

Group Privacy Notice

Community Campus 87 Ltd needs to process personal data in order to deliver our services to you:

To provide, manage and develop affordable housing.
To provide property management & property maintenance services.
In the provision and management of support services.

We are committed to treating your information securely, with respect and in line with data protection law.

This privacy notice tells you what to expect when Community Campus processes your personal information. It applies to information about housing applicants, residents and other service users. This is the main privacy notice for Community Campus. It is important for you to read this policy in full to understand what information we hold about you, how we may use it and your rights in relation to your data. However, we have also produced a summary version.

We keep our privacy notice under regular review and we will place any updates on our website.

For further information you can contact the Data Protection Officer as follows:

The Data Protection Officer

Community Campus 87 Ltd

76 Brunswick Street

Stockton

TS18 1UU

dpo@cc87.co.uk

For independent advice about data protection, privacy, e-privacy and data sharing issues, you can contact the Information Commissioner. (Lots of useful information is accessible on their website):

Information Commissioner,

Wycliffe House, Water Lane,

Wilmslow

Cheshire, SK9 5AF

Phone: 0303 123 1113

Email: casework@ico.org.uk

Website: www.ico.org.uk

What Information do we collect about you and how is this used?

We will only collect personal information when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this.

Most information we hold will be collected from you but we may also obtain this from third parties such as the local authority, your doctor (or other health professional), a previous landlord or other relevant community partner. In addition, we may also obtain information from publicly accessible sources or engage the service of market research organisations to validate, or where appropriate, enhance the information that we hold.

We collect information from you (as applicable):

To prioritise and assess housing applications, service eligibility and complete tenancy sign-ups

We will need your name and contact details (including telephone numbers, email addresses and details of anyone you may choose to represent you) for use across the organisation and by our contractors, suppliers and partners.

We will collect detailed personal information about you and other household members*, including age, sex, date of birth, ethnicity, national insurance number, income and benefits details, employment status, gender identity, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, nationality, caring responsibilities, access to financial services, such as banks and credit unions, bank details, benefits, council tax, medical information, details of any unspent criminal convictions.

*When you provide information about household members we assume that you do so with full knowledge and consent.

Provision of some of the information requested by us is part of a 'contractual requirement'. Without this information, we will be unable to accept an application for services. For example, we cannot see if you are eligible for a tenancy or check that an application is not fraudulent without being able to verify your identity. Please speak to us with any concerns.

Where enquiries relate to household members, it is in our legitimate interests to know who will be living in our premises to, check that accommodation offered is adequate for current and near future needs of the household, to check that household members' needs are being met and to ensure that the local community will have quiet enjoyment of their homes.

To manage your tenancy or lease:

Up to date details (telephone number and email addresses) so we can reach you when we need to discuss issues pertaining to your tenancy or lease, e.g. income collection, essential servicing, access for maintenance and improvements, if we need to arrange a home visit or to contact you in the event of an emergency or to enforce the terms of your tenancy/lease.

We will also use your contact information to tell you about changes to Community Campus and to resolve or investigate complaints or housing management issues such as antisocial behaviour.

Details of any change in circumstances (e.g. if you have a medical need that means your housing requirements need to be re-assessed we would ask you for supporting information about your change in health needs) or to effect any changes to your tenancy (e.g. if you want to change your name on our records we'll ask you for a copy of your marriage or deed poll certificate).

We will hold records of all our contact with you, your contact with us, and any contact from third parties representing you or about you.

Financial records about the amount of money you have paid us, any amount(s) outstanding and associated recovery action. Depending on your method of payment, we may hold your bank account details.

We may hold information about your history, for example regarding credit status or offences, if we need it to look after our staff, business or anyone else.

Details relating to the repair, maintenance and servicing requirements of your home (although this information will not necessarily constitute your personal data).

Provision of the information is a 'contractual requirement'. Without this information, we may be unable to manage your services. For example, we cannot consult with you about changes to your service if we do not hold your contact details. Please speak to us with any concerns.

Where enquiries relate to household members, it is in our legitimate interests to know who is living in the premises, to check that accommodation remains adequate for current and near future needs of the household, to check that household members' needs are being met and to ensure that the local community has quiet enjoyment of their homes.

To meet your needs in our service delivery

To ensure our services are accessible, that we take account of any support needs in our dealings with you and to improve our communications with you. For example, if you are involved with a carer, social worker or other advocate, if there are considerations we need to apply when we visit you at home, if you need large print or translated text. When profiling you for services and to target our resources. Where processing information about you or your household members, we may have a legal or contractual obligation to process this information for example to provide inclusive services.

It is also in our legitimate interests to ensure that service delivery meets the needs of our service user and their household.

To prevent fraud and illegal sub-letting and to confirm eligibility for housing

We will ask for proof of ID and take your photograph from time to time, e.g. Tenancy Sign-ups or subsequent Tenancy Audits, when the housing composition changes or a reasonable period of time has passed (this applies to all household members over the age of 18)

Processing for the purpose of fraud prevention is required in order to meet our legal obligations. Therefore if we are unable to verify your identity we may not be able to provide services to you.

To assist with personal security and prevention and detection of crime

We may capture your image on CCTV systems if you visit our offices or community facility which is covered by this facility.

Processing of this information may be required to meet Community Campus 87 Legal obligations and our legitimate business interests around health and safety and crime prevention.

When you engage with our additional guidance, advice and support services

We may hold information about your education, job history and skills and experience, or if we support you to improve your financial circumstances, we may hold detailed information about your household income and expenditure.

If you ask us for care and support requirements we will hold detailed information about your needs and your family's needs and where relevant, records of payments for the services provided to you.

Provision of information requested by us may form part of a 'contractual requirement'. Without this information, we may not be able to provide this service. We will make it clear at the point of data collection whether the information is voluntary.

Where processing also concerns household members, it is in our legitimate interests to ensure that we are meeting the needs and expectations of all service users.

To understand how we're performing

It is in our legitimate interests to understand how we are performing so we can meet our mission statement and objective.

There may also be a legal obligation for us to process the information or to demonstrate to our regulator that we are fulfilling our obligations, for example around anti-discrimination laws.

We also use your personal information in the following ways:

Keeping in touch with you, understanding your needs, and inviting you to events.

It is in our legitimate interests to communicate with you and keep you up to date with news and events in order to meet our objectives around social inclusion and helping to build communities.

Prevention and detection of crime, and quality management.

We do this to meet our legal obligations.

Meeting our legal obligations including the requirements of our founders or regulators.

This is a legal obligation on Community Campus 87 Ltd.

Special categories of personal data

As well as personal information (such as your name, address and date of birth) we may collect sensitive personal information (also known as special categories of data) of which may include:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation
- Health information

We use this data to ensure services are delivered appropriately and to monitor equality, diversity and inclusion.

We will apply additional security and confidentiality measures when processing your sensitive personal information.

We will ask for your specific informed consent at the time of collecting this type of data.

Where you provide consent for us to process sensitive personal information, you have the right to withdraw this consent at any time.

We may also process confidential data about you including bank account information and property success codes.

How will we protect information about you?

We will apply appropriate technical and organisational measures to ensure your personal information is secure. For example, we have systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.

When we need to share personal data with our contractors and third party suppliers, our relationships are governed by our contracts with them which include strict data sharing and confidentiality protocols.

To help us ensure confidentiality of your personal information we will ask you (and any of your representatives) security questions to confirm your identity when you call us and as may be necessary when we call you. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you (as a one-off circumstance).

Who we will share your information with?

Sometimes we need to share personal information we hold about you with other organisations that we work with or who provide services on our behalf. When sharing information we will comply with all aspects of data protection law.

Where the information is of a sensitive nature, for example about your health, we will generally obtain consent from you prior to sharing this information, unless we are required or permitted to share this by law.

Where 'sharing' is in our 'legitimate business interests', we may share your information without seeking your consent first. This may be with:

Our contractors to facilitate repairs, maintenance or improvement works.

Debt and money management advisors.

Utility companies (and their representatives) and council tax departments to ensure billing details are correct.

Police and other relevant authorities (e.g. Department of work & pensions, probation service, HM revenue and customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty.

Other statutory organisations e.g. social services and health authorities as necessary for exercising statutory functions.

We may also share information when required by law for example where ordered by the court or to protect an individual from immediate harm.

Contact arrangements and promotion of our services

We will routinely use your contact details to send you information and communicate with you about your tenancy/lease/service. As a customer, we will also tell you about events in your area. If you have preferred method of contact, you can make this known to us, but we will use all means of contact available should we need to contact you in the event of an emergency or to enforce the terms of your tenancy/lease.

We would also like to keep you updated with information about other products and services (of ours and other reputable companies we work with) which do not form part of our core landlord services but which we think may be of interest to you and where this will assist us in meeting our objectives to transform lives and communities. This would include information such as accessing training and employment, financial

guidance, energy efficiency and digital support. It's a legitimate business interest for us to send you postal communications (from time to time) which may comprise information about all these areas of our work. You can object to receiving this type of content from us in the post. Before sending electronic communications of this nature, we will follow the law and guidance which requires us to seek your consent. You can change your mind at any time. Please just contact us or follow the 'unsubscribe' instructions that will be available on all of our promotional publications.

Community Campus 87 Ltd will never sell your personal data to third party organisations for marketing purposes.

How long will you keep my data?

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

We have a document retention schedule which sets out how long we keep different types of information for.

Your rights in relation to your data

Community Campus 87 Ltd is committed to upholding your rights in respect of your personal data.

The right to be informed

Through the provision of our suite of privacy notices, we will be open and transparent about how and why we use your personal information.

The right access

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 address and identify.

If you are seeking to obtain specific information (e.g. about a particular matter or from a particular time period), it helps if you clarify the details of what you would like to receive in your written request.

If someone is requesting information on your behalf they will need written confirmation from you to evidence your consent for us to release this and proof of ID (both yours and theirs).

We have 40 calendar days within which to provide you with the information you've asked for (although we will try to provide this to you as promptly as possible). In response to SARs, we will provide you with a copy of the information we hold that relates to you. This will not generally include information about your property such as repair logs, details of contractor visits, or general property maintenance information as this is unlikely to constitute your 'personal information'. Please be clear if you are seeking property or repairs related information as a SAR is unlikely to fulfil your information requirements.

The right to rectification

You can ask us to rectify your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by keeping us informed if your details change.

The right to erasure

The right to erasure is also known as ‘the right to be forgotten’. In some circumstances, you can ask us to delete or remove personal data where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the data. Our response will also be guided by the provisions of our retention schedule.

The right to restrict processing

In some circumstances you can ask us to restrict processing, for example:

- If you disagree with the accuracy of personal data
- If we were processing your data on the grounds of legitimate interests (as detailed earlier),
- And whilst we consider whether our legitimate grounds override those of yours

The right to data portability

If the situation arises where it would be helpful for you to move, copy or transfer personal data we hold about you, across different services. You may be able to ask us to do this.

Please contact us to discuss.

The right to object

You can tell us if you object to our processing of your personal data:

Based on legitimate interests

For the purpose of direct marketing (including profiling);

Rights in relation to automated decision making and profiling

You can ask us to review any decisions that are determined by automated means (some examples of where this may happen are noted earlier within this notice). You can also object to our use of your personal data for profiling.

If you'd like to talk to us about your rights, you can contact us at:

dpo@cc87.co.uk. Alternatively, if you want to raise a complaint about our processing of your data or would like to seek an independent view, you can contact the Information Commissioner using the contact details provided at the start of this notice.

Cookies

Cookies are small text files that are sent by websites that you visit to recognise who you are when you return here. The files are stored on your computer's hard drive, and are read by your web browser.

There are a number of options available so that you do not have to store any cookies at all. You can either set your browser so that it will not accept and store any cookie, or if you have a little more time and knowledge you are able to allow only certain 'trusted' sites to store cookies on your computer.

For further information visit: www.allaboutcookies.org.