



PRIVACY NOTICE

How we use your personal information

Identity and contact details of Controller

Portsmouth Churches Housing Association Ltd (PCHA) is a controller of personal information for the purposes of the General Data Protection Regulation (GDPR). Our contact details for the data protection purposes are as follows:

Head Office, 20 Fratton Road, Portsmouth, Hampshire, PO1 5BX. Telephone 023 92 297877

The individual responsible for data protection compliance at PCHA is Emma Adams. They are contactable by phone 023 92 297877 or emmaadams@pc-ha.co.uk

The Association's Registration Reference is ZA351569

Purpose of this Privacy Notice

This Privacy Notice tells you what to expect when PCHA processes personal information. It applies to information about service users in our hostels and tenants in General Needs Properties. It tells you about the purposes for which we may process your personal information and the legal basis for the processing ('processing' includes us just keeping your personal information).

Why do we collect and store personal information?

PCHA needs to collect, process and store personal information about you and other household members (when you provide information about household members, we assume that you do so with their full knowledge and consent) in order to operate as a registered provider of housing and deliver efficient and effective services.

Legal basis for processing

Where possible, we will always try to get your consent (i.e. agreement) to us processing your personal information. Our residents are asked to sign a data protection consent form when they move in. The consent form sets out the organisations and type of organisations we often have to share personal information about residents with.

Under the GDPR, consent is a legal basis for processing personal information.

Where we cannot get consent, there are other reasons why we can process your personal information under the GDPR:

- Legitimate interests: where is in our legitimate business interests as a social landlord to process your information we can do that so long as we do not interfere with your fundamental rights or freedoms.
- Where we are under a legal obligation or an obligation under a contract to process/disclose the information
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person

Some personal information is treated as more sensitive (for example information about health, sexuality, ethnic background etc).

The legal basis for processing personal information is more limited. The reasons we can use are:

- Your consent
- Where we need to protect the vital interests (i.e. the health and safety of you or another person)
- Where you have already made your personal information public
- Where we or another person needs to bring or defend legal claims
- Substantial public interest grounds

Information we may hold about you and how we use it

The information we hold on our records concern our relationship with you. For example:

- We hold names, date of birth, national insurance numbers and information about your previous housing circumstances to assess housing applications and help prevent tenancy fraud.
- We hold contact details for you so we can communicate with you by your preferred means
- We record information about your needs (for example if you have a social worker, if you have special needs, require large print or translated text) to ensure that we take account of any support needs in our dealings with you and to improve our communications with you.
- We record information to enable us to provide housing management services. For example, we record reports of anti-social behaviour, complaints; change in circumstances (for example starting work, change in benefits) and information about housing options.
- We keep financial records about the amount of money you have paid us, any amount(s) outstanding and action taken to recover money you owe.

- We may capture your image on our CCTV systems in the hostels. Any CCTV recordings will be held in accordance with our CCTV Policy before being erased.
- We record the findings of our questionnaires and other research to help us improve our service to customers. The information you provide will be anonymous unless you agree that we can use your details.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we process this information so we can deliver services to you. Generally, information we hold will have been provided by you (on application forms or when we communicate with you), but we may also hold information provided third parties where this is relevant to your housing circumstances e.g. from social workers and health professionals (such as doctors, occupational therapists).

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

How we manage your personal information

We process your personal information in accordance with the principles of the General Data Protection Regulation ('GDPR').

We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes.
- Kept up-to-date, accurate, relevant and not excessive.
- Not kept longer than is necessary.
- Kept Secure.

Access to personal information is restricted to authorised individual on a strictly need to know basis.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure that your details are accurate.

We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

Periods for which we will store your personal information

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

Sharing your personal information

Normally, only PCHA staff will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties for the purposes as outlined, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the GDPR. Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share information as follows:

- To comply with the law (e.g. the police, Inland Revenue, Council Tax Registration Officer, Social Security Fraud Act) or a court order
- Where there is a clear health or safety risk to an individual or members of the public, evidence of fraud against PCHA other irregular behaviour or a matter PCHA is investigating
- In connection with court proceedings or statutory action to enforce compliance with tenancy conditions (e.g. applications for possession or for payment of Housing Benefit/Universal Credit direct)
- Where PCHA has entered into a formal protocol with the police or a local authority department
- Providing the name, address and contact number of a resident to contractors or other agents providing services on PCHA's behalf
- Providing the name of a resident and the date of occupancy to gas, electricity and water companies
- Providing information anonymously for bona fide statistical or research purposes, provided it is not possible to identify the individuals to whom the information relates
- Information required by the Regulator of Social Housing when monitoring PCHA's activities in its capacity as the regulator of housing associations.
- To protect the vital interests of an individual (in a life or death situation)

Your rights under the GDPR

You have a number of rights under the GDPR:

Access to personal information

Under the GDPR, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is known as a 'subject access request' (SAR). SARs need to be made in writing (we have a subject access form you can use for this purpose), and we ask that your written request is accompanied by proof of your identity. We have one calendar month within which to provide you with the information you have asked for (although we will try to provide this to you as promptly as possible).

Following your SAR, we will provide you with a copy of the information we hold that relates to you. This will not generally include information such as repairs or details of contractor visits as this is not considered personal information.

Rectification

If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting emmaadams@pc-ha.co.uk

Erasure ('right to be forgotten')

You have the right to ask us to delete personal information we hold about you. You can do this where:

- The information is no longer necessary in relation to the purpose for which we originally collected/processed it
- Where you withdraw consent
- Where you object to the processing and there is no overriding legitimate interest for us continuing the processing
- Where we unlawfully processed the information
- The personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- To exercise the right of freedom of expression and information;
- To enable functions designed to protect the public to be achieved eg government or regulatory functions;
- To comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
- For public health purposes in the public interest;
- Archiving purposes in the public interest, scientific research historical research or statistical purposes;
- the exercise or defence of legal claims; or
- where we have an overriding legitimate interest for continuing with the processing.

Restriction on processing

You have the right to require us to stop processing your personal information. When processing is restricted, we are allowed to store the information, but not do anything with it. You can do this where:

- you challenge the accuracy of the information (we must restrict processing until we have verified its accuracy)
- You challenge whether we have legitimate interest in using the information
- If the processing is a breach of the GDPR or otherwise unlawful
- If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

We must inform you when we decide to remove the restriction giving the reasons why.

Objection to processing

You have the right to object to processing where we say it is in our legitimate business interest. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights or the processing is necessary for us or someone else to bring or defend legal claims.

Withdrawal of consent

You have the right to withdraw your consent to us processing your information at any time. If the basis on which we are using your personal information is your consent then we must stop using the information. We can refuse if we can rely on another reason to process the information such as our legitimate interests.

Right to data portability

The right to data portability allows you to obtain and reuse their personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. The right only applies to personal data you have provided to us where the reason we are relying on to use the information is either your consent or for the performance of a contract. It also only applies when processing is carried out by us using automated means.

Changes to this Privacy Notice

We keep our privacy notice under regular review and you will be notified of any major changes to this policy.

Further information

For further information on how to request your personal information and how and why we process your information you can contact emmaadams@pc-ha.co.uk
The Information Commissioner (ICO) is also a source of further information about your data protection rights. The ICO is an independent official body, and one of their primary functions is to administer the provisions of the GDPR.

You have the right to complain to the ICO if you think we have breached the GDPR. You can contact the ICO at:

**Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF 0303 123 1113 / <http://www.ico.org.uk>**