



## **FAIR PROCESSING NOTICE FOR OUR TENANTS**

### **Women's Pioneer Housing Ltd and the GDPR**

Under the EU General Data Protection Regulation (GDPR), Women's Pioneer Housing Ltd (WPH) are committed to protecting your data and complying with the rules and regulations set out in handling your personal data. This Fair Processing Notice outlines our privacy policy and explains to you what data we hold about you, why we hold it, what we do with it, and your rights under the GDPR.

WPH is a housing association registered with the Information Commissioners Office (ICO) as a data controller.

Our ICO Registration number is: Z5679469

WPH can be contacted using the following details:

Women's Pioneer Housing  
Third Floor  
3 Angel Walk  
Hammersmith  
W6 9HX

Tel: 020 8749 7112

Email: [customerservices@womenspioneer.co.uk](mailto:customerservices@womenspioneer.co.uk)

### **GDPR Principles**

The GDPR aims to protect the rights and freedoms of individuals in relation to their personal data. All personal data must be processed according to the following principles:

- Personal data shall be processed lawfully, fairly and in a transparent manner.
- Personal data shall be processed and kept only for relevant purposes and limited to what is necessary.
- Personal data shall be collected only for its purpose and for no other reason.
- Personal data should only be kept and stored for the intended retention period set by law or the company.
- Personal data shall be processed with mindfulness and awareness of its confidentiality and security.
- Personal data must be kept with accuracy. Any incorrect data should be corrected or erased immediately.

## **What is personal data?**

Personal data is any information that relates to an identifiable living person, directly, or indirectly, such as a name, or code.

## **What is data processing?**

Processing of your data relates to all stages from collecting, recording, storing, erasure and destruction.

## **What personal data are WPH processing?**

From the application stage and into your tenancy, WPH holds a lot of personal information about its tenants. Processing of this data is necessary for the performance in line with your tenancy agreement which you are contracted to.

This information includes:

- Personal details (e.g. name, address, contact details, NI number)
- Financial details
- Benefit information
- Lifestyle & social circumstances
- Past addresses
- Education & employment details
- Visual images, personal appearance & behaviour (passport photo)
- Complaints
- Rent payment information
- Communications with your assigned Housing Officer, Estate Compliance Officer, Scheme Manager

In addition to this, we also hold special categories of personal data subject to appropriate safeguarding, including:

- Physical or mental health details
- Marital status
- Offences & alleged offences
- Criminal proceedings, outcomes and sentences (if applicable)
- Racial or ethnic origin
- Medical and health information

If, during your tenancy, you choose to enter into a transfer application we will process data of a similar nature, in an application form, and, if applicable, ask for a copy of your medical forms.

We also hold references from your previous landlord, for the purposes of assessing tenancy sustainment. We may also ask for further third party information about:

- Carers
- GPs
- Hospital consultants

WPH will process this data to assist in the assessment of your suitability, and in the interests of your health. If applicable, we will also gather data relating to any children by asking for a copy of a birth certificate.

We also record and monitor audio calls. All calls made to WPH are recorded, except for when that call is made regarding a payment and is of a financial matter, or is made to a portable mobile device. The reason we record your calls is to document communication with you. This can assist in the future with identifying yours and other staffs needs, as well as helping us to improve customer satisfaction in the event of a complaint. Calls are recorded by our IT support & provider (Pentangle) and stored in a secure manner, on the internal Women's Pioneer servers on site. Access is only made available to our Corporate Services team when necessary. Call recordings are kept for 6 months.

We also keep CCTV footage recorded in some communal areas of our listed buildings and carparks. This assists us in monitoring any issues surrounding reports of anti social behaviour, crime, fly tipping or any concerns that arise that might affect your well being and housing experience. If your property keeps CCTV, Women's Pioneer store recordings in a secure manner on our remote server, only accessible by those with authority to do so. We keep CCTV footage permanently in case of legal proceedings. We hold and process CCTV data for the health, safety and benefit of yourself and our other tenants. We may, on a case by case basis, be legally required to share this footage with police or local authorities, following a formal, documented request.

When you visit our website, if you choose to do so, our website hosting provider may collect your IP address which may provide them with information about your location and device you are browsing on. We do not have control over this data and it is not shared with us. You will also be asked if you would like to complete an online survey, hosted by Survey Monkey. Your responses are anonymised and are unidentifiable to you. We conduct surveys for the purposes of client and resident engagement and improvement.

We also use Google Analytics, a web analytics service provided by Google. Google Analytics uses cookies to analyse how visitors use websites and assess site traffic. Our website does not use cookies to identify you from other users. This information, including your IP address is transmitted and stored by them and we do not process any of this information. If applicable, Google will provide information on how they use your information for their own purposes.

If you visit and post a comment on our social media pages (e.g. twitter), we will not use your data elsewhere unless you give us consent to do so. We use social media platforms to allow you to interact with Women's Pioneer by other means than calls or emails in the interests of you as a visitor.

If you come and visit the Women's Pioneer office, you will be asked to sign in by providing your name in our visitor's book. We do this to comply with fire and health and safety standards by monitoring who is in the building.

### **Why are WPH processing this information?**

WPH will only hold data where there is a legitimate interest to do so. For all legitimate interests we evaluate that interest compared with your rights and freedoms. When your rights and freedoms override this, WPH will not process your data. We also process your data on a contractual basis as a result of your tenancy agreement with us. It means we can assess your compliance with the tenancy agreement, as well as our obligations as your housing association. Processing your personal data also allows us to provide adequate social housing accommodation and services including:

- Letting, renting & leasing properties
- Administering and creating transfer lists (if applicable)
- Carrying out research into our services
- Providing associated welfare services, advice and support
- Maintaining our accounts and records
- Supporting and managing our employees, agents and contractors

Storing your information is also essential for us to contact you for general enquiries, or in the event of an emergency. Furthering this, we can also use your data to improve customer satisfaction, and resident engagement. When we have to protect our tenants from damage or harm, this then also becomes a safeguarding issue, and we hence also have a legal obligation to share your data with the relevant authority. We are also a member of the Homes England Agency and National Housing Federation and we are obliged to monitor and report to them regularly.

### **How WPH process and store your information**

All personal data is collected and initially processed by our staff at WPH. Data is then further processed using a number of electronic systems.

Electronic systems include:

- QL (housing management and customer relation management software)
- INVU (document management processor)
- Microsoft Office (e.g. Outlook)
- Server Drives
- Internal Intranet

WPH operates a Thin Client WYSE system, meaning all personal data is saved directly to our main encrypted servers and cannot be saved to individual personal systems. For members of staff that use Thin Client laptops, work from home, or have access to

personal data on work portable devices, every care is taken to ensure that it's contents are password protected, and encrypted.

Your assigned Estate Compliance Officer, Housing Officer or Scheme Manager may also need to communicate with you, the tenant, to carry out checks and works in line with your tenancy agreement. As a result, some of your personal details will be kept on a portable device, such as a mobile phone or tablet, belonging to the organisation. Portable devices are secured with six digit passcodes, only known by the appropriate senior member of staff and the assigned employee. Emails kept on phones are automatically synced and destroyed after:

- 1 day for staff who are office based
- 3 days for staff who go out infrequently
- 7 days for staff who are not office based and don't have routine computer access

Your rights are considered at all stages and no data will be processed unless absolutely necessary.

Any hard copies containing personal data, deemed unnecessary to be kept in paper format, are destroyed in a secure manner to ensure your confidentiality. Any existing hardcopies are kept within the remits of the WPH office, where particularly sensitive data is kept within locked cabinets. Access is only made available to appropriate members of staff.

In very extreme cases, where WPH may have to process your data in a life or death situation, your data may be processed under the legal basis of vital interest.

Where your data is processed by a third party, for example, when we pass on your contact details to a contractor to perform repairs on your building, the third party processor does so under the documented instructions of WPH, namely, the data controller. It is necessary for us to share this data to effectively manage your tenancy and we do so under contractual obligation. Your rights are considered at all stages and no data will be processed unless absolutely necessary.

### **Who will WPH share this data with?**

Sharing your data with third parties, such as local authorities, service providers, consultants, contractors, builders, and safety inspectors is necessary for us to manage your tenancy, maintain the upkeep of your home and communal areas, rent payments, and to look after your safety and wellbeing. We also share your data with ALLPAY to manage your rent payments, and, where applicable, courts, debt collectors, social services, police and other agencies. On occasion, where surveys are carried out, we may also share your information with survey consultants. If your responses are published, your prior consent will be gained.

## **Are there any cross border transfers and on what basis?**

WPH does not transfer any personal information outside of the EU/EEA or regulated countries under the GDPR. All our processors and servers are held within the EU/EEA meaning your data is stored with adequate levels of protection. If a case occurs where your personal data needs to be transferred outside of this remit, this would be evaluated in terms of whether this is a legitimate interest of the organisation. If considered necessary, transfer safeguards would be implemented.

## **How long do WPH hold your data for?**

WPH has a retention policy for how long we hold your personal data for, as recommended by the National Housing Federation. This is available upon request.

This includes:

- Tenant application forms: 6 years after acceptance
- Tenancy Agreements: Permanently
- CORE data record form: Destroyed after acceptance
- Housing benefit notifications: 2 years
- Rent statements: 2 years
- Documentation provided by other agencies relating to special needs: Duration of tenancy
- Care plans: Permanently
- Children's care plans: 75 years
- Records relating to offenders, ex offenders: Duration of tenancy
- Anti social behaviour case files: 5 years

## **What do WPH do with your information once your tenancy finishes?**

The law requires us to keep certain data included in your tenant files for specific periods after you leave WPH, in accordance with our retention policy. Former tenancy files are kept for 5 years after you leave.

If you have outstanding arrears, your personal data will be held under contractual obligation until this is paid off in full.

## **Your rights as a data subject under the GDPR**

As a tenant the GDPR sets out the following rights:

1. Right to make a subject access request.

You can ask for copy of all your personal data held by WPH. We are legally obliged to adhere to this request within 30 days, free of charge. If the request is particularly large we might request a fee and ask the ICO for more time if needed. If you make a subject access request this must be made in writing. If you are not happy with the information you receive from us then you can contact the ICO at:

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

## 2. Right to be forgotten.

If you feel WPH is processing data you did not give consent for, you can ask us to delete your personal data in certain circumstances. Women's Pioneer will stop processing, however if we can demonstrate a legal obligation for processing, in the interests of your tenancy, we can override the withdrawal. Each request will be evaluated on a case by case basis.

## 3. Right to obtain a restriction of processing.

You can also ask that data processing is restricted, meaning it is merely stored, and not used. This right can be requested when:

- Accuracy is contested
- The processing is unlawful but you would rather the data was stored instead of destroyed
- It is no longer needed for its intended purpose but it is required to be kept for verifications
- You have objected to processing but it is required for proof for erasure of data

## 4. Right to object to processing.

You can object to WPH processing your data on the basis of your situation. If we can demonstrate legitimate grounds for processing we can override the objection. If your data is being used in the following ways you can object:

- Your data is being used for direct marketing processes
- Your data is being processed for scientific, statistical or historical research purposes, unless this is in the interests of the public.

WPH does not engage in direct marketing, but on the rare occasion that we might use your data, for example, a photograph, we will explicitly gain prior consent.

## 5. Right to request rectification.

You can ask WPH to correct any inaccurate data. The source of the issue will need to be investigated and will be evaluated on a case by case basis.

## 6. Right to request data portability.

You can obtain a copy of your personal data from us in a portable format if requested, and have it transferred to another organisation should you wish.

## 7. Right to request not to be subject to significant decisions when it is based on a decision made solely by automated means.

This is with regards to when a decision is made on your data which is reached without human involvement. WPH does not do this.

If you would like to exercise any of these rights, please contact us so we can investigate and respond to you within 30 days. Should the request be particularly large we may ask the ICO for more time, in which case you will be informed of this and the reasons for it.

### **Details of our designated Data Protection Officer (DPO)**

Name: Mark Cole – Director of Resources

Email: [dpo@womenspioneer.co.uk](mailto:dpo@womenspioneer.co.uk)

### **Changes to this Fair Processing Notice**

Should we make any changes to our Fair Processing Notices in the future we will update the website so that the latest version is available.