

Keeping your information safe

(A guide to our Privacy Notice)



HELPING PEOPLE MAKE A HOME

Introduction

We need to collect, process and hold your personal information to be able to provide the services we offer.

We're registered as a data controller under the EU Regulation 2016/679 General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA') as we're responsible for deciding how we hold and use your personal information.

This leaflet explains how and why we use, store and share your information.

What personal information we collect and store

We will collect, store and use the following types of personal information about you:

- **Personal details** such as your name, gender, date of birth, National Insurance number, identification documents, photographs, contact details and contact preferences;
- **Information you have provided in your application for housing**, including references, pre-tenancy assessments, housing history and income details
- **Details of other people who live with you**
- **Financial details**, including bank details, benefit support, rent account details and income and expenditure assessments
- **Complaints of anti-social behaviour**
- **Complaints about our services**
- **Repair logs**
- **Information to help us manage your tenancy**
- **Details of any support received by you**, including care packages and plans, and details of support providers
- **CCTV images**

We may also collect, store and use the following types "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, trade union membership and political opinions
- Information about your health, including any physical and/or mental health condition and disabilities
- Information about criminal convictions, criminal offences or court proceedings.

How we collect personal information

We collect, store and hold personal information relating to our customers from the following sources:

- you, our customer
- your previous landlord
- your named referees
- other agencies such as the local authority, the police, emergency services, probation, other Housing Associations, the NHS, health professionals, drug and alcohol services and charities.

We may collect information in the following ways:

- on a paper or online form
- by phone or text message
- by email
- over CCTV
- in person by a colleague from Leeds Federated, or one of our partners.

Why we collect information about you?

We will use your personal information to help us provide and improve our support to you. We need to collect and hold information about you, so we can:

- deliver public services
- confirm your identity to provide some services
- contact you by post, email or phone
- understand your needs and strengths to provide the services that you request
- understand what we can do for you and inform you of other relevant services and benefits
- get your opinion about our services
- keep your customer record up to date
- help us to build up a picture of how we're delivering services to you and what services our customers need
- undertake statutory functions efficiently and effectively
- meet our statutory obligations, including those related to diversity and equality.

We may not be able to provide you with a service or support unless we have enough information, or your permission to use that information.

How we use your information

We will process your information for the following purposes, so we can:

- make sure you get the service you request

- monitor and improve how we deal with your request
- contact you
- provide services and benefits that match what you need
- meet our legal obligations
- support law enforcement, where needed
- prevent and detect fraud or crime;
- process financial transactions including grants, payments and benefits which may involve the council, or other government bodies, e.g. Department for Work and Pensions (DWP)
- protect people from harm or injury
- analyse data to help us plan future services.

We rely on at least one of the following legal bases for processing personal information:

- consent has been obtained
- processing is necessary for the performance of a contract
- processing is necessary for compliance with a legal obligation or
- processing is necessary for our legitimate interests.

We're working to make our record keeping more efficient to help us to provide relevant services quicker and more efficiently.

We will use the information you provide to meet General Data Protection Regulation (GDPR) and the Data Protection Act (DPA). We aim to keep your information accurate and up to date and not keep it for longer than necessary.

We may need to keep your personal information even if you're no longer receiving our services. This is to make sure we meet legal and regulatory obligations. We may also need to keep your information to resolve disputes, maintain security, prevent fraud or to collect outstanding debts owed to us.

Automated Decision Making

We won't make decisions that have a significant impact on you based solely on automated decision-making.

Information sharing

We may need to pass your information to other people and organisations that provide services on our behalf, such as contractors that may need to visit your home. These providers are obliged to keep your details securely and are only allowed to use them to fulfil your request.

We may also share information with other partners either to comply with a legal obligation, or where permitted under GDPR and the DPA, e.g. where it would help prevent or detect crime

We may disclose information to protect someone from the risk of harm. The following are examples of who we may share information with:

- our contractors and agents (for example our legal advisors)
- other social landlords
- local authorities and government departments
- emergency services or support services
- financial organisations
- central government
- auditors
- survey and research organisations
- health authorities
- enquirers and complainants
- security organisations
- health and social welfare organisations
- Homes England
- Regulator of Social Housing
- probation services
- charities and voluntary organisations
- courts and tribunals
- professional bodies
- insurers
- employment and recruitment agencies
- credit reference agencies
- debt collection agencies
- landlords
- press and the media
- Housing Ombudsman Service.

We will never pass your information to other organisations for marketing or sales purposes or for commercial use, unless you have given us your permission.

How we protect your information

Our aim is to only ask for relevant or necessary information about you. The information you share with us will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or shared with anyone who shouldn't see it.

We have policies and procedures in place and provide training to colleagues who handle personal information. If colleagues misuse or don't look after your personal information properly, we will take disciplinary action.

We will dispose of paper records or delete your electronic personal information in a secure way.

We only transfer your information overseas in individual cases when we have your consent or where we're obliged to do so by law.

CCTV

We have CCTV systems in some of areas used by members of the public to help with public safety reducing crime. Where CCTV is installed we have signs to let you know. The signs include details of who to contact for further information.

We will only share CCTV images with others who will use the images to prevent or detect crime. CCTV images will not be released to the media for entertainment purposes or shared on the internet.

Images captured by CCTV will not be kept for longer than necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the images.

Using our website

Our website will record personal information if you contact us through that and leave your details for us to get in touch with you.

Customers of Leeds Federated use our 'My Account' Portal to view tenancy information. My Account users will sign up to a separate Privacy Policy which sets out how we'll process your information in Portal.

For more information about how we collect your personal data through our website, please see our privacy notice for website users at <https://www.lfha.co.uk/privacy-policy>

Your rights to access your information

By law we're required to give you access to the personal data we hold about you. If we do hold information about you, we will:

- give you a description of it
- tell you why we're holding it
- tell you who it has been shared with
- let you have a copy of the information in a way that's easy to understand.

You may also have the right for your personal information to be shared electronically with another organisation in certain circumstances.

You can request access to the information we hold about you at any time by contacting us. Although a request may be made through various means, including verbally or via social media, you'll need to submit either a Subject Access Request or

Third Party Access Request to us along with one of the following so we can deal with your request:

- a detailed description of what information you are requesting; and
- proof of identity.

You won't need to pay a fee to get your information but we may charge a reasonable fee if your request is clearly 'unfounded' or 'excessive'.

Subject Access Request – this is to be made by the person whose information we hold

Third Party Access Request – this is to be made by a third party for example a relative, friend, support worker etc.

Once we've received your request, we'll check that the person submitting the request is the person to whom the information relates. We'll then get back in touch with you within one month of receiving your request. If there's a lot of information, it may take up to two months to share it with you, but we'll let you know if it will take more time.

Your rights

If you believe that any of the personal information we hold about you is incorrect, you have the right to ask us to change that information at any time.

You may also have the right, in certain circumstances, to request that we delete your personal information or to ask us to stop processing your personal data. This may cause delays or stop us from delivering a service to you. Where possible, we'll try to meet your request but sometimes there may be legal reasons why we need to carry on processing or holding your information.

If we're processing your personal information based on your consent (e.g. as part of our marketing or promotional activities or to make a voluntary referral to an external agency), you have the right to withdraw your consent at any time.

If you need any further information about your rights please contact us using the details at the end of this document.

Changes to this privacy notice

We will continually review and update this privacy notice to reflect changes in our services and feedback from customers, as well as to comply with changes in the law. The date on this document shows when the document was last reviewed.

Complaints

We take complaints we receive very seriously. If you think how we collect or use personal information is unfair, misleading or inappropriate let us know. You can

make a complaint at any time by contacting us using the details at the end of this document.

You also have the right to make a complaint about how we process your personal information to the Information Commissioner's Office who can be contacted at the following address:

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

Contact us

- E-mail us: CustomerService@lfha.co.uk
- Write to us: Leeds Federated Housing Association, The Tannery, 91 Kirkstall Road, Leeds, LS3 1HS
- Phone us: 0113 386 1000

Our Data Protection Officer is Lee Welsh, who can be contacted via the phone number or address listed above.

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