenants are classified as "self-funders").

Information from Third Parties

We may contact third parties such as care providers, social services, appointees, previous employers, Job Centre Plus, local authority and other government agencies to obtain additional information about our data subjects such as:

- Reports from previous landlords about complaints of anti-social behaviour.
- DBS information
- References

Why we need this information

- To undertake and perform our obligations and duties to our data subjects.
- To enable us to supply you with the services and information which you have requested
- To enable us to respond to your repair requests and any complaints made to us.
- To analyse the information so that we can make informed decisions and thereby improve our services and also make THA a better workplace for our employees.
- To contact you and send you details of any changes to our services which may affect you
- To contact you for your views on our services.
- To hold accurate and up to date records of our data subjects (electronically and manually) and archive/delete data in line with the statutory retention periods.

Sharing Your Information

The information you provide to us will be treated by us as confidential. 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 explicit consent (THA basis for processing personal data).

Legal Basis for processing personal data

Trinity Housing Association acting as a data controller uses "Consent", "Legal Obligations" & "Contract" as the legal basis for processing personal data of data subjects including CCTV surveillance at the office premises for the safety and security of employees.

In addition to the above, Trinity Housing also relies on "Legitimate Interests" – specifically this relates to collecting "Next of Kin" data from our current employees. This type of processing is in our own interests (Trinity Housing) & individual interests as by keeping up to date records

we are able to contact an employees' Next of Kin in the event of an emergency and also fulfil a duty of care towards them.

Protecting Your Information

When you give us information, we take steps to make sure that your personal information is kept secure and safe including:

- Ensuring all electronic devices are password protected
- Encrypting emails containing personal information when this is shared with third parties
- Storing personal information held on paper copy in locked drawers/filing cabinets or locked rooms only accessible to those that require access.
- Use "confidential waste bin" for personal data no longer required.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for it is necessary for the relevant activity, as required by law or as set out in any relevant contract we have with you. After these periods, the information will be archived or securely deleted if it is no longer required for the reasons it was obtained.

CCTV Systems & Surveillance

THA has installed a CCTV system (located in the reception area) for not only for preventing crimes but also keeping our staff employees/visitors safe. CCTV systems are in operation during business hours (Monday – Friday, 9am - 5pm) and captures images of people and vehicles. THA does not operate any covert CCTV. All data subjects (including THA staff, Board members & visitors (including our stakeholders and candidates who attend interviews) are being monitored and for this reason THA has put up a signage/notice explaining that "presence of CCTV surveillance". THA will keep a written record explaining which staff members are authorised to view the CCTV footage and for how long images will be retained – the recommended time frame is 31 days (in our case 14 days). However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated. Your personal data may be shared securely with external parties where it is both necessary and appropriate to do. THA is using "legal obligations" as the lawful basis for processing your data. Furthermore, THA has kept a written record which explains the following: a) Reasons for the CCTV system installation; b) what it is intended to capture and c) installation of this system is justified. THA will comply with "Subject Access Requests" which requires THA to make available digital images that have been captured of them.

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 subject access request to us to delete what personal data of your we hold (electronic and paper)

NOTE: TRINITY HOUSING ASSOCIATION IS A PRIVATE ORGANISATION, THEREFORE WE ARE NOT COVERED BY THE FREEDOM OF INFORMATION ACT. IF OUR STAKEHOLDERS (INCLUDING OUR RESIDENTS) WANTS TO KNOW WHAT INFORMATION WE HOLD ABOUT THEM, THEY SHOULD MAKE A DATA PROTECTION SUBJECT ACCESS REQUEST.

If you would like to exercise any of your rights above, please contact our Data Protection Officer.

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 Lane, Water Lane, Cheshire, SK9 5AF
Telephone: 03031231113 or 01625545745

Email: casework@ico.org.uk