



Privacy Notice

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Author: James Osborne

for you – for your community – not for profit

Two Rivers Housing – Privacy Notice (Full)

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1. Summary

This Privacy Notice is a public document and applies to all customers of Two Rivers Housing and subsidiaries to explain how the organisation collects and processes personal information to conduct normal business activities as a UK charitable housing association. We are a Registered Social Landlord (RSL) regulated by the Regulator of Social Housing (RSH). Normal activities can be summarised as:

1. Providing social and other types of housing.
2. Property and grounds maintenance and repair.
3. Managing your housing, tenancy/lease and account as your landlord.

We also provide additional services including:

4. Promoting, organising and assisting community events.
5. Offering opportunities to be involved (co-regulation).
6. Providing welfare, benefits and debt advice (WBDA).
7. Adaptations made to the properties we manage.
8. Marketing, buying, selling and letting of properties and/or land.

Together we can make a real difference to the lives of thousands of families across our communities to ensure that everyone has a warm, safe, affordable home.

2. Who we are

Two Rivers Housing is the Data Controller whose head office is located at Rivers Meet, Cleeve Mill Lane, Newent, Gloucestershire, GL18 1DS. Tel: 0800 316 0897. The company Data Protection Officer can be contacted at DPO@2rh.org.uk.

We own over 4,000 properties in Gloucestershire, Herefordshire and Worcestershire and employ around 170 staff, mostly based at our head office.

We have wholly-owned subsidiary social enterprise companies who conduct work for us as well as independent work, including Centigen Facilities Management, www.centigenfm.co.uk, and TwoCan Estate Agency, www.twocan.estate. We may also operate as a Data Processor for our commercial customers.

3. How we collect your information

Two Rivers Housing 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 social media sites, websites or 'My account'.

Our landline phone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of six months. Notes may be made in our CRM system about conversations that take place.

We operate a CCTV system at Rivers Meet office premises for the detection and prevention of crime. It operates continuously and recordings are held for one month.

From time to time and in some shared areas (eg a communal bin store, shared entrances/areas, development sites) we may operate CCTV / sound recording and / or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. We follow the ICO's CCTV Code of Practice, and we put up notices so you know when CCTV is used. Covert CCTV is not used.

We take photographs at our properties, events and in our communities to use for record keeping, marketing and publicity. Photographs of individuals will only be used for marketing and publicity with the individuals consent.

We may receive information about you from third parties including:

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

4. What information we collect about you

The basic information required from all customers is your name and contact details, such as email, telephone or address.

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

- Full name (and proof of your identity / photo ID).
- Date of birth (DOB).
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf, if applicable.
- 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 about you includes:

- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances.
- Financial information. We may use this for pre-tenancy affordability and sustainability checks, 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 or apply for funding on your behalf.
- Health information and other information relating to your circumstances when we require this to support grant application or funding for improvements or adaptations made to the property you are living in. More specific details are provided if you use these services.
- Next of Kin or Emergency Contact Information you provide to be used in case of emergency. You should only provide this information where you know the contact is happy to act as your emergency contact and could expect Two Rivers Housing to contact them about you.
- Other special category information for statistical reporting and analysis purposes including complying with regulation and equality legislation.
- Photo ID, bank statements, payslips or income details when we require this information for processing a house or land sale, purchase or let.
- Shared utility systems data or smart home data that is used to monitor your home where those systems are installed.

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, purchase or let a property through us.

5. What processing we do with information collected

The information we require from you is used to manage your tenancy or leasehold agreement or other contract between you and Two Rivers Housing. Please read your contract carefully for specific details as 'performance of a contract' is usually the legal basis for processing your information and carrying out our activities.

The processing activities we conduct can be summarised as:

- Managing your account charges and payments, arrears, debt and recharges.
- Managing the repairs, maintenance and adaptations of our properties.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with rent arrears, debt, anti-social behaviour (ASB) or fraud.
- Marketing, buying, selling, and letting of properties and/or land.
- Complying with relevant legislation and regulation.

Warning and vulnerability information may be processed as part of any function we legitimately perform for safeguarding of our workforce, including contractors.

Two Rivers Housing conducts research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

Two Rivers Housing conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Two Rivers Housing 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.

Two Rivers Housing holds information in its IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data on Two Rivers Housing owned systems is held within the UK.

Two Rivers Housing also uses a number of third party and hosted systems and solutions such as Microsoft 365 which may operate servers and store data in Europe, the European Economic Area (EEA) or outside of the EEA. Two Rivers Housing only works with organisations which state that they comply with UK data protection legislation, EU GDPR or equivalent privacy standards.

6. Additional voluntary services

Two Rivers Housing conducts a number of additional voluntary services including organising community events, providing debt advice, adapting the property you live in

and gathering information to improve our services.

For these voluntary services, where your personal information is needed and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

For the additional services, much of the information contained in our Privacy Notice is still relevant, such as details about Two Rivers Housing as the Data Controller, contact information for the Data Protection Officer and the rights you have under the legislation, including the right to withdraw your consent and the right to complain.

7. Children's information

Two Rivers Housing 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 an ASB case, welfare case or 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

Two Rivers Housing 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 is called 'My account'.

If you use the 'My account' service, it is important that you keep your password secure and do not share your 'My account' 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. In the case of a joint tenancy both parties have their own 'My account'.

Our tenants will receive our newsletter 'Tenant Topics' with information about what is going on within the organisation and in our communities. We are required by our regulator to keep our tenants informed and to offer opportunities for involvement, but you may opt-out by updating your 'My account' preferences or contacting customerservices@2rh.org.uk.

Our tenants may receive promotional material about community events that relate to them or which are taking part in their local community, but you may opt-out by updating your 'My account' preferences or contacting customerservices@2rh.org.uk.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily verbally over the phone or permanently by contacting incomecollection@2rh.org.uk and completing our authorisation form in writing.

10. Communicating with other customers

Where Two Rivers Housing needs to communicate with other customers who are not tenants or residents then it is most likely you are a supplier, partner, purchaser or seller, freeholder or leaseholder, stakeholder or member of the public.

Two Rivers Housing usually works with suppliers, partners, purchasers/sellers and freeholders/leaseholders as part of a formal agreement or contract, or while entering into a contract.

Two Rivers Housing may need to communicate with stakeholders or members of the public where we believe there is a legitimate interest to communicate as part of normal business, such as to answer your queries, ask you a question or keep you updated on a matter involving or relating to you or your function.

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

Two Rivers Housing shares limited personal information 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 agreements 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 and improvements.

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.

Two Rivers Housing may need to share personal information with government departments and agencies, with our regulator and auditors, with utility companies or other organisations and agencies where we are legally allowed or required to do so.

The following are available from the Policies section of our [website library](#).

- CORE Privacy Notice New Tenants.pdf
- CORE Privacy Notice Existing Tenants.pdf

Information relating to a tenancy or lease agreement will be kept for as long as the agreement is active, where a contractual matter / obligation remains unresolved or where money is owed on the account, and for a period not exceeding six years afterwards in line with our Data Retention Policy.

We may need to share information with property or land owners or freeholders, solicitors, agents, mortgage brokers, financial advisors, court agents, surveyors and valuers relating to a property or land sale.

12. What we will not do

We will not send individuals unsolicited direct marketing material without their consent, however we may conduct business to business marketing campaigns.

We will not sell individuals personal information on to third parties.

We will not pass on your personal information to unrelated third parties unless we are allowed or required to do so by law, or we have your explicit permission to do that.

13. Your rights, the right to complain and the ICO

You have the right to request a copy of the information we hold about you. Please contact customerservices@2rh.org.uk if you wish to request access to any of your personal information and we will always endeavour to answer your questions as part of our normal friendly, helpful service.

If you request a Subject Access Request, or SAR, we will not normally make a charge for this service and will respond within one month of receiving your request. However, it will always help if you can be specific about what personal information you want to see, what it relates to and within what timeframe, as that will assist our search.

You have the right to correct information that we hold. Please advise us of any changes or corrections by contacting our Customer Services team on 0800 316 0897 or via e-mail to customerservices@2rh.org.uk.

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 customerservices@2rh.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 information:

- In the first instance please contact our Customer Services team on 0800 316 0897 or e-mail customerservices@2rh.org.uk to raise a complaint.
- 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 information you may complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/>. Our ICO registration numbers are Z9137407 and ZA111388.

14. Further information

Two Rivers Housing produces a number of different leaflets designed to inform you about our services and other useful topics. There is a leaflet on 'Compliments and Complaints' available from the Leaflets section of our [website library](#).

For further information about Two Rivers Housing, please see our website at www.tworivershousing.org.uk (including [website terms & conditions](#) and information about [website cookies](#)) or contact our Customer Services team.

15. Changes to our Privacy Notice

Our Privacy Notice may be updated from time to time. The latest full version is always available from our website at www.tworivershousing.org.uk

16. Future enhancements

We regularly improve our 'My account' on-line service and include a Privacy Dashboard where you can set or remove consent for various optional services and opt out of receiving communications.