

## **Victory Privacy Notice (for Residents) under the General Data Protection Regulation**

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### **What is this leaflet about?**

This privacy notice gives you information on how Victory Housing Trust processes and protects your personal information as a current or former resident in accordance with current data protection legislation.

We will regularly review and make necessary changes to the services and information handling processes when you, the law or the Information Commissioner's Office (ICO) request such changes.

This privacy notice was last updated in December 2018

### **Who are we?**

Victory Housing Trust is a Registered Provider regulated by the Regulator of Social Housing.

Our normal activities can be summarised as

- providing affordable and other types of housing
- property and grounds maintenance, repair and improvements
- managing your housing, tenancy/lease and account as your landlord
- offering opportunities to be involved

We also provide additional services including

- organising and assisting community events
- providing welfare, benefits and debt advice
- adaptations made to the properties we manage

In this notice, whenever you see the words 'we', 'us', 'our', or 'Victory' it refers to Victory Housing Trust. Our ICO registration number is Z1640468.

### **Why do we collect your personal information?**

We collect personal information for many reasons, essential to discharge our responsibilities as a registered provider, including providing you with services to maintain your property and tenancy.

This may include the following

- to check your identity when you contact us
- to record and contact you regarding payments you make to Victory
- to administer services Victory is providing to you
- for our own internal administrative purposes
- to provide you with advice and support that you have requested or been referred to
- to manage your communication preferences
- to conduct surveys, research and gather feedback to improve Victory's services and user experiences

- to comply with applicable laws and regulations and requests from statutory agencies

If we wish to process your information for reasons other than those stated we will obtain your consent prior to proceeding.

### **What personal information do we collect?**

- your full name
- contact details (including your postal address, telephone number(s) and email address)
- date of birth
- national insurance number
- your bank details, if applicable
- records of your correspondence and engagement with us
- images, video and/or audio recordings
- other information you share with us
- housing benefit and/or universal credit details
- if you have had any help from our Tenancy Support Team
- if you have been involved in any anti-social behaviour instances we are aware of
- Special Category Data

We may collect information that could reveal your race; ethnic origin; political beliefs; religion; trade union membership; health; sex life; or sexual orientation. We only collect this information where you have given your explicit consent, it is necessary, or you have deliberately made it public.

Most of the information collected will be provided by you when you apply to become a Victory resident but we may also be given information from Local Authorities, Department of Work and Pensions, and other agencies we may be in contact with.

We do not normally process data on residents under the age of 18 that live in our properties. However, we will record basic information, 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 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

### **How do we use your personal information?**

When processing your information for requests and sharing, storing and protecting your personal information, we will ensure we do so with honesty and respect. We will comply with data protection laws and work in partnership with you and the ICO when processing your information.

Victory Housing Trust has certain obligations under the law when we offer you a tenancy with us. The information we hold allows us to perform our functions as a Registered Provider and we will need to process your information because of your specific relationship with us.

We will keep all your information including notes, letters and information given to us about you in a confidential record that is specific to you. This is stored on our Contact Management System, and, in some cases, in paper files. We may also store your information in other electronic formats. This information is to help provide necessary advice, guidance and support. We take information security very seriously and access to personal information is restricted.

When you provide any special category data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this privacy notice. Being unable to process this information may mean we are unable to provide all or parts of the services you have requested from us.

Calls to and from Victory Housing Trust are recorded. These recordings are used for training purposes, quality assurance, complaint investigations and to make further improvements to the service we provide to you.

Where there is CCTV and audio equipment at Victory Housing Trust's premises relevant signs will be displayed. These recordings are used for security purposes and safety measures.

To ensure that our services meet a high standard of quality, resident files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors who are bound by confidentiality policies.

We may use your data for statistical reports. These statistics will not include any information that could be used to identify any individual.

### **Who do we share your personal information with?**

Limited information will be shared with our repairs and maintenance contractors to enable them to contact you and in order to keep both you and them safe when they visit.

We may pass your name to other agencies who could assist you in maintaining your tenancy with us or other difficulties you may have.

We may use third-party suppliers to manage mailings and for credit references and payment collection.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a contract/legally binding agreement entered into between Victory Housing Trust and the supplier.

We are obligated to inform utility companies when a resident moves in or leaves one of our properties and to provide them with a forwarding and/or previous address.

We are unable to discuss any personal information or details of your tenancy with anyone other than yourself unless

- you are with the person and give us authority to speak to them
- we have written authority from you
- we have been provided with a registered and valid Power of Attorney.

Where we are legally required to do so we will share information in the following circumstances

- prevention or detection of crime
- apprehension or prosecution of offenders
- assessment or collection of tax or duty owed to customs and excise
- in connection with legal proceedings
- to comply with the law

### **How long do we keep your personal information?**

We will keep the data we hold for as long as we need it to deliver Victory services and legal responsibilities.

If you are no longer a resident and your rent account has been cleared we will delete, in accordance with *our retention policy*, all information other than your name and the dates you were a Victory resident.

If you are no longer a resident but there is still an outstanding amount on your rent account, we may keep data for longer. If we are unable to make arrangements with you directly to clear this amount, we may pass your details to a debt collection agency. Once this has been done, we will delete, in accordance with *our retention policy* all information other than your name, the dates you were a Victory resident **and** your payment history.

Once the retention period has expired the information will be confidentially disposed of or permanently deleted.

### **How do we keep your personal information up to date?**

- when you contact us we may ask you if certain information is up to date.
- if you have told us of additional support needs we will check these regularly
- if you have a *letter of authority* (giving permission for someone to talk to us on your behalf) we will ask for confirmation regularly.
- from time to time a Household Survey will be sent to all tenants to ensure information is correct and up-to-date

### **Your Rights under GDPR**

You have many rights under data protection legislation including, in certain circumstances

- to ask us for *access to information* about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to 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
- to 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
- to object to certain ways we use your information
- not to be subject to decisions made automatically through the use of technology and with no human consideration where it produces a legal or similarly significant effect on you
- to 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 wish to make a Complaint**

If you have any complaints about the way in which we have used your data, please get in touch with us. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AD (0303 123 1113). Alternatively you can visit the ICO website <https://ico.org.uk/>

### **If you wish to Contact Us**

If you have any questions about this notice, would like more information or want to exercise any of the rights above please contact us by

- emailing [DPO@victoryhousing.co.uk](mailto:DPO@victoryhousing.co.uk)
- writing to the Data Protection Team, Victory Housing Trust, Tom Moore House, Cromer Road, North Walsham NR28 0NB

If you would like this information in Braille, large print, audio or a different language please contact us on 0330 123 1860 or email us at [info@victoryhousing.co.uk](mailto:info@victoryhousing.co.uk).