



## Privacy Notice

### How we use your personal information

Squared is a trading name of Luton Community Housing Limited a Registered Social Landlord and is registered with the Information Commissioner's Office as a data Controller under the General Data Protection Regulations 2018.

This privacy policy explains what personal information we hold about you and how we use any personal information we collect about you when you use any of our services or when you visit our website.

### What information do we collect about you?

Squared collects, processes and stores personal information about **customers** including current, former and potential customers, who live in our properties or access our support and other services, and could also include their family and people associated with them. We hold personal data such as your:

Names, Date of Birth, contact details and records of any transactions such as payments or requests for information as well as sensitive personal data such as gender; ethnicity; religion or other beliefs, sexual orientation and medical history. We will collect, process, share and securely store personal information in compliance with the General Data Protection Regulation 2018.

All information will be retained in accordance with the requirements of our retention policy.

### How we collect personal information and how do we use this?

We collect information in a variety of ways which include tenancy/license agreements, HB applications, contracts, ongoing contact with you, also via CCTV systems we monitor and collect visual images for security reasons, prevention and detection of crime and staff safety and monitoring purposes.

### How will we use the information about you?

We use your personal information to enable us to offer you accommodation and support, occupancy of property and to communicate with you in order to provide services which meet your needs. Please see table below of breakdown of how we will use some of your information.

Information we collect about you	How it is used
Name, Date of Birth (DOB), Marital status, contact details, housing history	<p>Offer suitable accommodation, property and effectively communicate through preferred method (email, phone, text, post), engage, provide information requested.</p> <p>Previous housing circumstances to assess housing applications and help prevent tenancy fraud and illegal subletting.</p>
Proof of identity – Passport, driving license, National Insurance Number	To record your right to rent in the UK, you are able to qualify for Housing Benefit and you can receive our support services.
Financial records – bank details, methods of payments of rent, Universal credit/Housing Benefit claims, rent payments, arrears records, notices of seeking possession	To set up a rent account, ensure payments are received, monitor arrears, and help if you get into arrears.
<p>*Support Information (<i>if in support services</i>)– * physical/mental health issues, * health issues, * safeguarding information, additional support services, training and employment (job history), education. Household income &amp; expenditure * Medical history</p>	<p>To improve your financial circumstances, live a healthy lifestyle, provide specific support, refer to relevant agencies, help apply for benefits you are entitled to.</p> <p>We may also hold information provided by third parties where this is relevant to your housing and support circumstances e.g. from social workers and health professionals (e.g. doctors, mental health worker and occupational therapists).</p> <p>Disclose medical history to A&amp;E, emergency services, medical services if you are not capable to give consent. This could be vital at Betty McKean Hostels where we may have to disclose your information to protect the vital interest of your child.</p>

Questionnaires, Surveys, feedback	To make sure that we are providing a good service, monitor our performance, carry out research to make improvements to our services provided to our customers.
Tenancy history, recording repair requests, gas servicing etc.	Keep record of every repair and maintenance done in a property.
Communication history, telephone call, emails, texts CCTV and other footage, voice and video recordings Noise recordings	We keep records if they are relevant for training and monitoring purposes, so we can ensure we are delivering a good service.  For safety and crime reduction/prevention.
Reports of complaints, incidents, challenging behavior and warning markers	To keep customers, colleagues and contractors safe, ensure complaints are dealt with and risks minimized.
Photographs taken, quotes, feedback and other reasons	To use in our newsletters, promotional literature, media to promote Squared (permission is always asked).In supported housing we may use them to manage risk.
*Ethnicity, * sexuality, * religion	Monitor equal opportunities, to help customers for example if you need support or have been harassed because of any of these things.  Ensure we meet all our legal and statutory duties such as those which apply under the Equality Act 2010.

*Some of the above information marked with \* is classed as Sensitive under the Data Protection Act. Sensitive data is information relating to physical or mental health, sex life, religious or philosophical beliefs, political opinions, membership of a Trade union, allegations of criminal offences and criminal convictions and offences.*

We would like to provide you 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. This would include information such as accessing

training and employment, financial guidance and digital support. You can let us know at any time how you prefer to be contacted or if you do not want us to contact you with this information. We never provide your personal information to other companies for their marketing purposes.

### **Your new rights from 25<sup>th</sup> May 2018**

If you're UK/EU citizen, the new regulation means your rights will be stronger in the following ways:

- You will have to give your consent to the way your personal data is being processed. Squared will obtain your consent before your data is given to any external agencies except in situations and circumstances where the data will have to be given to comply with other legal basis of processing your data.
- You'll have the right to know why Squared is using your data, how long we'll keep it and who can see it.
- You'll have the right to access any data Squared holds on you. You can ask for a "subject access request", which means we must give you all data we hold about you.
- You have the right to be forgotten. This means you can ask Squared to delete your data if it is no longer necessary for the purpose we collected it for, or if you no longer consent for us to use the data.
- You have the right to portability. This means you can request for your personal data to be reused for your own purposes across different services by copy or transfer from one IT environment to another in a safe and secure way.

Generally, the information we hold will have been provided by you (on application/assessments or enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing and support circumstances e.g. from social workers and health professionals (e.g. doctors, mental health worker and occupational therapists).

We will only ask for personal information that is appropriate to enable us to deliver our services. In some cases, you can refuse to provide your details if you deem a request to be inappropriate. However, you should note that this may impact our ability to provide some services to you if you refuse to provide information that stops us from doing so.

### **Visitors**

We may have to check the i.d. and do police checks of unknown and unexpected visitors due to health & safety and Safeguarding concerns. We have legitimate interest to ensure every

resident in our hostels is safeguarded and protected from harm. This include the partners who are applying to stay overnight at mother and baby hostel.

### **Children's information**

We do hold data for children at the mother and baby hostels. These are basic personal data such as name, age, DOB, next of kin for the child and parents' details. We do not share any information about children without consent unless the law and policies allow us to do so under exceptional circumstances e.g. if there's child protection or safeguarding concerns arises.

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

Processing of your personal information will be undertaken in accordance with the principles of the General Data Protection Regulation 2018. Access to personal information is restricted to authorised individuals on a strictly need to know basis. We will treat your personal information fairly and lawfully and we will ensure that information is:

- Processed for limited purposes;
- Kept up-to-date, accurate, relevant and not excessive;
- Not kept longer than is necessary;
- Kept secure.

We are committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to ensure your details are accurate. To help us to ensure confidentiality of your personal information we will ask you security questions to confirm your identity when you call us and as may be necessary when we call you.

We may class your information under "Red, Amber or Green" (for example, in relation to your vulnerability, support needs or risks) to enable us to tailor and deliver services to you. Squared only holds 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.

### **Sharing your personal information**

Your personal information will be kept secure and confidential. However, there may be times when we will share relevant information with third parties or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the General Data Protection Regulation legal basis.

Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures. Some of this

information is stored on our In-form web-based system which is password protected to enable to support you effectively. This information will only be accessed by the authorised staff members and all support providers who have signed the Information Sharing Agreement with Luton Borough Council if required.

Where necessary or required, we may share your personal information as follows:

- With our contractors, in order to undertake repairs, maintenance or improvement works, our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols;
- With community partners in connection with the delivery of coordinated local services;
- With utility companies (and their representatives) and Council Tax Offices, to ensure billing details are correct;
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges;
- With local authorities and government departments, as necessary for administering justice, or for exercising statutory, governmental, or other public functions;
- With police and other relevant authorities (e.g. Probation Service, Department of Work & Pensions, HM Revenues & Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty;
- With other statutory organisations, e.g. social services & health authorities, as necessary for exercising statutory functions;
- With our regulator, the Homes England and Regulator of Social Housing to comply with our obligations.
- Auditing and inspections to meet our contractual and legal obligations.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations;
- In connection with legal proceedings (or where we are instructed to do so by Court order);
- To protect the vital interests of an individual (in a life or death situation).

### **Access to Your Personal Information**

Please contact us using your preferred contact method if you would like copies of some specific information from your files, and we will try to provide it as quickly as possible. If you

require a substantial amount of your personal information, there is a formal process for this, 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 identity.

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).

The access to your personal information is provided free of charge in most circumstances. However, we may charge a processing fee if the request is “manifestly unfounded or excessive”.

We have one calendar month 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 some cases, if we are unable to provide the information within a month, then we will notify of the reasons for the delays. This then will allow the deadline by another two months if the request is complex or multiple requests have been put in.

In response to SARs, we will provide you with a copy of the information we hold that relates to you. If you need us to correct any mistakes contained in the information we hold about you, you can do so by contacting the Squared Data Protection Officer.

### **Information we collect via our website**

The system will record information such as IP address for the purpose of legitimate interest to ensure service provision and security. Information volunteered to us by you, for example via online forms – name and email address will be treated as confidential and will not be passed on to any other site. If you follow a link to an external site, we recommend that you check the privacy notice of the site before giving any personal details.

Please see our Website Privacy Policy for further information.

### **Sending & Receiving Emails**

Please be aware that emails we send or receive may not be protected in transit due to the nature of email transitions generally.

### **Changes to this privacy notice**

We keep our privacy notice under regular review and place any updates on our website. Whilst we recommend that you keep up to date via the website, any major changes will be brought to your attention.

This privacy notice was last updated in Aug 2019

### **Further Information**

For further information on how to request your personal information and how and why we process your information, you can contact us using the details below:

Data Protection Officer:

Rob Robinson ([rob.robinson@squared.org.uk](mailto:rob.robinson@squared.org.uk))

Contact Number: 07548 216 875

The Information Commissioner Office (ICO) is also a source of further information about your Data Protection rights. The ICO is an independent official body, and one of their primary functions is to administer the provisions of the General Data Protection Act 2018.

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

Tel: 0303 123 1113 / <http://www.ico.org.uk/>