

## How we use our customer's information

### (Fair Processing Notice)

#### 1. Introduction

This Fair Processing Notice applies to anyone accessing Stoll's housing or support services. It explains how the organisation collects and processes personal information in order to conduct normal business activities.

During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) and treat it in an appropriate and lawful manner.

This notice tells you

- what information we are processing and why
- in particular, what we might share, who with, and why
- the lawful basis for processing
- how long we will retain your information
- how we will keep it safe, and
- what your rights are

The lawful basis for processing will be one or more of the following:

- it is necessary for assessing your tenancy application, or operating your tenancy agreement or our contract with you, or
- it is necessary for compliance with a legal obligation, or
- it is in the legitimate interests of us or someone else

We will only rely on our legitimate interests if we are confident that they are not outweighed by your rights and interests.

However, if the information is about your health or social care, or something else you can expect to be kept private, we will always seek your explicit consent unless there are exceptional circumstances. They are when processing, in particular sharing, is

- a proportionate response to a pressing public interest need (see below), or
- the law requires or permits it (and it is appropriate to apply the permission), or
- a court has ordered it.

When we seek your consent we will tell you precisely what the information is, what we want to do with it, and why. In particular, we will tell you who we might want to share it with and why.

We must ensure your consent is freely given – not the result of undue pressure from us or anyone else – and that you understand your consent can be withdrawn at any time.

## **2. How we collect your information**

Stoll collects information from you via a variety of sources, including when you apply for one of our properties or support 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 self-service portal 'My Tenancy'.

We operate CCTV system at our premises for the detection and prevention of crime. It operates continuously and recordings will only be kept for a month unless there is a need to download evidence for police or legal proceedings.

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 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
- Your GP for medical history
- MoD for your service history

## **3. What information we collect about you**

The information we require from you in order to access our services 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 of anyone authorised to act on your behalf if applicable.
- Basic details (name and DOB) of all household residents.
- Basic contact details of next of kin and/or family members, where relevant.
- Banking details
- Card details if you pay by card (however card details are not stored).
- Proof of housing eligibility, any interest or equity in other property.
- Personal characteristics such as gender and ethnic group
- Military Service number and service history
- Disabilities or vulnerabilities.
- Financial information
- Health information

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;

- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services;
- to enable us to deal with emergencies or liaise with support organisations.

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.

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

#### **4. What processing we do with information collected**

The information we require from you is used to manage your tenancy and to provide support services.

The lawful basis for processing this information is necessary for the operation of the tenancy and in the legitimate interest of the business to provide support services to you.

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.
- Implementing and reviewing your support plan
- Ensuring tenancy conditions are complied with, such as dealing with anti-social behaviour or fraud.
- Complying with relevant legislation and regulation.

Stoll 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 does not identify individuals.

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

#### **5. Support and Outreach Services**

Stoll provides a range of support services for all customers, promoting independence. This includes an Outreach Service, Independent Living Service, Health and Wellbeing activities, Employment and Training support, IT and numeracy tuition and support with drug and alcohol abuse. The lawful basis for processing this information is in the legitimate interest of the business to provide support services to you.

We need your information:

- to agree what support you need, how often you may need it and when
- to create a person centered support plan
- to inform other staff about your needs and situation so that you don't have to repeat questions
- to share with health and social care providers to ensure support is tailored to meet individual needs
- to get accurate information through surveys and figures about the number of people using our services and their different needs, to help us provide the right services, apply for funding and plan better for the future.

For additional services, where your personal information is needed, we will always notify you about the service being offered, explain the service and obtain your consent to proceed, usually by way of a consent form.

Your personal information may be shared with emergency services, the lawful basis of which is in your vital interest or in the vital interest of others.

## **6. Who can access your information?**

The data is accessed by staff working in Stoll's Housing, Support and Finance teams; staff in each area can only access the data that is essential to their work.

In addition, other teams may request information if appropriate for example; to deal with complaints or emergencies.

## **7. Children's information**

Stoll does not normally process children's information, as all customers 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. If 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. All contractors are bound by strict requirements as to confidentiality and security, including deleting or returning the information once the work is completed.

## **9. How we will communicate with you**

Stoll 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 Tenancy'.

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

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 in writing.

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

Stoll shares limited personal data with our contractors or their subcontractors, who are carrying out services on our behalf to run our out-of-hours services or to complete emergency, responsive or planned property repairs. Our contractors are required to comply with the law to ensure data is managed appropriately and for specified purposes.

Other organisations who may share your data include:

- Military support services and charities
- Health services
- Foreign Language translation services, if required
- Government departments and agencies
- Regulators
- Auditors
- Utility companies
- Other organisations and agencies where we are legally allowed to do so.

## **11. What we will not do**

- We will not send you unsolicited marketing material.
- 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.
- We will not keep your information longer that is required for business purposes or for legal reasons.

## **12. Your rights**

Our processing of your information should be fair and lawful.

We should obtain your personal information only for specified purposes and each purpose should have a lawful basis. We won't use it for a purpose that is incompatible with the original purpose, unless we have your agreement or the law requires it.

The information should be relevant and adequate and no more than is needed. When we can we will modify it so it doesn't identify you. However, in most cases it will only serve a purpose if it is clear that it is about you.

It should be accurate and up-to-date.

We won't retain it for longer than we need to. We follow national guidance including the National Housing Federation's guidance on document retention.

We will employ measures to ensure security compliance by working towards a framework to ensure confidentiality, integrity and availability of your data. We will have security policies in place and will apply a risk based approach to the protection of personal data using appropriate technology, robust procedural controls and continual assessment of the effectiveness of these controls.

You also have the right of access to your information and for it to be rectified as appropriate.

You have the right to portability so that your information can be used in different settings.

In certain circumstances, you have the right to object to processing, for processing to be restricted, and even for the information itself to be erased.

Underlying all these rights you have the right to complain or raise concerns. You should contact the Data Protection Officer, telephone number 020 7385 2110; email: [info@stoll.org.uk](mailto:info@stoll.org.uk)

You can also complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone number 0303 123 1113 local rate or 01625 545 745 if you prefer to use a national rate number

### **13. Who we are**

Stoll is a Registered Social Landlord (RSL) regulated by the Homes and Communities Agency (HCA) (registration number A3418) and a Charity, Registered with the Charity Commission (registration number 207939)

We own 257 properties in across West London, support approximately 1000 Veterans each year and employ around 50 staff.

Stoll is the Data Controller whose head office is located at Sir Oswald Stoll Mansions, 446 Fulham Road, London, SW6 1DT Tel: 020 7385 2110.

The company Data Protection Officer can be contacted at [info@stoll.org.uk](mailto:info@stoll.org.uk) or 020 7385 2110.

Stoll is registered with the Information Commissioners Office registration number: Z6043765

### **14. Changes to our Fair Processing Notice**

Our Fair Processing Notice is regularly kept up to date, so please do check it from time to time at our website [www.stoll.org.uk/policies](http://www.stoll.org.uk/policies) . We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided and putting up notices at our schemes.