



# Privacy Notice:

## How we use your personal information

**The privacy and security of your personal information is extremely important to us.**

Your contact with us generates records which may include personal information that is subject to data protection legislation.

This privacy notice explains how and why we use your personal data, to ensure you stay informed and can be confident about giving us your information. We will never sell your personal data and will only share it with organisations we work with when it is appropriate, and the privacy and security of your data is assured.

We will keep this page updated to show you all the things we do with your personal data and let you know about any key changes that affect you. In certain circumstances we may also provide an extra privacy notice, which will always refer back to this notice.

### Overview

This policy applies if you are a tenant, leaseholder, customer, use any of our services, visit our website, email, call or write to us.

The type of information we collect depends on our needs. For example, if you contact or visit us, we may only need limited information about you to deal with your query. If you are one of our customers, we may need to collect a variety of information about you to ensure that we can provide you with appropriate housing, comply with the terms of your tenancy agreement with us, or provide you with, or refer you to, appropriate support services as required. Information may include your contact details, financial information (including the receipt of benefits), or mental or physical health information (including whether you have any disabilities we should be aware of). We may also need to collect certain information to meet our statutory obligations.

We ensure that the information we hold about you is only used for specific purposes and only kept for as long as is necessary to provide you with services, deal with your tenancy, or to comply with our other statutory or regulatory obligations. We may need to share some information with third parties, such as local authorities, benefits departments, repairs and maintenance contractors, social services, other social landlords, government departments or emergency services, as required.

You also have various rights in relation to your personal data, including the right to see copies of the personal data we hold about you, or to make a complaint to the regulator, the Information Commissioner's Office.

This is only a simple overview of how we use your personal data. The rest of this notice is split into sections which we hope will make it easier to understand.

## Who are 'we'?

In this policy, whenever you see the words 'we', 'us', 'our', or 'PHP', it refers to Poole Housing Partnership Limited. Our ICO registration number is Z8469476

We are an Arms Length Management Organisation (ALMO) commissioned by BCP Council to:

1. Provide housing services to a good standard
2. Undertake property and grounds maintenance and repair
3. Manage your housing, tenancy/lease and account as your landlord
4. Collect rent and arrears
5. Investigate any worries or complaints about the service

We also provide additional optional services including:

6. Organising and assisting community events
7. Offering opportunities to be involved (resident involvement)
8. Providing welfare benefit advice and sign posting to debt agencies
9. Providing support services to assist with specific areas of your housing and personal needs
10. Adaptations made to the properties we manage
11. Selling properties

## Whose personal information does this relate to?

We collect and hold personal information about:

### Customers

This includes current, former and potential customers who live in our properties or access our support and other services, and includes members of their family and people associated with them.

### Visitors

Visitors to our website and our offices, those who email, call or write to us, including anyone who makes a complaint or enquiry to Poole Housing Partnership Ltd.

## The legal basis for PHP using your information

**According to the General Data Protection Regulations (GDPR) and the Data Protection Act 2018, PHP must have a reason to collect and use your information.**

This will be:-

- To enable us to manage the services provided;
- To check the quality of our services;
- To train and manage the workers who deliver those services;
- To help with research and planning of new services;
- Ensure that public money is spent wisely and efficiently.

There are a number of legal reasons why PHP need to collect and use your personal information. For this service the following apply:

- i. **Contract:** you have entered into a contract with us;
- ii. **Vital interests:** the processing may be necessary to protect someone's life or protect them from significant harm;

- iii. **Legal Obligation:** it is required by Housing Acts, Housing Act 1998, Anti-Social Behaviour, Crime & Policing Act 2014, Homeless Obligation Act 2017.
- iv. **Public Task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

### How do we collect personal information?

We collect information in a variety of ways. You can give us personal data by filling in forms provided by us, for example at tenancy sign-up; via PHP website, social media functions, promotions, surveys or by corresponding with us (by phone, email, letter, face to face).

We also collect information through our ongoing contact and correspondence with you, from other support agencies which relate to you, and from people associated with you such as family, friends and neighbours.

We may record calls to and from our helpdesk. At our Beech Houses office we also have CCTV cameras in public areas.

If you provide us with personal information relating to members of your family or your associates, we will assume that you do so with their knowledge and consent.

It is important that you notify us of any changes to your personal information as soon as possible so that we are able to contact you if necessary.

### What information do we hold (tenants/leaseholders)?

When you are nominated for a PHP property we obtain information to determine your suitability to take on the tenancy.

If you become a leaseholder in one of our properties, we will need to hold information for the purpose of collecting service charges and maintenance requirements.

We will receive information through your application form. We will also use information from third parties such as other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the Police, the Probation Service, support workers, social workers, mental health workers and credit reference agencies where appropriate to help us to assess your application.

We will generally require the following information from tenants and leaseholders:

- Full name including proof of your identity / photo ID;
- Date of birth;
- National Insurance number;
- Contact details, including telephone, email or contact address;
- Details of anyone authorised to act on your behalf if applicable;
- Personal details of all household residents;
- Banking or payment card details if you make payments to us;
- Benefit and Council tax information;
- Proof of housing eligibility;
- Other personal information may be collected in order to help us resolve breaches of tenancy, alleged

anti-social behaviour or suspected fraud.

- We will also take a photograph of the tenant(s) at property viewing appointment which will be inserted into the tenancy agreement.

We may also need additional information from you concerning:

- Disabilities or vulnerabilities – We use this information to tailor our service to better meet your needs. We may also use this information for safeguarding of staff.
- Health information – when we require this to support funding for adaptations made to the property you are living in. More specific details are provided if you use this service.
- Financial information – It is important that in order to ensure that arrears payments are settled quickly, therefore we may collect information to help us to work out a plan with you. In addition to provide welfare, benefits and debt advice as a free service to help you budget, pay your bills, or to apply for funding on your behalf.
- Identification – Photo ID, bank statements, payslips or income details may be used during the processing of a house sale or purchase.

We will record information whenever you contact us or use our services and we will note any action taken, for example logging repairs, and feedback from our contractors about appointments with you, so that we have a record of what happened and of our contact with you.

### **What information do we hold (visitors)?**

We will keep a record of your contact with us, whether by phone, email, in writing or in person. This may include CCTV images, recording of calls to our helpdesk, and notes of any action taken as a result of your contact with us.

For visitors to the website, we only collect statistical data about usage patterns on our website. This information does not relate to you as an individual, but provides us with detailed information of how visitors access our site, devices used and areas visited. This helps us to ensure the information we provide on our website is relevant and up to date.

For further information please also see our *website terms and conditions and Cookie Policy*.

### **What about CCTV and Photographs?**

Some of our locations, and the office at Beech House, have Closed Circuit Television (CCTV) and you may be recorded when you visit them. CCTV is used to provide security and protect both our visitors and communities. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for set period of time after which it is recorded over. PHP's *CCTV Guidance* complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices so you know when CCTV is used.

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent, which is held by the individual teams and media and communication officer.

## How do we use your information?

Your personal data will be collected and used to help us deliver activities or services or to complete a task raised at your request.

What we do with your information will depend on the nature of our relationship with you and how you interact with our various services. We use your personal information to allow us to:

Enter into, or manage any contract we have with you, including:

- Managing tenancies including collecting rent and service charges for properties and garage rental
- Ensuring compliance with the conditions of any agreement between us
- Providing repairs, maintenance and adaptations at our properties
- Providing home ownership products
- Provide care and support for elderly and vulnerable customers

Provide you with services and benefits in both our legitimate interests, including ensuring the proper management of your tenancy and giving you appropriate support:

- Offering help with accessing benefits and sign posting for debt advice
- Assisting you in the management of account charges, payments and arrears.
- Providing support services to help customers achieve their goals
- Keeping in touch to understand your needs and preferences and invite you to events
- Engaging with customers to make improvements to our products and services

Comply with our legal and regulatory obligations, and act in the public interest, such as:

- Preventing and detecting crime and resolving disputes
- Preventing and detecting fraud and money laundering
- Promoting safety and the quiet enjoyment of our neighbourhoods and communities
- Promoting equal opportunities and fair treatment for all our customers
- Meeting the obligations we owe to our funders and regulators

Under data protection legislation, certain personal information is classified as "sensitive" or "special category" personal data. This includes information relating to racial or ethnic origin, physical or mental health, sex life or sexual orientation, religious or philosophical beliefs, political opinions, membership of a Trade Union, allegations of criminal offences and criminal convictions and offences, along with biometric data such as fingerprints.

We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to understand our customers and their needs better, for example when providing accommodation for disabled persons or those with problems around substance abuse, when resolving neighbourhood disputes involving alleged criminal activity or when helping someone to access care services. We will usually process this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times when we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.

## Sharing your information

Your personal information will be kept secure and confidential. Our staff and volunteers have restricted access to personal information on a “need to know” basis.

PHP uses a range of organisations to either store personal information, or to help deliver services to you. Sometimes PHP has a legal duty to provide your personal information to other organisation, see examples below:

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| <ul style="list-style-type: none"><li>• Dorset Police;</li><li>• National Probation Service;</li><li>• Dorset Combined Youth Offending Service;</li><li>• Department for Work and Pensions;</li><li>• Immigration Compliance and Enforcement;</li><li>• Dorset Health Care University NHS Foundation Trust;</li><li>• Dorset, Devon &amp; Cornwall Community Rehabilitation Company;</li><li>• Dorset Advocacy</li><li>• Victim Support;</li><li>• Victim’s Bureau;</li><li>• Utility Companies;</li><li>• Tunstall;</li><li>• Dorset Race Equality Council</li><li>• BCP Council</li></ul> | <ul style="list-style-type: none"><li>• Citizen’s Advice Bureau</li><li>• Other landlords</li><li>• Community Mental Health Team</li><li>• Social Care Providers in Extra Care;</li><li>• Other council services;<ul style="list-style-type: none"><li>○ Financial Services,</li><li>○ Housing &amp; Community Services,</li><li>○ Social Services</li><li>○ Adult Social Care,</li><li>○ Children &amp; Young People’s Social Care,</li><li>○ Children, Young People &amp; Learning;</li><li>○ Commissioning &amp; Improvement;</li><li>○ Audit and Management Assurance.</li><li>○ Control Centre.</li></ul></li></ul> |
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We will share certain information in appropriate circumstances with our regulators, funders, purchasers or potential purchasers of our business. We will also share relevant information with others when PHP believes it is in your, or the public’s, interest to do so, such as to keep customers, staff or visitors safe, or as required by law.

In particular, please be aware:

- Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct.
- If you default on any tenancy/licence conditions, information about you may be provided to authorised debt recovery agencies, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external debt advice agency, welfare benefits advisor, the housing benefit department or the local authority’s housing advice and homelessness prevention team to make sure that benefits are paid correctly.
- We may pass data about your rent payment record to credit reference agencies. This will enable them to assist other organisations to assess your financial standing if you apply for products and services.
- We may pass your contact information to a third party to conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you. The third party will be

bound to strict terms and conditions outlined by us and will not share your data with other organisations. Should you choose not to participate in the surveys the third party will securely destroy your data.

- We may share your National Insurance Number to verify your Universal Credit application, manage these payments and to prevent and investigate tenancy and right to buy applications fraud.

When we allow third parties acting on behalf of PHP access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

### **Children's personal data**

We do not usually process data on children aged under 18 that live in our properties, as all of our tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may also receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

### **Fraud prevention**

We are required under Audit Commission Act 1998 to participate in the National Fraud Initiative (NFI) data matching exercise. For more information please contact us or visit our website for further details:

<https://www.yourphp.org.uk/residents-and-leaseholders/rent-charges/preventing-fraud/>

### **How do we secure your data?**

Information system and data security is imperative to us to ensure that we are keeping your data safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape. In addition to this, we follow a defence in-depth security model, which means that your data is protected by multiple layers of security.

Personal information is stored and managed within a variety of IT software systems which are maintained to achieve a high level of security and confidentiality. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

Our employees complete mandatory information security and data protection training at the start of their employment, and annually thereafter to reinforce responsibilities and requirements set out in our information security policies. Only those staff members and third parties who require access to your information will be able to access it.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise

the risk of unauthorised access or disclosure; when entering information on our website, you can check this is secure by right clicking on the padlock icon in the address bar.

## How long do we keep your information?

We will only use and store your information for as long as it is required for the purpose it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

PHP will retain information as stated in their Data Retention Schedule and in accordance with the Data Protection Act 2018 and General Data Protection Regulations.

## What are your rights?

You have certain rights with regard to the personal and personal sensitive information which PHP holds about you. You are able to:

- Ask us for access to the information that we hold about you
- Have your personal data rectified, if it is inaccurate or incomplete
- Request the deletion or removal of personal data unless there is a compelling reason for its continued processing, for example, if we are required to retain it for statutory purposes, or to protect our legal interests
- Restrict our use of your personal data (i.e. permitting its storage but nothing further), although in some cases we will not be able to restrict our uses of your information, for example if we are required to process it for statutory purposes or to protect our interests
- Object to certain ways we use your information
- Request that decisions are not made about you automatically through the use of technology and with no human consideration where it produces a legal or similarly significant effect on you
- Request that we transfer your information directly to a new landlord or other third party

Further information about your data protection rights appears on the Information Commissioner's website at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like further information or to exercise any of these rights, please go to the website <https://www.yourphp.org.uk/privacy/general-data-protection-regulation//> or contact the Data Protection Officer.

## Consent

We may sometimes process your data for specific purposes which require your consent. If we do this, we will always ask for your written consent. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you but this will be explained in the consent form.

Please contact us if this is the case.



## Complaints or concerns

If you have any questions in relation to this document, or how we use your personal data, they should be sent to: [comments.php@bcpcouncil.gov.uk](mailto:comments.php@bcpcouncil.gov.uk)

Or contact:

Sue Allport  
The Data Protection Officer,  
Poole Housing Partnership Ltd  
Beech House  
28-30 Wimborne Road  
Poole  
BH15 2BU  
Tel: 01202 264435

If you are unhappy with our use of your personal data, or anything in this notice, please talk to us directly so we can help to resolve any problem or query.

You also have the right to raise any concerns with the Information Commissioner's Office (ICO). They can be contacted by post:

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

By calling 0303 123 1113 or by email [casework@ico.org.uk](mailto:casework@ico.org.uk)

Their website is [www.ico.org.uk](http://www.ico.org.uk)

## Changes to our privacy notice

This privacy notice was updated following the introduction of GDPR in May 2018 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.