



Housing Management & Finance Department Service User Privacy Policy





Housing & Finance Department

Privacy Policy

The General Data Protection Regulation (GDPR) came into effect on the 25th of May 2018, replacing the Data Protection Act 1998. The GDPR aims primarily to give control to citizens and residents over their personal data and make data protection law fit for our digital age where we share so much information about ourselves via our phones and computers.

Triangle is a Registered Social Landlord and is registered with the Information Commissioner's Office as a Data Controller under the General Data Protection Regulations 2018.

Triangle will ensure that handling of all personal data is carried out in accordance with the fundamental data protection principles outlined in the GDPR.

For existing service users it is worth noting that there are no changes to the information we collect and store owing to the advent of the GDPR.

Within the organisation, we have identified a Data Protection Officer. They are qualified and competent to make sure the organisation respects your rights and follows the law.

At Triangle Housing Association Limited we are committed to protecting and respecting your privacy.

This Policy explains when and why Triangle collect personal information about persons who use our Services, how Triangle use it, the conditions under which Triangle may disclose it to others and how the organisation keeps it secure.

Triangle Housing Association (THA) will be the 'data controllers' of the personal information that you provide to us about you as a service user and about the people you live with. If you are a tenant, this information is required to maintain and support your tenancy.

Triangle may change this Policy from time to time to ensure it is up to date and compliant with legislation. By agreeing to become a tenant, using our services or accessing Triangle's website and tenant portal (known as SDM® My Home, you are agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent to the Data Protection Officer, Triangle Housing Association, 60 Eastermeade Gardens, Ballymoney BT53 6BD Alternatively, you can email info@trianglehousing.org.uk or telephone 028 2766 6880.

The next section of this document provides general information for anyone coming into contact with Triangle. If you are a tenant, there is a special section at the end you may wish to read with due care and attention.

Triangle' Status and What We Do

Triangle Housing Association is a Housing Association, registered with the Department for Communities (DFC). Triangle is also a registered charity, which provides General Needs Social Housing, Supported Living Services and Accommodation, Floating Support and Supported Employment services.

How does Triangle collect information from you?

Triangle obtains information about you when you engage with our services, become an employee or a volunteer. Furthermore, when entering into a commercial contract, joint management agreement or service level agreement with Triangle Housing Association, relevant data and information will be collected and stored. Triangle will collect information in order to ensure contract obligations of both parties are met.

What type of information is collected from you?

The typical personal information Triangle collect might include your name, address, email address, sensitive information regarding your mental or physical well-being, third parties including family members or medical practitioners, bank details for sole traders / contractors and key personnel within those contracts. This is not an exhaustive or comprehensive list and what personal information Triangle collect is dependent upon the service you are engaging with and the nature of your relationship with the organisation, as well as your status.

If you wish to enquire about the information Triangle hold relating to you, please contact us. Here are the contact details: The Data Protection Officer, Triangle Housing Association, 60 Eastermeade Gardens, Ballymoney, BT53 6BD. Alternatively, you can email info@trianglehousing.org.uk or telephone 028 2766 6880.

Tenants, Licensees and those holding use and occupation of a Triangle property can also contact their housing officer regarding any data protection enquiry.

How is your information used?

Information is used for a wide range of purpose depending upon the nature of the relationship you have with Triangle. For example, Triangle may use your information to:

- Enable Triangle Housing Association to provide a service to you (including care & support)
- Seek your views or comments on the services Triangle provide
- Notify you of changes to our services
- Process a job application
- To manage your employment contract and the payroll system, also pensions
- Process orders that you have submitted

- To carry out our obligations arising from any contracts entered into by you and us

Triangle review their retention periods for personal information on a regular basis. Triangle are legally required to hold some types of information to fulfil our statutory obligations. Triangle will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Who has access to your information?

Only those who need this information in order to provide a service to you or to fulfil the performance of a contract with you. It is notable that:

- Triangle will not sell or rent your information to third parties.
- Triangle will not share your information with third parties for marketing purposes.
- Triangle will only share information with third parties as a requirement of the service or if Triangle are legally bound to do so.

Third Party Service Providers working on our behalf: Triangle may pass your information to our third party service providers, suppliers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to ICT providers). When Triangle use third party service providers, Triangle disclose only the personal information that is necessary to deliver the service and Triangle have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that Triangle will not release your information to third parties beyond Triangle Housing Association, unless you have requested us to do so, or Triangle are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Third Party Providers/Partners Triangle work in association with: Triangle work closely with various third party providers such as the Department for Communities, the Housing Executive, health professionals, social services, Health Trusts, HMRC, BACs to ensure you have a range of quality and reliable services designed to meet your needs. The relevant third party provider will use your details to provide Triangle Housing Association with information and carry out both our and their obligations to you when using the services. In some cases, they will be acting as a data controller of your information and therefore Triangle advise you to read their Privacy Policy. These third party providers/partners will share your information with us which Triangle will use in accordance with this Privacy Policy.

Triangle may transfer your personal information to a third party as part of any business restructuring or reorganisation, or if Triangle are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of individuals. Triangle will take steps with the aim of ensuring that your privacy rights continue to be protected.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or if any of the other information Triangle hold is inaccurate or out of date, please notify responsible staff who will update this.

You have the right to ask for a copy of the information Triangle Housing Association hold about you. This is known as a Subject Access Request and Triangle have a calendar month to comply with such a request.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, Triangle take steps to ensure that it's treated securely. Any sensitive information is securely filed and Triangle apply software to our ICT systems, website and tenant portal (SDM ® My Home) to prevent unauthorised access to your information.

16 or Under

Triangle are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Transferring your information outside of Europe

Triangle does not currently transfer any personal data outside of Europe.

Additional Information for Tenants, Licensees and those holding the right to Use and Occupation of Triangle Properties

If you are a tenant, Licensee of the Association, or hold the right to Use and Occupation of a Triangle Property Triangle typically collect and store information including, but not limited to:

- Your full name (and proof of your identity/photo ID such as a passport or driving licence)
- Your national insurance number
- Your date of birth
- Your contact details (landline phone number, mobile phone number email or correspondence address)
- Employment details
- Details of anyone authorised to act on your behalf such as an appointee
- Details (including the name and date of birth) of all household residents including any children
- Your banking details should you pay your rent by Direct Debit etc.
- Personal information that will vary on a case by case basis to help Triangle resolve alleged breach of tenancy conditions, alleged anti-social behaviour or fraud, rent arrears
- Next of kin details

- Equality information, data regarding disabilities or vulnerabilities. Triangle use this information to specifically tailor our service to better meet your particular needs and circumstances
- Information required for safeguarding of staff and other tenants
- Information needed for ensuring the wellbeing and health and safety of others
- Financial information. Triangle may use this as part of a pre-tenancy service to help customers make a decision around affordability and resolve any housing debt/arrears and provide welfare benefits. Triangle may use this to apply for funding on a customer's behalf (for example the Vicars Relief Fund)
- Your corporate and anti-social behaviour complaints history
- Your house sales application (as applicable)
- Your transfer application
- Your succession application
- Your assignment application
- Details relating to goodwill payments or redecoration allowances
- Recommendations by an occupational therapist and health information - when Triangle require this to make decisions on the property type customers may require and support funding for disabled adaptations made to the property a customer is living in

Other information Triangle may collect from you includes:

- Disabilities or vulnerabilities. Triangle use this information to specify and tailor our service to better meet your particular circumstances and needs. Triangle may use this information for safeguarding of staff and other service users
- Financial information. Triangle may use this to help resolve arrears issue and optionally signpost you to third parties who might assist you
- Information relating to funding agreements, care and support charges, benefits, payments and financial control systems

Triangle collect your personal 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, email or meet with us or respond to a survey.

Triangle may collect information when you use our social media sites, Triangle's website(s) or self-service portal 'SDM ® My Home when you activate your account.

Triangle may also record calls to our landline phones calls. Calls may be recorded for training and monitoring purposes and our recordings are usually held for a period of six months.

Triangle operates a Closed Circuit Television (CCTV) system at our office premises and at various locations within the vicinity of our properties for the detection and prevention of crime, to fulfil our legal obligations to keep our staff safe and in pursuit of our legitimate basis to keep our properties safe and secure. Triangle's CCTV cameras and cameras typically operate continuously and recordings are typically held for one month.

From time to time Triangle may operate CCTV and / or sound recording and/or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime.

Triangle may also take photographs and video footage at events Triangle organise or take part in, 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.

Triangle may receive information about you from third parties including but not restricted to:

- The Office of Care and Protection
- The Housing Executive (NIHE) including Supporting People
- The Department for Communities
- The Police Service for Northern Ireland
- The Fire Service for Northern Ireland
- Other public, governmental and statutory bodies
- Benefits office relating to your housing
- Prior landlords, agencies when you apply for housing
- Your GP, OT, health workers, social worker and / or welfare or support organisations who you might be involved with
- Lawyers, councillors, MLAs, MPs, Councillors or other representatives acting on your behalf/instruction
- Appointees and those with power of attorney

Review of this Policy

Triangle keep this Policy under regular review. This Policy was last updated in November 2018.

