

## Our full Privacy Notice

### Introduction

Your privacy matters. As a trusted landlord, Wythenshawe Community Housing Group will always respect your right to a private life, and we are committed to keeping your personal data as safe as the homes we provide. This privacy notice explains how we look after your personal data and tells you about your privacy rights and how the law protects you.

The Group's privacy notice applies to information about tenants, leaseholders, residents and other service users (we refer to all types of service user as 'customers' throughout this notice). This is the main privacy notice for us. However, some of our services may have additional privacy notices which will be provided to you when you sign up for the service.

We keep our privacy notice under regular review, and we will place any updates on our website. We've tried hard to use plain English and avoid using legal jargon because we believe that's the best way to explain privacy rights. [We have also produced a summary version](#). So it's worth coming back to this page now and again to keep an eye on the [personal information we collect and use](#), and your [rights over it](#).

If you would like to receive a hard copy of our privacy notice, please let us know. You can contact the Information Governance team about any of the information in this notice, or provide feedback on how useful you found it, at [informationgovernance@wchg.org.uk](mailto:informationgovernance@wchg.org.uk).

### Who is responsible for my personal data?

Wythenshawe Community Housing Group includes our subsidiary organisation, Garden City Homes.

We also run the following community initiatives:

- Woodhouse Park Lifestyle Centre
- Benchill Community Centre
- Village 135.

We know that circumstances change all the time. We appreciate that it's another task to remember, but as a responsible housing provider, it's important that the personal data we hold about you is accurate and current. So please keep us informed if your personal data changes during your relationship with us.

## **What information about me do you collect and use?**

We need to process personal data (such as your name, address and data of birth) so that we can “provide good quality homes and services to our tenants and leaseholders and to play a leading role in creating safer, healthier communities” (for more information on how we do this, please read our [purpose and principles](#)).

We will only collect personal information when we need it. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this.

Where the information being collected relates to household members, it is in our legitimate interests to know who will be living in our premises, to check that accommodation offered is adequate for current and near future needs of the household.

## **Processing your sensitive data**

As well as personal information we may collect sensitive personal information (also known as special categories of data) which may include:

- racial or ethnic origin
- religious or philosophical beliefs
- sexual orientation
- health information.

We will ask for your explicit informed consent at the time of collecting this type of data. Where you provide consent for us to process sensitive personal information, you have the right to withdraw this consent at any time. We may have a legal or contractual obligation to hold onto and process this information.

We will apply additional security and confidentiality measures when processing your sensitive personal information.

## **Processing your image on Closed Circuit Television (CCTV)**

We may capture your image on our CCTV systems if you visit an estate, office or community facility which is covered by this facility.

Processing of this information may be required to meet our legal obligations and our legitimate business interests to assist with personal security and the prevention and detection of crime.

## **Using Automated Processing and Artificial Intelligence (AI) to deliver targeted services**

Artificial Intelligence (AI) is an emerging technology which mimics intelligent human behaviours. With appropriate use of accurate data, AI can help us to improve our decision making and solve problems by providing insights, predictions, and solutions.

Automated decision-making is the process of making a decision by automated means without human involvement. In the event any automated decision reached by our use of AI technology has a legal or significant effect on our customers, it will be reviewed by an individual working on behalf of us.

Several other safeguards are in place to protect your information where it is used to automate our business processes. These include:

- implementing a strict policy to ensure that the protection of personal data remains of the utmost importance in our use of AI
- carrying out Data Protection Impact Assessments (DPIAs) before launching an AI-driven process
- ensuring there is a suitable 'lawful basis' (see next section) for any data being processed, and
- providing you with a method to contest a decision based solely on automated processing of your personal data, and enabling you to obtain human intervention in respect of such decisions (see: [What are my information rights?](#)).

Further information on the lawful basis and retention period used for our automated decision-making processes, including customer segmentation, is available in the relevant stages of your [Personal data journey](#).

## **Cookies**

Cookies are small text files that are sent by websites that you visit to recognise who you are when you return there. The files are stored on your computer's hard drive and are read by your web browser.

There are several options available over our use of cookies. You can either set your browser so that it will not accept and store any cookie, or allow only certain 'trusted' sites to store cookies on your computer.

[More information on the cookies used on our website.](#)

## **My personal data journey**

You can click on the links below to understand more about your personal data journey with us.

## **Explaining lawful bases and retention periods**

Under the data protection laws there are six legally recognised reasons we can rely on to process our customers' data, called 'lawful bases'. Most often the lawful bases we choose to rely on are where we have a legal obligation to do so, where it is part of fulfilling our contract with you, if we have your consent or where it is in our 'legitimate interests' to process your personal data. In these cases we must be able to demonstrate that our interests in using your data are consistent with your own rights and interests.

The lawful bases we have chosen to rely on for each of the purposes we may use your personal data for are shown in the tables within each stage of your customer journey. We also need to abide by rules and regulations around the length of time we can hold your personal data, depending on the lawful basis we are relying on to use it for a specific purpose.

In the customer journey tables we have included the length of time we can retain (hold) your data next to each purpose we use it for. These are called 'retention periods'. If we don't have a valid purpose for using your information anymore, we may need to delete it regardless of these retention periods.

## 1. I apply and sign up for a home

We collect certain information about you when you apply for one of our homes, in order to manage your application and provide you with accommodation. Most information we hold will be collected from you, or will be provided to us by the 'Manchester Move' system when you use it to register an interest in our homes, but we may also obtain this from third parties such as local authorities, previous landlords, your doctor (or other health professional), or other relevant partners.

We take your photograph when you sign up for a home and when the housing composition changes or a reasonable period of time has passed (this applies to all household members over the age of 18).

We may continue to hold information about your history, for example regarding credit status or offences, if we need it to look after our colleagues, business or anyone else.

### Lawful Basis and Retention Details

| Purposes for using personal data   | Types of personal data used   | Lawful Basis   | Retention period              |
|--|---|--|-------------------------------|
| We receive an application for a tenancy  | Name, contact details, repairs information, tenancy information   | For the performance of a contract (tenancy agreement) with the customer                        | End of tenancy plus six years |
| We need to process a customer's personal data via the 'Manchester Move' application portal | Name, contact details, address, date of birth, employment information, previous tenancy information, financial information    | For the performance of a contract (tenancy / leasehold agreement) with the customer            | Six months                    |
| Verifying identity   | Identification documents, photograph of you / household members   | It is our legal obligation to prevent fraud  | Deleted once scanned          |
| Creating and managing the customer's profile   | Age, sex, date of birth, ethnicity, income, National Insurance number, income and benefits details, employment status, gender | It is in our legitimate interests / there is substantial public interest to ensure equality of | Six years from end of tenancy |

|                  |  |   |                                     |
|------------------|--|---|-------------------------------------|
|                  | identity, relationship status, any disabilities, any communication and accessibility requirements, religion, sexuality, nationality, caring responsibilities, access to financial services such as banks and credit unions, bank details, benefits, council tax, medical information, details of any unspent criminal convictions. | opportunity or treatment and prevent or detect unlawful acts                        |                                     |
| Assigning a home | Proof of residency, lead tenant / leaseholder name, contact details and date of birth, financial information, next of kin / household members' names, contact details and dates of birth*  | For the performance of a contract (tenancy / leasehold agreement) with the customer | Kept until decision made on tenancy |

\* When you provide information about household members we assume that you do so with their full knowledge and permission.

## 2. I move into my home

Once you've moved into your new home we will use the contact details you will have provided at sign-up (see ['I apply and sign up for a home'](#)) to reach you or visit you at home. We might use these details to discuss issues relating to your tenancy or lease, like collecting rent or service charge payments, arranging access for maintenance and improvements, carrying out home surveys or resolving housing management issues such as anti-social behaviour.

If you have a preferred method of contact, you can make this known to us, but we will use all means of contact available should we need to contact you in the event of an emergency or to enforce the terms of your tenancy/lease. You should let us know as soon as possible if any of your contact details change once you've moved in.

We will continue to hold and use your personal data for several other purposes listed in the table below. This includes records of all our contact with you, your contact with us and any contact from third parties representing you. When you contact our Helpline, we will record our calls with you (see ['My personal data is used to help us understand how it's performing and comply with regulations'](#)).

We will also record details of any change in your circumstances (for example, if you have a medical need that means your housing requirements need to be re-assessed we would ask you for supporting information about your change in health needs) or to make any changes to your tenancy (for example, if you want to change your name on our records we'll ask you for a copy of your marriage or deed poll certificate).

### Lawful Basis and Retention Details

| Purposes for using personal data  | Types of personal data used  | Lawful Basis   | Retention period   |
|---|--|--|--|
| Sending rent statements / leaseholder service charge demands and statements | Name, address, financial information   | For the performance of a contract (tenancy / leasehold agreement) with the customer                    | Six months   |
| Taking payments for rent  | Name, address, financial information   | For the performance of a contract (tenancy / leasehold agreement) with the customer                    | Six years from end of tenancy  |
| Issuing refunds   | Name, contact details, address, financial information, Identification, photographs   | For the performance of a contract (tenancy / leasehold agreement) with the customer                    | Six years from end of tenancy  |
| Matching and sharing information on a current tenant to prevent fraud       | Name, address, date of birth, national insurance number, financial information       | It is a legal obligation and in our legitimate interests to prevent social housing fraud               | Six years from end of tenancy  |
| Delivering repairs and maintenance  | Name, address, contact details, additional information such as property requirements | For the performance of a contract (tenancy / leasehold agreement) with the customer                    | Six years from end of tenancy  |
| Contacting customers to carry out planned works to home                     | Name, address, contact details, description of the works                             | For the performance of a contract (tenancy / leasehold agreement) with the customer                    | Deleted once works have been completed                                 |
| Carrying out home condition surveys   | Name, contact details, Customer Alert information, health data                       | It is in our legitimate interests / there is substantial public interest to support individuals with a | Until the end of the five-year term of the agreement with the surveyor |

|  |  |   |   |
|--|--|---|---|
|  |  | disability / medical condition  |   |
| Using smart sensory equipment in a home at risk of damp and mould                | Name, address, contact details   | It is in our legitimate interests to keep our homes free of damp and mould and avoid potential disrepair claims   | End of contract   |
| Conducting fire risk assessments   | Photographs of parts of the home   | It is our legal obligation to keep our buildings and customers safe   | Updated annually  |
| Helping evacuate people in an emergency  | Flat number, health data   | It is our legal obligation to keep our buildings and customers safe / there is substantial public interest to support individuals with a disability / medical condition   | Reviewed every 6 months or as when their circumstances change |
| Customer requests service or updates contact details via phone / online channels | Name, contact details, address, date of birth, start date of tenancy, information about service requested, disability / pregnancy information, health data   | For the performance of a contract (tenancy / leasehold agreement) with the customer / there is substantial public interest to ensure equality of opportunity or treatment | One year  |
| Customer visits an office to provide information / identification documents      | Name, contact details, date of birth, application number, address, household details, national insurance, employment information, financial information, health data, identification documents, photograph | It is our legal obligation to prevent fraud / there is substantial public interest to prevent or detect unlawful acts   | Deleted once scanned  |

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|   | of you / household members   |  |  |
| Customer reports Anti-social behaviour (ASB)      | Name, address, details on incident, supporting evidence that includes third party names, photographs, video recordings, audio recordings | It is in our legitimate interests / there is substantial public interest to prevent or detect unlawful acts  | Six years from case closure  |
| Use of Noise application for ASB cases            | Name, data captured by sound recording device  | It is in our legitimate interests / there is substantial public interest to prevent or detect unlawful acts  | Deleted once the case has been closed                                |
| Recording call notes                              | Name, address, service request information, disability and pregnancy information, health data  | For the performance of a contract (tenancy / leasehold agreement) with the customer  | Six years from end of tenancy  |
| Recording customer alerts (at customer's request) | Name, customer profile information, health data  | Explicit consent provided  | End of our relationship  |
| Recording customer alerts (internal request)      | Name, meeting notes referring back to the data subject, customer profile information, health data, criminal conviction data              | It is in our legitimate interests / there is substantial public interest to support individuals with a disability / medical condition and prevent or detect unlawful acts and protect the public | Reviewed every six months and deleted when no longer relevant/needed |
| Recording customer alerts (from a third party)    | Name, contact details, data of birth, address, criminal conviction data, health data   | It is in our legitimate interests / there is substantial public interest to prevent or detect unlawful acts  | Six years from end of tenancy  |

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| Third party access to the customer's account | Name, contact details, data of birth, address, relationship, signature | Explicit consent provided   | Two years  |
| Customer notifies us of a change of name     | Name, contact details, proof of name change, marriage certificate      | For the performance of a contract (tenancy / leasehold agreement) with the customer | Within six months, until the customer profile is updated |

### 3. I find out about services you provide or join up to events you run

We take every step to ensure our services are accessible, that we take account of any support needs in our dealings with you and to improve our communications with you. For example, if you are involved with a carer, social worker or other advocate, if there are considerations we need to apply when we visit you at home, or if you need large print or translated text.

We will keep you updated 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 and where this will assist us in meeting our objectives to transform lives and communities.

This information could include accessing training and employment, financial guidance, energy efficiency and digital support. We would also like to keep you up to date with news and events in your area, including how to join classes and activities provided through the community centres we run.

It's a legitimate business interest for us to send you postal communications (from time to time) which may comprise information about all these areas of our work. You can object to receiving this type of content from us in the post.

Before sending electronic communications of this nature, we will follow the law and guidance which requires us to seek your consent. This includes the use of platforms such as WhatsApp to provide relevant service information, updates and support where possible. Your contact details will only be used in this way where you have agreed/given consent and you can change your mind at any time. Please just contact us or follow the 'unsubscribe' instructions that will be available on all our promotional publications.

We will never sell your personal data to third party organisations for marketing purposes.

#### Lawful Basis and Retention Details

| Purposes for using personal data                | Types of personal data used | Lawful Basis  | Retention period              |
|---|-----------------------------|---|-------------------------------|
| Sending newsletters to tenants and leaseholders | Name, address               | It is in our legitimate interests to tell you about our housing and | Six years from end of tenancy |

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|  |   | community services  |  |
| Providing service information by email / SMS to tenants and leaseholders                                   | Name, address, contact details, age, ethnicity, sexual orientation, disability, religion  | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment                             | Seven years from the year the service information was sent |
| Providing service information by WhatsApp to tenants and leaseholders                                      | Name, address, contact details, DOB, employment information, financial information, next of kin, tenancy start date, repair info, emergency contact details, tenancy information, household information, third party details, type of property, benefits/universal credit, photographs, EDI data, disability information, vulnerability data, health data | It is in our legitimate interests/ there is substantial public interest to ensure effective communication regarding important updates and services. | 90 days via automatic disappearing messages feature        |
| Providing information about employment, financial or digital support for tenants and members of the public | Name, contact details, employment information, financial information, digital inclusion information, ethnicity, sexual orientation, disability, religion  | The participant consents to receiving the information / there is substantial public interest to ensure equality of opportunity or treatment         | End of the relationship                                    |
| Sharing information with 'Rainbow Roofs' to support a LGBTQ+ customer                                      | Name, contact details, sexual orientation   | Explicit consent provided   | End of the relationship                                    |
| Providing community groups, sessions and events  | Name, contact details, case notes   | The participant consents to engaging in the group / event   | End of the relationship                                    |
| Providing memberships for activities such as classes and hiring of rooms etc.                              | Name, contact details, next of kin, date of birth   | For the performance of a contract (centre membership) with the participant  | Removed if membership is inactive for two years            |

#### **4. I access support services you provide**

You may wish to access additional guidance, advice and support services during your tenancy or leasehold with us. For example, if you need help to get back to work or if you're trying find a different job, we may hold information about your education, job history and skills and experience. If we support you to improve your financial circumstances, we may hold detailed information about your household income and expenditure. And if you ask us for support to manage your tenancy successfully we will hold detailed information about your needs and your family's needs. Where relevant, we may hold records of payments for the services provided to you.

Residents who need additional care and support may live in sheltered schemes or extra care facilities, like Village 135. These sites have local physical and electronic controls to keep customers and their personal data safe and secure, including information sharing protocols, key fobs and [CCTV](#).

We also run youth projects and play sessions through our centres for young people aged six – 19 years (up to 25 with additional needs). We invite young people to help us plan and evaluate youth activities in the community through the Wythenshawe Youth Forum. We will take extra care to look after any data we collect on young people, either collecting their consent to hold it once they have turned 13, or by asking their parents' permission below this age.

Some of our projects require us to share personal data with councils, health bodies or government departments, such as the National Health Service (NHS), Department of Work and Pensions (DWP) and Greater Manchester Combined Authority (GMCA). We will always protect this data when we share it with a third party, by anonymising it before sharing, or providing it in a form where it cannot be re-identified without access to a 'key'.

Provision of information requested by us may form part of a 'Contractual Requirement'. Without this information, we may not be able to provide this service. We will make it clear at the point of data collection whether the information is voluntary.

We sometimes receive requests from statutory agencies to share information about children, young people and adults where there are safeguarding and child protection concerns. We have a duty to record and share information with statutory agencies under these situations. This is referred to as a duty to cooperate. Our duty to cooperate is outlined in The Care Act 2014 and the Children's Act 2004. We will always share information in a sensitive, safe and secure way.

### Lawful Basis and Retention Details

| Purposes for using personal data  | Types of personal data used  | Lawful Basis  | Retention period              |
|---|--|---|-------------------------------|
| Outgoing phone call made by us to a tenant to offer financial inclusion support                         | Name, address, contact details, date of birth, financial information, health data, vulnerability data  | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment | Six months                    |
| Tenant is supported to make a benefit claim   | Name, address, tenancy start date, vulnerability information, health data  | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment | End of tenancy                |
| Employment support for both tenants and members of the public   | Name, contact details, employment information, health data, ethnicity, sexual orientation, disability, religion  | Explicit consent provided   | End of the relationship       |
| Customer with health-related employment support needs is referred to the NHS funded 'Be Well' programme | Name, address, contact details, date of birth, health data, ethnicity, sexual orientation, religion  | Explicit consent provided   | End of support plus two years |
| Customer with long term employment support needs is referred to the DWP funded 'Motiv-8' programme      | Name, address, contact details, date of birth, national insurance number, next of kin, economic status, biometrics, genetic / health data, ethnicity, sexual orientation, religion | Consent provided / the processing is necessary for the provision of health or social care                               | End of support plus two years |
| Customer is referred to the Greater Manchester 'Support to Succeed' employment opportunities scheme     | Name, address, date of birth, national insurance number, economic status, criminal convictions data, health data, ethnicity, sexual orientation, disability, religion              | To maintain our contract with the supported customer / explicit consent provided  | End of contract               |

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| Tenant is supported to access the 'Living Well' fund                                    | Name, address, contact details, vulnerability information, health data   | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment  | End of tenancy                             |
| We need to help a tenant settle into and manage their tenancy successfully              | Name, contact details, date of birth, address, case notes / report on the individual, health data, ethnicity, sexual orientation, disability, religion | Explicit consent provided  | Eight years from end of support            |
| Customer lives in a sheltered / extra care scheme                                       | Name, address, contact details, date of birth, next of kin, disability and vulnerability information, health data                                      | For the performance of a contract with the supported customer / it is in our legitimate interests and substantial public interest to support individuals with a disability / medical condition | End of the scheme tenancy plus seven years |
| Delivering youth and play services  | Name, address, contact details, date of birth, next of kin, ethnicity, disability, health data   | For the performance of a contract with the young person / there is substantial public interest to ensure equality of opportunity or treatment  | End of the relationship                    |
| Delivering 'Staying Close' support to a young person leaving care in Greater Manchester | Name, contact details, address, case notes / risk to individual, health data, ethnicity, sexual orientation, disability, religion                      | It is in our legitimate interests / there is substantial public interest to safeguard children and individuals at risk   | End of the relationship plus seven years   |
| A safeguarding report is made on a customer / resident / member of the public           | Name, address, contact details, date of birth, report on the individual, disability and vulnerability information, health data                         | We have a legal obligation to report a safeguarding concern / there is substantial public interest to prevent or detect an unlawful act  | 10 years                                   |
| Customer or member of public  | Name, contact details, date of birth, address,   | We have a legal obligation to report a   | While case continues                       |

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| is referred to a multi-agency partnership meeting | case notes / report on the individual, criminal conviction data, health data, sexual orientation / sex life | safeguarding concern / there is substantial public interest to prevent or detect an unlawful act |  |
|---|---|--|--|

## 5. My personal data is used to help us understand how it's performing and comply with regulations

As a responsible social housing provider it is in our legitimate interests to understand how we are performing so we can meet our [purpose and principles](#) and to measure the impact of our services. There may also be a legal obligation for us to share deidentified information with our Board and central government departments, or to demonstrate to our regulators that we are fulfilling our obligations, for example to provide inclusive services and check they are being delivered appropriately.

Examples of using your personal data for these purposes include:

- undertaking call recordings for training and quality monitoring purposes
- using your contact details to carry out market research and customer satisfaction surveys to help us to monitor our performance and to improve our services to our customers
- managing and analysing complaints
- recording CCTV footage and keeping it for a limited period of time
- responding to Subject Access Requests (SARs) from customers and to the Information Commissioner regarding complaints about our handling of SARs
- creating statistical analysis in reports, dashboards and other performance documents
- managing insurance claims
- managing our records, ensuring our data is of good quality and storing documents securely in line with our retention periods.

We may use the personal data we collect from you to create customer 'segments' to help target our resources and prioritise services. In addition, we may also obtain information from publicly accessible sources or engage the service of market research organisations to validate, or where appropriate, enhance the information that we hold.

The government has created a national system to assess how well social housing landlords in England are doing at providing good quality homes and services. As a result, we're required to survey our tenants and ask a set of questions that determine their satisfaction with the services we provide. These are known as tenant satisfaction measures (TSMs).

The scores derived from the responses to the TSMs questionnaire will:

- be published and reported to the Regulator of Social Housing annually
- let tenants see how well we're doing against other landlords

- give the regulator an idea of which landlords might need to improve things.

### Lawful Basis and Retention Details

| Purposes for using personal data   | Types of personal data used  | Lawful Basis   | Retention period              |
|--|--|--|-------------------------------|
| Phone call between a customer and us is recorded for training and quality monitoring purposes    | Contents of call recording related to the individual   | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment  | Six months                    |
| Recording CCTV footage of a customer or member of the public                                     | Video footage of tenants, leaseholders and members of the public                             | It is in our legitimate interests to keep our colleagues and customers/members of the public safe and to enable us to take meaningful action where appropriate | One month                     |
| We receive a complaint or other form of customer feedback  | Name, address, vulnerability data occasionally, disability, medical needs                    | We have a legal obligation to be able to investigate / respond to complaints, in line with the Housing Ombudsman's complaint handling code                     | Six years from end of tenancy |
| Customer makes a request for their information   | Contents of the SAR related to the individual (data subject)                                 | The data subject provides consent for the information to be processed by exercising their right of access  | Two years                     |
| Customer complains to the Information Commission about our handling of their information request | Contents of the SAR related to the data subject, information about how the SAR was processed | The data subject provides consent for the information to be processed by exercising their right to complain  | Six years                     |
| Creating customer 'segments' or profiles   | Name, address, email, contact number, emergency contact, date of birth, company name if      | The information is kept in our legitimate interests / there is substantial public interest to know our customer demographic and to                             | Six years                     |

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|---|---|---|-------------------------------|
|   | applicable, age bracket, household information, economic status, employment information, disability information, sexual orientation   | be able to understand their wants/needs of services that are in line with regulations   |                               |
| Compiling tenant satisfaction measures                                  | Name, address, contact details, date of birth, property type, ethnicity, sexual orientation, disability   | We have a legal obligation to carry out tenant satisfaction surveys / there is substantial public interest to ensure equality of opportunity or treatment | Six years                     |
| Collecting data from vulnerable customers to provide inclusive services | Name, address, contact details, date of birth, national insurance number, language, emergency contact, advocate details, customer profile information, third party details, household information*, tenancy information, customer alerts proof of name change, information about other residents, data, disability information, vulnerability data, health data, pregnancy data, sexual orientation, religious or philosophical | It is in our legitimate interests to collect information from vulnerable customers where necessary to help us provide accessible services.                | End of tenancy plus six years |

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|--|---|---|-------------------------------|
|  | beliefs, racial or ethnic origin  |   |                               |
| Analysing and reporting responses to our satisfaction surveys  | Name, contact details   | It is in our legitimate interests to monitor satisfaction with our services   | Six years from end of tenancy |
| Creating reports to go to our Committees or Board for analysis and intervention                                  | Name, contact details, address, employment information, health data, ethnicity, sexual orientation, disability, religion  | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment | Six years from end of tenancy |
| Monitoring of building / heating system performance  | Name, contact details, building performance statistics  | For the performance of a contract (tenancy / leasehold agreement) with you  | Six years from end of tenancy |
| Providing an insurance programme to manage claims against us   | Name, contact details, address, employment information, health data, ethnicity, sexual orientation, disability, religion  | It is in our legitimate interests / there is substantial public interest to provide an insurance programme              | End of claim                  |
| Storing a customer's documents attached to customer records in Docuware for secure document management/retention | Tenant Name, Address, Tenancy Information, Property Type, Tenancy Reference, Job Number, Description, Document Date, Store Date   | It is in our legitimate interests to store and manage customers' documents securely                                     | TBC                           |
| Ensuring a customer's data is of good quality  | Name, address, contact details, data of birth, third party details, ID, national insurance number, customer alerts, disability information, health data, vulnerability data, racial or ethnic | It is in our legal obligation to process customer data to ensure it is accurate and up to date                          | Six years                     |

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|  | origin, religious or philosophical beliefs, sexual orientation, pregnancy data |  |  |
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\* When you provide information about household members we assume that you do so with their full knowledge and permission.

### 6. I apply to buy my home or want to access another home ownership route

Provision of information requested for this purpose is required in preparation for entering into ‘contractual relations’. Without this information, we will be unable to manage this legal process.

Where the processing of information concerns household members, it is in our legitimate interests to do this; for example, to ensure we understand all legal effects that a process may have.

#### Lawful Basis and Retention Details

| Purposes for using personal data   | Types of personal data used  | Lawful Basis  | Retention period                            |
|--|--|---|---|
| Direct marketing of available homes  | Name, contact details  | Consent provided  | Until consent is withdrawn                  |
| Customer applies to purchase a home  | Name, address, contact details, date of birth, next of kin, identification documents, proof of income, employment information, financial information | It is in our legitimate interests / there is substantial public interest to ensure equality of opportunity or treatment | One year                                    |
| Customer purchases their home under the ‘Right to Buy’ scheme                | Name, address, identification documents, household information, third party details, financial information, vulnerability / health data              | We have a legal obligation to process the information to manage the right to acquire process                            | One year                                    |
| We need to recover debts from a customer with shared ownership of their home | Name, address, financial information   | It is a legal obligation to process arrears information under the ‘mortgage guarantee scheme’ in order to recover debts | Length of the mortgage held by the customer |

## 7. I apply for a job with you

If you have expressed an interest in applying for a job or apprenticeship with us, you are providing your consent to receive information from [Networx Recruitment](#) related to job or apprenticeship opportunities with us. You can opt out of receiving such communications at any time.

Some of our recruitment campaigns are directly managed for us by Networx. We will hold your details securely for a period of up to 12 months, unless otherwise specified, and will not pass them to a third party or agency without your permission.

### Lawful Basis and Retention Details

| Purposes for using personal data  | Types of personal data used  | Lawful Basis  | Retention period   |
|---|--|---|--|
| Processing an application to join us  | Name, address, contact details, employment information, financial information, ethnicity, sexual orientation, disability, religion       | It is in our legitimate interests / processing is necessary to carry out our obligations and for individuals to exercise their rights in the field of employment  | One year   |
| Processing of a 'Disclosure and Barring Service' (DBS) check in relation to an application to join us | Name, address, date of birth, next of kin, identification documents, risk of individual, financial information, criminal conviction data | We have a legal obligation to carry out background checks on the applicant / processing is necessary to carry out our obligations and for individuals to exercise their rights in the field of employment | Up to six months while the application is in progress. We do not retain ID documents or the DBS certificates once the check is complete and the originals are seen |
| Processing of an apprenticeship agreement to work with the learning provider                          | Name, contact details, report on the individual, line manager details, health data, ethnicity, sexual orientation, disability, religion  | For the performance of a contract with the apprentice   | End of employment plus six years   |
| Legal advice delivered to us upon request   | Name, address, photographs, video footage  | It is in our legitimate interests to settle claims brought against us by applicants   | Until the claim is settled, plus six years, deidentified advice  |

|  |  |  |                       |
|--|--|--|-----------------------|
|  |  |  | retained indefinitely |
|--|--|--|-----------------------|

**8. I move out of my home or apply to be re-housed**

If you apply to be re-housed by us, we will process your personal information to process your application and upload information to the national re-housing register. We will need to use ‘special category’ (sensitive) data about the re-housing application to ensure that you are treated fairly and equally. Like other housing providers, we have a legal obligation to record re-housing applications on the national register, but your personal information will not be identifiable once it’s published.

We will also use your contact details and other information about your circumstances, such as financial, employment or criminal convictions data, to recover debts or prevent fraud or if you are no longer occupying your home. In most cases it will be in our legitimate interests or a contractual obligation to process this information, but we will only use the minimum amount of personal data needed to terminate or re-assign your tenancy.

**Lawful Basis and Retention Details**

| Purposes for using personal data                                    | Types of personal data used  | Lawful Basis  | Retention period                     |
|---|--|---|--------------------------------------|
| We receive a rehousing application                                  | Name, address, contact details, date of birth, national insurance number, previous tenancy information, employment information, financial information, identification documents, disability and vulnerability information, criminal conviction data, health data, sexual orientation, religion | For the performance of a contract (tenancy agreement) with the customer / there is substantial public interest to ensure equality of opportunity or treatment | Two years                            |
| Sharing information about a re-housed customer on the national list | Age bracket, employment information, previous tenancy information, household information, information about other residents, ethnicity   | It is a legal obligation to share this information / there is substantial public interest to ensure equality of opportunity or treatment                      | End of the relationship plus 6 years |
| Customer applies to let their home                                  | Name, address, contact details, date of birth, next of kin, identification documents, household information, employment  | It is in our legitimate interests / there is substantial public interest to prevent fraud   | End of the relationship              |

|   |   |  |                                     |
|---|---|--|-------------------------------------|
|   | information, financial information, biometrics  |  |                                     |
| Customer successfully lets their home                             | Name, address, contact details, next of kin, identification documents, proof of income, employment information, financial information, biometrics | For the performance of a contract with the customer / there is substantial public interest to prevent fraud  | Six years                           |
| Processing customers' mutual exchange of properties               | Name, ID, national insurance number, contact details, proof of income, references, household information*, criminal conviction data, health data  | For the performance of a contract (tenancy allocation / agreement with the customer / there is substantial public interest to ensure a fair allocation of properties | Six months                          |
| We need to repossess a customer's home                            | Name, address, financial information  | For the performance of a contract (tenancy agreement) with the customer  | Six years from end of tenancy       |
| We need to process the customer's data when they abandon the home | Name, address, date of birth, vulnerability information, criminal conviction data   | It is in our legitimate interests / there is substantial public interest to prevent or detect unlawful acts  | End of the relationship             |
| Customer reaches end of life                                      | Next of kin name and contact details  | For the performance of a contract (tenancy agreement) with the deceased customer   | Six years from end of tenancy       |
| Recording rent owed by a former customer                          | Name, address, financial information  | It is a legal obligation to process arrears information in order to recover debts  | Six years from end of tenancy       |
| Adding a customer to the succession form                          | Name, contact details, date of birth, financial information, national   | For the performance of a contract (tenancy   | Kept until decision made on tenancy |

|  |   |   |                                     |
|--|---|---|-------------------------------------|
|  | insurance number, household information*  | agreement) with the customer  |                                     |
| Reassigning a home to a household member | Name, contact details, date of birth, proof of residency, previous tenancy information, financial information, health data* | For the performance of a contract (tenancy / leasehold agreement) with the customer / there is substantial public interest to ensure equality of opportunity or treatment | Kept until decision made on tenancy |

\* When you provide information about household members we assume that you do so with their full knowledge and permission.

### Who will you share my personal data with?

Sometimes we need to share personal information we hold about you, our contractors, suppliers and partners, so they can deliver services with us or on our behalf. When sharing your information we will comply with all aspects of data protection law.

Where the information is of a sensitive nature, for example about your health, we will generally obtain consent from you prior to sharing this information, unless we are required or permitted to share this by law.

Where sharing information is either in our as a business or your legitimate interests, we may on occasions share some of the information we have about you with other organisations without your consent. This may be to provide additional services, to fulfil a legal obligation or to ensure you get the best service possible.

For example, we may forward your details on to utility companies to ensure that you're supplied with energy and water in your home and charges are directed correctly.

If you decide to leave your property without paying or arranging to pay any arrears you may have incurred while in a tenancy, we may decide it's necessary to share your details either with the utility company you were with or a debt collection agency operating on their behalf.

However, we will only share information where we believe it's in our legitimate interests to do so, and we will take into account the volume of information requested and how it might affect you to share it.

Where 'sharing' is in our 'legitimate business interests', we may also share your information without seeking your consent first with the following parties:

- Our external contractors to facilitate repairs, maintenance or improvement works
- Debt and money management advisors

- Solicitors' firms (eg. Devonshires) to obtain legal advice on issues relating to your tenancy
- Local Authority teams such as Counter Fraud, social services, environmental health and benefit agencies
- Utility companies (and their representatives) and Council Tax Departments to ensure billing details are correct
- Specialised support services for tenants and/or customers where we deliver services for individuals working in partnership with third parties across Greater Manchester. For example, Sheltered Schemes, supporting vulnerable adults.
- Third parties providing services on our behalf. For example, a mailing company distributing our newsletter; a research company carrying out a customer satisfaction survey; a recruitment agency managing a vacancy on our behalf; or a debt collection agency pursuing former tenant arrears
- Credit agencies such as Experian so we can trace you, if you owe a debt
- Independent auditors; for example, as part of a social impact audit our auditor may ask to see a sample of evidence
- Agencies committed to protecting public funds and/or preventing fraud in line with the National Fraud Initiative
- Police and other relevant authorities (e.g. Department of Work & Pensions, Universal Credit, Probation Service, HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty
- Health and care organisations such as the NHS, GPs, Manchester Council's Adult Social Care team, as necessary for exercising statutory functions.
- The Ministry of Housing, Communities & Local Government for research and statistical purposes.
- We may also share information when required by law for example where ordered by the Court or to protect an individual from immediate harm, abuse or neglect. For example, sharing information about tenants at risk of eviction with Manchester Council for the purposes of offering homelessness assistance.

There may be occasions where we need to process your information outside of the European Economic Area (EEA), for example if we were to use a third-party computer system supported by employees in the USA. If we were to do this we would take all necessary steps to ensure that your information remains secure.

### **How long will you keep my personal data for?**

We only hold records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including regulatory or financial reporting requirements. Normally, this will be for six years from the end of your contract (tenancy or leasehold agreement).

If we need to process your data for research or statistical purposes we will 'anonymise' your personal data (taking out any identifiers, like your name or contact details so that the information can no longer be associated with you). In these cases we may use this data indefinitely without providing further notice to you.

In the [personal data journey](#) we have set out how long we keep different types of information for (known as 'retention periods'). This is based on national guidance, legal requirements and best practice for housing providers.

We may retain your personal data for a longer than the standard retention periods in the event of a complaint, to settle a legal claim or if we reasonably believe there is a prospect of one being made.

Depending on the lawful basis we rely on, which we have shown against each of these retention periods, we may be able to delete your data if you ask us to. For further information on this right, please see the section below: [What are my information rights?](#)

### **How will you protect my personal data?**

We are committed to protecting your personal information by taking appropriate technical and organisational measures to prevent its loss, damage or unauthorised disclosure. For example, we have systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.

We have achieved the government's Cyber Essentials certification, which demonstrates our commitment to keeping your information secure. We regularly train all colleagues, managers and Board members on how to apply the data protection principles in their roles and spot the signs of a potential cyber-attack. Our network of Data Ambassadors act as 'first responders' for any data queries or concerns in their business area, working together to support teams and share best practice across the Group.

Our Information Security Incident policy sets out how we deal with any suspected breach of personal data. We will work quickly to contain, investigate, and learn from any incidents we become aware of, and will notify you and the [Information Commissioner's Office \(ICO\)](#) as soon as we have evidence that a breach has occurred, where we are legally required to do so.

When we need to share personal data with our contractors and third-party suppliers, our relationships are governed by our contracts which include strict data sharing and confidentiality protocols. We keep a record of all our business processes which use our personal data and share this with our auditors and regulators where required.

Before we do anything differently with your data, we also carry out reviews of processes which might result in an increased level of risk to your [information rights](#), and introduce measures to reduce these risks to an acceptable level. These reviews are called Data Protection Impact Assessments (DPIAs). All DPIAs are reviewed independently by our [Group Data Protection Officer \(DPO\)](#). Where necessary, we share the results of these assessments with the ICO.

To help us ensure confidentiality of your personal information we will ask you (and any of your representatives) security questions to confirm your identity when you call us and as may be necessary when we call you. We will not discuss your personal information with anyone other than you, unless you have given us prior written authorisation to do so or where we have received a clear verbal instruction from you (as a one-off circumstance).

## What are my information rights?

Under certain circumstances, you have rights under the data protection laws in relation to your personal data. You can:

- Request access to your personal data (also known as a 'Subject Access Request');
- Ask us to correct your personal data (also known as 'the right to rectification');
- Ask us to delete your personal data (also known as 'the right to be forgotten');
- Ask us to stop using your personal data for a period (also known as 'the right to restriction');
- Ask us to transfer your personal data; and
- Object to us using or holding your personal data;
- Obtain explanation about or challenge a decision based solely on '[automated processing](#)' of your personal data (where the decision has been made without human intervention and significantly affects you);
- Withdraw your consent to us using your data.

We have provided more information about each of these rights on our [Information Rights page](#). If you wish to exercise any of the rights set out above, please contact [informationgovernance@wchg.org.uk](mailto:informationgovernance@wchg.org.uk).

## Who do I contact if I'm unhappy with the way my personal data has been handled?

If you wish to raise a confidential complaint about the way we have handled your personal information, including to request an internal review of the outcome of a subject rights request, you can contact the Group Data Protection Officer (DPO) as follows:

Jovian Smalley, Information Governance Manager / Group Data Protection Officer  
Wythenshawe House  
8 Poundswick Lane  
Wythenshawe  
Manchester  
M22 9TA  
Tel: 0300 111 0000  
Email: [complaints&praise@wchg.org.uk](mailto:complaints&praise@wchg.org.uk)

We will acknowledge your complaint within 30 days, and will do everything we can to put things right as soon as possible.

If you are unhappy with the Group DPO's handling of your complaint, or for independent advice about data protection, you can contact the Information Commissioner's Office (ICO):

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113  
Website: <https://ico.org.uk/for-the-public/>