Privacy Notice

Newlon Housing Trust

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1 Purpose of this Privacy Notice

Under data protection legislation, Newlon is required to explain to you why we collect information about you, how we intend to use that information and whether we will share your information with anyone else.

This Privacy Notice is a public document available to anyone and applies to customers of Newlon Housing Trust to explain how the organisation collects and processes personal information in order to conduct normal business activities as a UK charitable housing association.

2. Who we are

We are Newlon Housing Trust, a Community Benefit Society registered in England and Wales under company number IP18449R and with our registered office at 4 Daneland Walk, Hale Village, London, N17 9FE. We are the parent company of the Newlon Group. We are a Registered Social Landlord (RSL) regulated by the Regulator of Social Housing (RSH). Normal activities can be summarised as:

- Providing social and other types of housing.
- Property and grounds maintenance and repair.
- Managing your housing, tenancy/lease and account as your landlord.
- Newlon is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

3. Source of your personal information

Newlon Housing Trust collects information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We may collect information when you use our websites or self-service portal 'MyNewlon' including if you are a job applicant or visitor to the website.

Our landline phone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of six months.

We operate a CCTV system at our offices and some of our housing schemes for the detection and prevention of crime. It operates continuously and recordings are held for one month.

From time to time we may operate CCTV, sound recording or use photography to capture evidence of breach of tenancy, alleged Anti-Social Behaviour or crime.

We may also take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent.

We may receive information about you from third parties including:

- Your council or benefits office or your employer relating to your housing.
- Prior landlords and credit agencies when you apply for housing.
- Police, welfare or support organisations dealing with you.
- Councilors, MPs or other representatives acting on your behalf/instruction.
- Financial institutions when you apply for our services.

4. Types of personal information we use

The information we require from you, the tenant(s) or leaseholder(s), includes:

- Full name (and proof of your identity/photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details anyone authorised to act on your behalf if applicable and your next of kin.
- Basic details (name and DOB) of all household residents.
- Banking details if you pay your rent by Direct Debit.
- Card details if you pay by card (however card details are not stored).
- Proof of housing eligibility, any interest or equity in other property.
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged Anti-Social behaviour or fraud.

The information we may collect from you includes:

- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances and needs, and for safeguarding of staff and contractors.
- Financial information. We may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills. We may use this to apply for funding on your behalf.
- Health information when we require this to support funding for adaptations made to the property you are living in or for the purposes of assessing your eligibility for certain enhanced services or suitability for a current or prospective property. More specific details are provided if you use this service. •Photo ID, bank statements, payslips or income details when we require this information for processing a house sale, purchase or establishing your Right to Rent in accordance with Home Office guidelines.
- Details about the contact that you have had with us and the services that we have provided to you.
- Anonymous data related to the Google accounts of users of our website and residents' portal to help analyse the effectiveness of our online services.

5. What we do with your information

The information we require from you is used to manage your tenancy or leasehold agreement or other contract between you and Newlon Housing Trust.

The processing activities we conduct can be summarised as:

- Managing your account charges and payments, including arrears.
- Managing the repairs, maintenance and adaptations of our properties.

- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.
- Providing you with information that may help you to sustain your tenancy – such as changes to policy, information about employment opportunities and debt advice.
- Processing a job application if you are a job applicant.
- Analysing usage of our websites.
- Complying with relevant legislation and regulation.Newlon Housing Trust conducts research and statistical analysis to help improve our business processes and the services offered to our customers. As part of this we may analyse data about services and conduct surveys relating to our services in order to gauge the effectiveness of what we do and make improvements based on feedback.

Newlon Housing Trust operates a range of information and communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

6. How we use your sensitive information

Some of the information which we collect will be special categories of personal data (also called sensitive personal data), such as information about your ethnic background or your health. We will use your particularly sensitive personal information in the following ways:

- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and to make suitable adjustments to the service we provide.
- Under exceptional circumstances, we may share information with relevant authorities in order to comply with our legal obligations or protect your vital interests – for example with the emergency services in the event of an emergency or serious incident.

7. Children's information

Newlon Housing Trust does not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, 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.

8. Property information

Much of the data we use relates to our properties and their maintenance and repair. We do not consider property information used in conjunction with the property address to be your personal information. For example, the age of the kitchen, results from an asbestos survey, planning to replace windows or a repair to a tap.

We are usually happy to provide you with answers to questions you may have about the property you are living in and work done to it.

As soon as your name, contact details or other personal information is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information.

9. How we will communicate with you

Newlon Housing Trust needs to communicate with our customers and this will usually be in writing or by telephone, but is more commonly becoming electronic and paperless. We are moving many of our services on-line as this is usually more convenient for you and more efficient for us. Our secure on-line tenant service will be launched in 2018.

If you use the Newlon's Customer Portal it is important that you keep your password secure and do not share your 'MyNewlon' login details with any other person. The privacy of your information, as with any on-line service, depends on you keeping your account username and password details to yourself, as well as setting a suitably complex password that cannot be guessed or calculated.

We will only discuss or communicate your tenancy or lease details with those named on the agreement. Before we discuss your tenancy matters we will carry out some security checks to ensure that we are speaking to the tenant or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently in writing.

10. Who we share data with and how long we keep information

Newlon Housing Trust shares limited personal data with our contractors who are carrying out services on our behalf. Our contractors are required to comply with the law and our own Data Processing Agreement to ensure data is managed appropriately and for specified purposes, including to run our out-of-hours telephone service or to complete emergency, responsive or planned property repairs.

We may share your information with a language translation service if it is necessary to translate any information into or from a foreign language for you.

Newlon Housing Trust may need to share personal information with government departments and agencies, with our regulator and auditors, with utility companies or with other organisations and agencies where we are legally allowed to do so. One example of this is with a government agency who monitors all social housing lettings and sales for research and statistical purposes, Newlon share your personal information with them in order for CORE to perform this function. This is treated in accordance with Data Protection requirements.

In addition Newlon may share information with third parties, including the police in the prevention and detection of crime and fraud.

Information relating to a tenancy or lease agreement will be kept for as long as the agreement is active or where money is owed on the account. Generally, tenancy and lease files will be kept for up to 6 years following the end of the tenancy. The basic history of who held a tenancy at which property and when will be held forever.

We may need to share information with solicitors, agents, mortgage brokers, financial advisors, court agents, surveyors, credit reference agencies and valuers relating to a property sale.

11. What may happen if you do not provide your personal information

If you do not provide the information we need then we may not be able to provide all our services to you, and ultimately you may not be able to hold a tenancy or lease with us, or sell or purchase a property through us.

12. What we will not do with your data

- We will not send you unsolicited marketing material for commercial purposes.
- We will not sell your personal data on to third parties.
- We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.
- Where we work with companies based outside of the UK, for example, software providers that are based overseas, we will ensure that it is protected by laws or standards that are aligned with UK Data Protection legislation such as European General Data Protection Regulation (GDPR) or UK-US data bridge standards.

13 Use of artifical intelligence (AI)

We may use artificial intelligence (AI) tools to support the delivery of our services and improve efficiency in areas such as administration, drafting documents, analysing information and responding to queries.

Where AI is used, appropriate safeguards are in place to protect personal data and ensure compliance with data protection legislation. AI-generated outputs are reviewed by a member of staff before being relied upon or used in decision making. We remain responsible for the accuracy, quality, and lawful processing of personal information and do not use AI as the sole basis for decisions that have a legal or similarly significant effect on individuals.

We do not use AI to make decisions about residents, customers, employees or other individuals without appropriate human involvement and oversight.

14. Your rights, the right to complain and the Information Commissioner's Office (ICO)

Under data protection law you have the right to request copies of your personal information from us. Please contact **dataprotection@newlon.org.uk** if you wish to request access.

You are not required to pay any charge for exercising your rights and if you make a request, we will respond within one month. It will always help if you can be specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search.

You have the right to ask us to restrict the processing of your personal information or object to the processing of it in certain circumstances. You may also ask that we transfer the personal information you have given us to another organisation in certain circumstances. You also have the right, in certain circumstances, to ask us to erase your personal information.

You may ask us to rectify personal information you think is inaccurate and to also complete information you think is incomplete. Please contact our Customer Services team on **020 7613 8080** or email customerservices@newlon.org.uk to do so.

If you have any concerns about our use of your personal information, you can make a complaint to us by contacting **dataprotection@newlon.org.uk**.

You can also complain to the ICO if you are unhappy with how we have used your data using any of the following:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Helpline number: **0303 123 1113**

ICO website: **https://www.ico.org.uk**

15. Right to withdraw consent

You may withdraw your consent to use any information that was previously provided with your consent. Please advise us if you wish to withdraw any consent previously given to **dataprotection@newlon.org.uk**.

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at **https://ico.org.uk/**.

You have the right to complain about any matter relating to our service, including how we use your personal data:

- In the first instance please contact our Customer Services team on **020 7613 8080** or email **customerservices@newlon.org.uk**.
- If you are still not happy with our service you may complain to the Housing Ombudsman Service at **http://www.housing-ombudsman.org.uk/**.
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at **https://ico.org.uk/**. Our ICO registration number is **Z6084917**.

16. Further information

Newlon Housing Trust produces a number of different leaflets designed to inform you about our services and other useful topics. Please see our website for further information on data protection: **www.newlon.org.uk**.

Our Data Protection Officer is Glenn Dhurowa, who can be contacted by emailing **dataprotection@newlon.org.uk**.

17. Changes to our Privacy Notice

Our Privacy Notice is regularly reviewed and kept up to date. This version was updated on 2nd February 2024. The latest full version is always available from our website: **www.newlon.org.uk**.