HOW WE USE YOUR PERSONAL DATA (full policy)

This privacy notice tells you what to expect when Octavia processes personal information. It applies to information about applicants, residents and other service users.

Why do we collect and store personal information?

Octavia needs to collect, process and store personal information about you and other household members (when you provide information about household members we assume that you do so with their full knowledge and consent) in order to operate as a registered provider of affordable housing and deliver efficient and effective services.

Information we may hold about you and how we use it

The information we hold on our records concerns our relationship with you. For example:

- We hold names & dates of birth, photographic ID and information about your previous housing circumstances to assess housing applications and help prevent tenancy fraud.
- We hold contact details for you so we can communicate with you by your preferred means, and keep you informed about services we offer which may be useful to you.
- We record information about your needs (for example if you have a carer or social worker; if you need adaptations in your home; if you need large print or translated text) to ensure that we take account of any support needs in our dealings with you, and to improve our communications with you.
- We record information to enable us to provide housing management services. For example we record reports of anti-social behaviour; complaints; change in circumstances (for example when your employment status changes etc) and information about housing options (e.g. if you have a medical need which means you need to move).
- We keep financial records about the amount of money you have paid us; any amount(s) outstanding and action taken to recover money you owe.
- We may hold information about you if you are engaged with our additional guidance and support services. For example in connection with access to training and employment we may hold information about your job history and skills and experience, or if we support you to improve your financial circumstances, we may hold information about your household income and expenditure.
- We may record your telephone calls to our switchboard for training and monitoring purposes to ensure we’re delivering a good service. Any call recordings will be held in accordance with our corporate retention policy before being erased.
- We may capture your image on our CCTV systems if you visit a property, office or community facility which is covered by this facility. Any CCTV recordings will be held in accordance with our corporate retention policy before being erased.
• We record the findings of surveys and other research to help us improve our service to customers. The information you provide will be anonymous unless you agree that we can use your details.

This list is not exhaustive, as we hold records of most contacts we have with you, or about you, and we process this information so we can deliver services to you. Generally the information we hold will have been provided by you (on application 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 circumstances e.g. from social workers and health professionals (such as doctors 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.

**How we manage your personal information**

We process your personal information in accordance with the principles of the Data Protection Act 1998.

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.

Access to personal information is restricted to authorised individuals on a strictly need to know basis.

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 may ask you security questions to confirm your identity when you call us. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so.

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us (for example if you live in one of our properties we will hold information about you for the duration of your tenancy. If you move, and are no longer a resident we will usually keep records about you for up to 6 years.

**Sharing your personal information**

Normally, only Octavia staff will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties for the purposes as outlined in section two, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the Data Protection Act. Sensitive information about health, sexual life, race, religion and criminal activity for example is subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share information as follows:
• With our contractors, in order to undertake repairs, maintenance or improvement works.

• With third party service providers, in connection with services performed on our behalf. Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols.

• With other housing associations, trusts and landlords, in connection with tenancy references and associated enquiries.

• With community partners in connection with the delivery of coordinated local services.

• With utility companies and their representatives, in connection with unpaid bills (gas, electricity & water).

• With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges owed once residents leave their Octavia Housing home.

• 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 & Communities Agency (HCA), to comply with our regulatory 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 personal information

Under the Data Protection Act, you have a right to ask us what personal information we hold about you, and to request a copy of your information. This is 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 identify. We also charge a £10 processing fee, which can be paid by cheque or postal order payable to 'Octavia Housing'. We then have 40 calendar days 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).
Following your SAR, we will provide you with a copy of the information we hold that relates to you. This will not generally include information that relates to your property such as repair logs or details of contractor visits, as this is not considered personal information. If you need us to correct any mistakes contained in the information we hold about you, you can let us know by contacting your neighbourhood officer, leasehold services officer, supporting housing officer or alternatively, contact customer services at info@octavia.org.uk

Changes to this privacy notice

We keep our privacy notice under regular review and will place any updates on our website; you will be notified of any major changes to this policy.

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:

Secretariat Department, Octavia Housing, Emily House, 202 – 208 Kensal Road, London W10 5BN | 020 8354 5500 | info@octavia.org.uk

The Information Commissioner (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 Data Protection Act 1998.

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF | 0303 123 1113 | http://www.ico.org.uk/