# Greater Easterhouse Common Housing Register

# **Fair Processing Notice**



The Greater Easterhouse Common Housing Register is made up of Calvay Housing Association, Easthall Park Housing Co-operative, Gardeen Housing Association, Lochfield Park Housing Association and Wellhouse Housing Association.

Each member of the group is known as a "data controller" and is registered with the Information Commissioner. Each member processes personal information in line with the General Data Protection Regulation which came into force on 25th May 2018.

## How We Collect Information About You

We collect information about you when you submit an application form to the Greater Easterhouse Common Housing Register. We also collect information about you when you directly contact us, and annually at our Review.

We may collect information about you from any agency which you make reference to for supporting information. This includes, but is not limited to;

- Your current landlord, and previous 5 years of landlords e.g. Registered Social Landlords, Local Authority, Letting Agencies and Private Landlords.
- Support agencies which you state that you use e.g. Local Authority Homeless Services, Social Work Departments.
- Charities which you state that you use e.g. Woman's Aid, Shelter, and Citizens Advice Bureau.
- Other agencies e.g. Armed Forces, Home Office, Local Councillor, Police, Scottish Prison Service.

#### What Information Is Held?

We may collect the following personal information about you;

- Personal details: name, address, date of birth and national insurance number.
- Identity details: disability, ethnicity, sex, nationality (including immigration status).
- Contact details: email address, home telephone number and mobile telephone number.
- Household composition: details of existing accommodation arrangements of those seeking accommodation with you, (including access/custody details) and any other persons living in the household.
- Further information: 5 years address history, care and support provisions, home ownership details, marital status, medical details (including pregnancy), relationship to CHR member's staff and/or Management Committees and signature.
- Convictions: unspent criminal convictions and convictions under the Sex Offenders Act 1997.

# Why Is My Information Stored?

We need to store your personal information to allow us to be able to:

- Process and manage housing applications.
- Sign up new tenants to suitable properties.
- Meet our legal obligations including information we have to provide to regulators and statutory authorities.
- Adhere to statutory regulation and providing yearly returns and statistics.
- Reply to enquiries and contact all applicants when required.
- Issue service information e.g. a new landlord joining the CHR.

### How Is My Information Stored?

The information that we receive from you, other landlords, and any relevant support agencies will be held in electronic form on our common SDM Housing Software system.

The CHR landlord which receives your application form and supporting documents will process them onto the electronic CHR. Your paper copies will then be securely destroyed.

All computers are kept in a secure location and are password protected. Access to our electronic files kept on the shared network is controlled by user log in and passwords, making access to data only available to those who need to use it.

Our computer systems are located in each member's offices, but occasionally we may use computers offsite. However, they will at all times remain secure and under our control.

We will keep your personal details for no longer than necessary. Once the information is no longer required for the lawful purpose it was obtained it will be destroyed.

#### Who Can Access My Information?

Staff of the participating landlords will have access to your information on an electronic SDM Housing Software system.

Only the landlords that you select will process your information. However, all member organisations will have access to your personal information on the CHR.

Should another RSL join the CHR, staff of that RSL will have access to your personal information. In this event, we shall write to you to notify you of any new additional RSL, and give you the opportunity to include that RSL in your selections.

#### Who Can Access My Information: Persons Acting On Your Behalf

If you would like someone to deal with your application on your behalf, please find a consent form for this on our website or request this from the office. This allows you to grant a named person permission to discuss specific, or all of your personal data with any of the member landlords as required.

We will not share information with anyone who claims to represent you unless we are satisfied that you have appointed them, or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity, or check that we have your approval to deal with them.

# **Third Parties**

CHR participating landlords may give third parties access to our electronic files. These parties are called "data processors" as they are processing data on behalf of the Association. Although Data Controller and Data Processor are two separate entities, we are required to ensure all third party access given is compliant with GDPR principles. To this affect each participating landlord will have third party access agreements in place.

The following organisations may be given controlled access to our electronic network for reasons of security, maintenance, or any specific purposes outlined in their third party agreement:

- IT maintenance/support contractors.
- SDM Housing Software providers.
- User and file system software providers.

#### Who Else Is This Information Passed To?

All personal data we process is processed by our staff in the UK. Your information may be passed to;

- Your current or previous landlord to obtain a tenancy reference,
- Home Office to confirm your immigration status.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

# How Long Is My Data Kept?

We review our data retention periods regularly and will only hold your personal data for as long as necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We shall keep your information for the following periods:

- Current applications: duration of your application and 1 year after your application is cancelled.
- Applicants rehoused out with the CHR: 1 year following notification from you that you have been rehoused, or 1 year from application being cancelled at the Annual Review.
- Applicants rehoused within the CHR: The landlord that you have been rehoused with shall keep your personal data in your house file for the duration of your tenancy. Your personal information will be removed from the CHR after 1 year, at which point no other landlord shall have access to your information.

#### **Your Rights**

You have the right at any time to:

- Ask for a copy of the information about you held by us in our records;
- Require us to correct any inaccuracies in your information;
- Make a request to delete what personal data of yours that we hold;
- Object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact any of the offices detailed below.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioners' contact details are noted below:

The Information Commissioner's Office- Scotland 45 Melville Street Edinburgh EH3 7HL Telephone: 0303 123 1115 Email: Scotland@ico.org.uk

CHR Landlord Details	
Calvay Housing Association, The Calvay Centre, 160 Barlanark Road, Barlanark, Glasgow, G33 4RE Tel: 0141 771 7722 Email: enquiries@calvey.org.uk	Data Controller No: Z4998027 Scottish Charity No: SC039234 Scottish Housing Regulator No:HAC80 Financial Conduct Authority No:2194RS
Easthall Park Housing Co-operative The Glenburn Centre, 6 Glenburnie Place, Easthall, Glasgow, G34 9AN Tel: 0141 781 2277 Email: housing@easthallpark.org.uk	Data Controller No: Z5655541 Community Benefit Society No:2409R(S) Scottish Housing Regulator No:HAC238 Financial Conduct Authority No:2409RS
Gardeen Housing Association 32 Garlieston Road, Barlanark, Glasgow, G33 4UD Tel: 0141 771 9590 Email: info@gardeen.org.uk	Data Controller No: Z6024936 Scottish Charity No: SC037681 Scottish Housing Regulator No:HAC214 Financial Conduct Authority No:2326RS
Lochfield Park Housing Association 37 Drumlanrig Avenue, Easterhouse, Glasgow, G34 oJF Tel: 0141 771 2228 Email: info@lochfield.co.uk	Data Controller No: Z5688075 Scottish Charity No: SC037694 Scottish Housing Regulator No: HAC268 Financial Conduct Authority No:2444RS
Wellhouse Housing Association The Hub, 49 Wellhouse Crescent, Glasgow, G33 4LA Tel: 0141 781 1884 Email: info@wellhouseha.org.uk	Data Controller No: Z5916557 Scottish Charity No: SC036552 Scottish Housing Regulator No: HAC281 Financial Conduct Authority No:2469RS