

What is GDPR?

The General Data Protection Regulation (GDPR) was introduced into UK law on 25 May 2018. It supersedes our current data protection legislation (Data Protection Act 1998) and improves the rights of individuals to control the data held about them. GDPR requires organisations to be more transparent about the data they collect and how they use it.

WSCHA take our data protection responsibilities seriously. We only collect information needed to manage our business. We hold your information safely and only keep it for as long as is necessary.

What is a Privacy Notice?

The Information Commissioner's Office (ICO) has issued guidance to all organisations on how to implement the GDPR - this includes reviewing our reasons for collecting information and demonstrating our commitment to the confidentiality and security of this information.

A Privacy Notice is a way of communicating what information we hold, what our legal reason for collecting the information is and what we use the information for. It also lets you know what your rights are.

We have made every effort to simplify the wording of our Privacy Notice so that it is easy to understand and we have made it available online, on display in our reception areas and in our Common Rooms.

Is my information secure?

We hold your information either securely within our online systems or on paper, which is held securely within our offices. We have data protection policies and procedures in place to manage this security and we regularly test and check our procedures.

Do you share or sell my information?

We will never sell your information to other organisations. We will only share your information as needed with partners providing services to you, with your agreement or in the case of an emergency. The Privacy Notice describes the types of 'third party' organisations with whom we need to share information.

In addition to service providers, it is important that you tell us who you wish us to share information with, for example, your family members. We will not share information with family members unless you have given us written permission and their contact details.

Do I have to do anything?

No you do not have to do anything. We are legally required to make you aware of your rights under the new regulation. That's why we have made the Privacy Notice available online, downloadable, on display and available on request from our offices.

How can I check what information you hold about me?

You can request to see what information we hold about you. This is known as a subject access request. You can request a subject access request form from our offices or download a copy from the website.

Where can I find more information about GDPR?

You can find out more about the new data protection regulations from the Information Commissioners Office (ICO) website at www.ico.org.uk

How can I update my information?

You can do this by contacting a member of the Housing Team.

What if I am unhappy with the way you manage my information?

You can contact the Data Protection Team as follows.

In writing to;

Data Protection
Woodvale & Shankill Community Housing Association
Unit C5
Edenderry Industrial Estate
Crumlin Road
BT14 7EE
Tel: 028 90 741618, Email: info@wscha.org

If you have serious concerns about the way your information is being managed by WSCHA, you can contact the Information Commissioner's Office directly at ni@ico.org.uk

This Privacy Notice from Woodvale & Shankill Community Housing Association (WSCHA) tells our customers and service users how we process your personal data in accordance with our legal obligations under the Data Protection Act (DPA) and the EU General Data Protection Regulation (GDPR).

WSCHA is committed to building trust and confidence in our ability to keep your information secure and this Notice explains how we do this.

Customer Privacy Notice

WSCHA provides for, upgrades and maintains general family housing needs, sheltered accommodation for the elderly and disabled and special needs accommodation in response to defined and approved complex needs requirements.

We work with a range of organisations, as a necessary part of our work, we gather personal data from the people we provide services to and we take very seriously our commitment to the confidentiality and security of this information.

This Privacy Notice explains the basis and purposes for which we may process personal information and the rights individuals have with respect to this. In the course of our work we collect a person's name, age, address (current and previous), contact details including telephone and email, and national insurance. We may also collect Sensitive Personal Data - relating to a person's nationality, ethnicity, religious belief, gender identification, sexual orientation, marital status and disability. We gather information on residential status, employment, housing history, household type, economic status, income details, financial commitments, bank details, allowances, benefits and grants, support being received or required (name of support worker or external agency), unspent criminal convictions and third-party authority / information.

Why we gather personal information

We collect this personal information because it is a necessary part of our function as a housing provider and social landlord. We have a legal basis for this, through consent and for legitimate purposes. When a person first applies for social housing (to NIHE), the 'applicant' provides 'consent' which allows Registered Social Landlords to process personal data in connection with the application and any subsequent tenancy. Our processing of personal data is necessary for our 'Legitimate Interests' in managing a tenancy, and also those of third parties with whom we may share data (only with consent, unless allowed otherwise by law). Third parties include Contractors, NIHE, Political Representatives, Government Departments, Social Services, PSNI, Probation Service, other landlords, Utilities Companies, Courts, Pensions Companies, HMRC, NIFRS, Support agencies and Health services.

How and when we gather personal information

We collect information about current, former and potential tenants, those who live in our properties (which might include family and people associated with the tenancy) and those who access services. We collect personal information when a person applies for a home (this may include information from other landlords, the PSNI, the Probation Service, Support Services, Social Services, and Health Services), when a person signs a tenancy agreement,

when terminating a tenancy, and through ongoing communication during the time a person lives in our properties or uses our services. We do this through telephone calls, text messaging, written communication, website and email contact, advice services, processing CCTV images and at events to promote our work.

How we store and use personal information

All personal and sensitive information we hold, is treated confidentially and in a manner that ensures appropriate security, in line with our Data Protection Policy. All steps will be taken to minimise the possibility of any breach of security - ICT systems and procedures, office security and confidential destruction of all waste paper documents.

Unauthorised use of data is not permitted and staff members are trained and equipped to prevent loss and guard against breach. Information will not be retained any longer than is necessary to fulfil the purpose for which it was gathered, nor will it be transferred outside of the European Union. We use the information that is collected in order to deliver our services: to manage allocations, lettings and tenancies, process rent and service charges, provide a repairs and maintenance service, offer advice, consult and engage with customers on subjects relevant to their tenancy, handle complaints, Anti-Social Behaviour, provide support and additional services including security, health and safety. Any changes will be reflected in updates to this Notice to ensure you are kept informed.

For us to process your personal information we must have a lawful basis for processing for doing so and at least one of the following conditions must apply:

1. **Consent** – Your consent to us processing your information will be based on a clear indication from you that you are agreeable to us processing your information for a specified and clearly defined reason.
2. **Contract** – Processing your information is necessary if we have a contract to fulfil with you or if we have to take steps at your request before entering into a contract.
3. **Legal Obligation** – Processing your information is necessary in order for us to comply with common law (not including contractual obligations) or statutory obligation.
4. **Vital Interests** – Processing your information is vital in protecting someone's life.
5. **Public task** – Processing your information is necessary for the Department to perform a task in the public interest or for our official functions, and the task has a clear basis in law.

Your Rights & Access to your personal information

Under GDPR you can find out if we hold any of your personal information (including CCTV images) by completing a Subject Access Request, available in printed format and on our website. If we do hold information about you we will tell you what it is and provide you with a copy of it. You can also be provided with information about the processing (ie the purposes, which categories of data we have and how long we hold it).

Making a complaint

If you have any concerns regarding the security of the information we hold, please let us know immediately. If you wish, you can also raise the matter directly with the Information Commissioner's Office:

The Information Commissioner's Office - Northern Ireland

14 Cromac Place,

Gasworks,

Ormeau Road,

Belfast,

BT7 2JB

T: 028 9027 8757 E: ni@ico.org.uk

Subject Access Request

Under EU General Data Protection Regulation (GDPR) you are entitled to request and receive a copy of any personal data we hold about you. We can provide information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

CCTV

Some of our properties have CCTV in public areas to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself in the same manner as the above, by making a 'subject access request'.

Subject Access Request Form

You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.