

Stockport Homes Group

One team, transforming lives

**STOCKPORT HOMES GROUP
PRIVACY POLICY**

01 May 2022

Who we are

Stockport Homes is an Arm's Length Management Organisation (ALMO) with over 30,000 customers. It manages and develops housing on behalf of Stockport Council, owns a range of properties because of its in-house property development and acquisition activity and manages properties on behalf of other property owners.

Our role includes delivering a range of services to help manage and improve neighbourhoods, support vulnerable people, and helps the Council to discharge its legal obligations to those who need housing.

Our head office is based at Cornerstone, 2 Edward Street, Stockport, SK1 3NQ.

Stockport Homes works in a Group Structure. Stockport Homes Limited is registered as a Data Controller with the Information Commissioner's Office (ICO) [registration number [Z9540790]].

This Privacy Notice

This notice applies to the processing of data by Stockport Homes Limited. Other privacy notices include:

- Three Sixty Limited: <https://www.wearethreesixty.ltd/privacy-notice/>
- Viaduct Housing: <https://www.viaducthousing.com/privacy-policy/>
- Dash Architecture: <https://www.dasharchitecture.co.uk/privacy-notice/>

The Data Protection Officer

Our obligations under the Data Protection Regulations are managed by the Assurance Team who can be reached at assurance@stockporthomes.org.

The Stockport Homes Group has appointed a Data Protection Officer (DPO) to oversee compliance with the regulations. The DPO is the Head of Assurance. If you have any concerns or questions, our DPO can be contacted via assurance@stockporthomes.org or in writing to our head office.

Data Protection Officer
Cornerstone
2 Edward Street
Stockport
SK1 3NQ

What type of information do we hold?

We hold personal information about our customers to allow us to supply a range of services to them. We hold personal information about employees to enable us to meet contractual requirements and be a great place to work.

General personal data

We collect 'personal data' as defined by Article 6 GDPR. This can be considered general personal information, please see below for a non-exhaustive list of this type of information:

- Contact details (name, address, telephone number and email address)
- Personal identifiers (date of birth, national insurance number, passport details)
- Household data (details of who you live with)
- Customer interactions (records of contact between you and our staff)
- Customer feedback information (compliments and complaints)

- Financial information (rent arrears, bank, and card details)
- Information about criminal convictions you may have
- Information you have shared with us voluntarily

Special category data

We may collect sensitive information, this is known as special category data. This information is treated with added care due to its sensitivity; this includes:

- Information relating to racial or ethnic origin
- Data relating to religious or philosophical beliefs
- Disability or other medical information
- Information relating to your sex life or sexual orientation.

Why we need your personal information

We use information about our customers to plan and deliver a variety of services. We use your data in line with the principles set out in the Data Protection Legislation.

- To manage your tenancy
- To provide more support/assistance to you
- To keep neighbourhoods safe
- To manage your property
- To ensure we meet other legal obligations, for example health and safety
- To take part in data matching exercises, to find tenancy fraud and collect rent arrears
- To check performance and improve our services for customers
- To compile and analyse statistics, for example customer profiling

Why we use your information

Organisations must have a lawful reason to use your data. SHG will use one of the following conditions for most

- **The performance of a contract** – for example, if you have sent an application for a home, or we have an agreement with you, we will need to process certain information to fulfil our agreement. If we did not have that information, we would not be able to help you with the services you need.
- **The performance of a public task** - examples include the provision of housing to those in need.
- **Where required by law** - this includes sharing specific data to the police where there has been a crime
- **Vital interests** - on occasion, data may be shared so we can protect you from harm
- **Consent** – for example, if you have completed our online mutual exchange form to consent to your contact details being shared, so we can help you move to a new house.
- **Legitimate interests** – on occasion, the use of personal data will be reliant on a legitimate interest. Further information can be found below.

We also will use special category data; this may include the use of:

- **Disability** or other health information – this helps us assess any specific needs you may have so we can provide support
- **Religion, ethnic origin, and sexual orientation** – this is so we can monitor equality and diversity and the treatment of our customers.

Legitimate interests

Where SHG relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

How we share your information

We will share your information with employees within SHG who need it to provide you with the service you need.

There may be occasions where we share your data, this may happen when:

- A third-party supplies a service on our behalf, for example maintenance or repair works
- There is a legal requirement to do so – for example to prevent and detect crime, in line with the Data Protection Legislation
- We are working in partnership with another organisation – for example, a support agency, Stockport Metropolitan Borough Council (SMBC), or the [Safer Stockport Partnership \(SSP\)](#)
- We may share basic customer data with utility providers where we have a legitimate interest. In such cases, the personal data supplied will be limited to name and tenancy start date unless more information is justifiably needed.
- As part of the Rental Exchange project, we will share your tenancy information with Experian, including your rent history. This is to enable tenants that pay their rent to build up a good credit score. For more information please see [The Rental Exchange page](#).

In some instances, data may be transferred outside of the European Union. In all cases, we will take adequate steps to ensure the security and protection of your personal information.

Stockport Homes protects its staff from violence, threatening behaviour and verbal abuse. Our staff can now use devices to monitor and record incidents where they feel their personal safety is at risk. Audio recordings obtained through these devices may be used to take sanctions against offenders and may be used in criminal and civil proceedings.

On occasion, we may have a duty to share your information with:

- Stockport Metropolitan Borough Council and other housing associations
- Utility providers if you have moved home without paying a final bill
- Emergency services and healthcare professionals
- The police and other law-enforcement services for the prevention & detection of crime, or where we are required by Court Order
- Our regulators such as the Housing Ombudsman or the Information Commissioners Office

Recording calls

Calls to our contact centre are recorded for training and monitoring purposes and kept for 3 months from the date of the call. There may be occasions where calls are held for a longer period while training is ongoing.

CCTV

Stockport Homes uses CCTV systems in residential areas and on its property to record images for the purposes of public safety and asset protection. Images may be shared with other agencies for these and related purposes or as required by law.

Please note that CCTV footage captured on Stockport Homes' cameras is deleted after 23 days.

More information about our use of CCTV footage can be found in us [CCTV Code of Practice](#).

How we keep your information safe

Data security is particularly important to us. We will ensure that your data is always kept safe and secure

- We handle your information responsibly and respect your confidentiality
- We only collect and process data where it is necessary for us to do so
- We securely delete / destroy data when it is no longer required
- Are open with you about how we use your data and who we may share it with respect to your privacy rights

Training is delivered to staff with access to customers' personal information. This training is delivered and facilitated by The Head of Assurance and The Assurance Team.

Data is stored on our Housing Management System called Civica CX. This system integrates with O365 and SharePoint to allow us to meet the needs of a modern housing company.

How long we keep your information

We keep your data on file for as long as it is needed for the purpose it was collected, this is based on the following criteria:

- How long you have been a customer and when your tenancy ends
- If we need it to make or defend against legal claims
- Any time periods set by our regulators or professional bodies
- If there is a legal requirement

Your rights

Under the UK Data Protection Legislation), you have rights relating to how we process your personal data. These rights include:

Right to be informed

You have the right to ask us to explain why your information is collected, how it is used, how long it will be stored for, and who it is shared with.

Right to access

You have a right to access your personal data, this is called a Subject Access Request (SAR).

If you would like to submit request, please visit the [SAR page on the website](#). Alternatively, you may complete and return our Subject Access Request Form which is available on request. You may also make your request verbally or in writing.

There may be some occasions when we are unable to provide you with some information for

example, if it was provided in confidence or if it relates to a criminal proceeding. For more information, please refer to our [Information Governance Policy](#) or review information provided on www.ico.org.uk

Right to rectification

We work to ensure that all personal data held about you is accurate and up to date. However, there may be times when the information we hold is no longer correct. If this is the case, please contact us and we will update it for you.

Right to erasure

In some circumstances, you have the right to request the deletion of your personal data. This is not a guaranteed right as we may have a legitimate or legal reason to keep the information. For example, an existing customer could not be forgotten as there is a distinct legal basis for Stockport Homes to be processing that data (the information is necessary for the performance of a contract). We would not be able to provide services to customers without using the personal data.

Where information is needed to fulfil statutory obligations, personal information shall be retained for those purposes, and so this right may not be applicable in those situations.

Right to restriction

Where information cannot be erased you have the right to restrict the processing of your personal data. This limits how we use your personal information.

Where processing is based on your consent, you have the right to withdraw that consent. This can be actioned by you at any time.

Right to data portability

In certain circumstances you have the right to have your personal data transferred from one organisation, to another. This right only applies to information you have provided to us and it does not apply to paper records.

Right to object

You have the right to object to the processing of your personal data. Should you object to any processing please contact us with the details of your objection and we will take your concerns into account. This does not necessarily mean your data will be erased, instead we may restrict the processing.

You have the right to object to direct marketing communications. This can be actioned at any time and we will update our records accordingly.

You also have the right to object to any processing conducted wholly or partly by automated means. If you object to the decision you can request it be reviewed manually by a member of the organisation.

Rights related to automated decision making and profiling

You have the right to not be subject to a decision that is made solely by automated means, including profiling, so long as the decision produces a legal effect.

Should you wish to object/not be subject to any automated decision please let us know any

we will update our records.

For more information regarding your individual rights please see our [Data Subject Rights Policy](#).

What to do if you have a concern about how we have handled your data

If you are not satisfied with how we have handled your personal data, you can raise a complaint. More information on our complaints process is available [here](#).

If you are not satisfied with our response to your complaint, you also have the right to lodge a complaint with the supervisory authority, The Information Commissioners Office (ICO).

To make a complaint, visit <https://ico.org.uk/make-a-complaint/>