
What is the purpose of a Privacy Notice?

In order to deliver our services, Elim needs to gather personal data from its residents, service users, and those applying for housing. This makes us a *Data Controller*.

Elim respects your privacy and are committed to protecting your personal data. This Privacy Notice gives you information about the personal data, including sensitive personal data, we collect, why we collect it and how we look after it. It will give you information about your rights and explain what you can do if you have any questions or concerns.

Although this notice is geared towards residents of Elim homes, the notice is also applicable to any other individual who provides personal data to Elim, e.g. a member of staff or a job applicant.

Who we are

Elim is a provider of social, supported and other types of housing, registered with Homes England. Our normal activities are:

- Providing social and other types of housing
- Delivering housing related support services
- Property and grounds maintenance and repair
- Managing tenancy, license or leases as a landlord
- Developing new housing

Elim has a profit-making subsidiary, Lime Property Ventures.

Our Head Office address is Elim Housing, Units 3 & 4 Pinkers Court, Briarlands Office Park, Gloucester Road, Rudgeway, BS35 3QH, our telephone number is 01454 411172 and our email address is info@elimhousing.co.uk.

We are a Data Controller, registered with the Information Commissioners Office. Our registration number is Z7302750.

What is personal data?

Personal data is data relating to any individual that can be used to identify that individual, for example:

- Names
- Address
- Dates of birth
- Contact Details, (ink Email and Telephone Numbers)
- National Insurance number
- Copies of any relevant identification documents
- Employment details
- Current living conditions
- Details about your home, your housing needs and the written statement of your occupation contract
- Rent & service charge information, including details of any arrears

- Financial Information, including:
 - Credit checks
 - Details of outgoings & any debts
 - Income details
 - Bank details
- Photographs taken of you or your property, such as CCTV footage or photos taken for repair assessments
- Audio recordings of calls made to & from our Head Office and other correspondence you have with Elim Housing Association
- References received about you (for example from your employer or previous landlord) We will also at your request, provide references to a new landlord on your behalf

This list is not exhaustive, and we may request other information from you. This will however only be to enable us to deliver services to you or provide additional support.

What is special category data?

Special category data is particularly sensitive personal data that are subject to additional protections in how they can be gathered and used. Special category data includes information relating to a person:

- Racial or ethnic origin
- Political opinions
- Religious beliefs or other beliefs of a similar nature
- Whether you are a member of a trade union
- Physical or mental health or condition
- Sexual orientation
- Commission or alleged commission of any offence
- Any proceedings for any offence you have committed or are alleged to have committed, the disposal of such proceedings or the sentence of any court in such proceedings

By analysing the special categories of data we collect, we can ensure that the services we provide are fair and promote equality of opportunity for all. This means that we are better able to plan and deliver services to all of our customers.

Details of physical or mental health conditions are needed to ensure we provide accommodation or services that are suitable for need and that we provide you with adequate support should you wish to receive it. Elim seeks to minimise the amount of Special Category personal information we hold about an individual. We make sure this information is secure at all times and we inform individuals of why we need it and how we will be using it.

Why do Elim collect personal data?

Elim collects personal data to carry out the normal activities detailed above. When we collect personal data, we do so under specific legal bases. The table below details our most common legal bases for processing personal data and gives examples of how we might use them in carrying out our activities.

The table is not exhaustive. For more detail about the legal bases for processing personal data you can go to the website of the Information Commissioner's Office at www.ico.org.uk or enter 'ICO legal basis for processing' into Google or another search engine. The website also includes information about the bases for the processing of sensitive personal data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably believe that we are using it for another legal basis.

What we collect	Why we collect it	Our reason for collecting it
Personal information about you and the other people who will be living with you: (name, contact details addresses, previous addresses, email address, phone number, date of birth, future addresses, employment status, Photo ID, immigration status, unpaid debts owed to EHA, signature/electronic signature).	• To process your application • To manage your Occupation Contract with us, including providing you with support • To assess eligibility for an Occupation Contract • To provide you with services e.g., repairs • To contact you about our services e.g., our newsletter • To contact you about service updates e.g., rent payment changes • To fulfil our legal obligations e.g. fraud detection, track debtors who have absconded with unpaid debts to EHA	• Performance of contract • Legal obligation • Legitimate interest (the efficient running of our organisation) • Exercise legal right to recover monies owed
Photographic ID	• To process your application • Prevent fraud	• Legal obligation –the (Identify contract holder in line with Anti Money Laundering and Terrorism regulations 2017, and to prevent tenancy fraud)
Medical information (including doctors and social workers opinions)	• To process your application • To manage your Occupation Contract with us • To provide you with services which meet your needs e.g., large print • To contact you about our services which may be of interest to you	• Performance of contract • Legal obligation • Legitimate interest (the efficient running of our organisation) • Vital interests (making reasonable adjustments under disability legislation/regulations) and 9.2(g) ensure there is no discrimination on the basis of disability (under the DPA18 and Equalities Act)
Financial information (including benefit information, household expenditure, bank statements, credit history, debt including rent arrears, payslips)	• To process your application • To assess eligibility and affordability for an Occupation Contract with us, including	• Performance of contract • Legal obligation • Legitimate interest (the efficient running of our organisation)

	providing you with support • To manage your Occupation Contract with us • To provide you with financial support/advice in respect of benefits eligibility	
Equalities information	• To process your application • To manage your Occupation Contract with us • To provide you with services which meet your needs. • To analyse the needs of the people who are applying/living in our properties	• Performance of contract • Legal obligation • Legitimate interest (develop and improve our properties) • Ensure there is no discrimination on the basis of disability (under the DPA18 and Equalities Act)
Criminal information (including offences, spent and unspent convictions and details of incidents at our or other properties)	• To process your application • To manage and assess your eligibility for an Occupation Contract with us • To ensure public safety and the safety of our staff and contractors	• Performance of contract • Legitimate interest (public protection) • Safeguarding of children and individuals at risk • Performance of contract
General complaints or reports of anti-social behaviour	• To process your application • To assess eligibility for an Occupation Contract • To manage your Occupation Contract with us • To ensure public safety	• Performance of contract • Performance of contract • Legal obligation • Legitimate interest (public protection)
Involvement with support agencies	• To process your application • To manage your Occupation Contract with us, including providing you with support • To provide you with services which meet your needs	• Performance of contract • Performance of contract • Legitimate interest (the efficient running of our organisation)

Employment information	• To process your application • To manage your Occupation Contract with us • To assess your eligibility for an Occupation Contract with us	• Performance of contract • Performance of contract • Legitimate interest (the efficient running of our organisation)
Record of contact with us (telephone calls, letters, emails, details of visits)	• To process your application • To manage your Occupation Contract with us, including providing you with support • To provide you with services/advice which meet your needs	• Performance of contract • Legal obligation • Legitimate interest (the efficient running of our organisation)
Photographs	• To promote our events • To promote the work of the organisation	• Legal obligation • Legitimate interest (promote our organisation)

The lawful basis for most of our personal data processing of your information is where it is necessary for the purposes of Hightown's legitimate interests. Where Elim Housing Association relies on legitimate interests as a reason for processing data it has considered whether or not those interests are overridden by the rights and freedoms of service users and has concluded that they are not.

The lawful basis may in some instances be because we have your consent to process your personal information. Where this applies this will be made clear to you and you can withdraw your consent at any time.

We may also process your information for other reasons, such as where we are under a legal or contractual obligation to process or disclose the information; or where we need to protect your vital interests or those of another person.

Some personal information is treated as more sensitive (for example medical or diversity information). The legal basis for processing these special categories of personal information is more limited. To lawfully process special categories of personal data, we must identify a specific lawful basis for the processing, which may be because we have your consent; we need to protect the vital interests (health and safety) of you or another person; you have already made your personal information public; we or another person needs to bring or defend legal claims; there are substantial public interest grounds.

How do Elim collect personal data?

We collect personal data in a variety of ways:

- Directly from the data subject, e.g. if you give us financial information as part of an affordability test, if you provide personal information for completion of a support plan, or when an applicant for a job with us submits their application.
- From a third party, e.g. when you apply for one of our properties through a local authority's Choice Based Lettings or Home Choice scheme.

- Digital technologies or interactions, e.g. your activity on our website may be monitored. Our website will provide you information about the gathering of cookies and similar technologies when you arrive there.
- Through CCTV footage

Who do Elim share my personal data with?

In the course of carrying out our activities, we may need to share your data with third parties. This will always be done under a legal basis for processing. Most commonly, the legal basis used is that we need to share your information in order to deliver to you a service as part of our contract with you, e.g. providing your name and address to a contractor who carries out repairs for us. We always take steps to ensure:

- That we only provide personal data necessary for the activity to be carried out.
- That the third party only uses the data provided for the purpose for which it was intended.
- That the third parties we provide your information to respect the security of your personal data and are compliant with data protection regulations.

Third parties that we might expect to share information with include:

- Local authorities
- Benefit agencies
- Sub-contractors who we pay to deliver part of our service, e.g. companies providing a maintenance service
- Support agencies involved in providing a support plan
- Your potential future housing providers

What about my children?

We will ask for basic information about children in households; however we would not process this information as part of our normal activities. Knowing the number and age of children in a household helps us to monitor occupancy of a property and can improve any advice we might offer.

What are my rights?

Under data protection laws, you have rights in relation to the data you choose to provide and how you want us to process it. The rights include (but are not restricted to):

The right to not provide your personal data

You do not have to provide your personal data if you would rather not. In some cases, however, not providing personal data may mean we are unable to provide a service, e.g. we cannot provide you with a tenancy agreement without your name. In other cases, failure to provide personal data may mean that we are not able to provide a service to the standard we would choose to, e.g. information about a person's health or disability helps us to make sure that specific needs are taken into account when arranging visits or repairs.

If you are unsure why we might need specific personal data, then please ask the member of staff you are dealing with, and they will be able to explain.

The right to request access to your personal data that Elim hold

This is known as a 'data subject access request.' You can make a subject access request by contacting the relevant member of staff. We will sometimes ask you to confirm the request in writing, though this will not always be necessary. We will provide you the information in writing within one calendar month of the request being received, though in most cases we would hope that we can do it much more quickly.

The right to be informed about how we use your personal data

You have the right to know about how we are using your personal data and the grounds for that usage. We will provide this information through the same process as a data subject access request.

The right to request correction to your personal data that Elim hold

It is helpful for everybody if the data that we hold is accurate. You can have any incomplete or incorrect personal data that we hold corrected by speaking to a member of staff, though we may need to verify the accuracy of the new data that you provide to us.

The right to request erasure of your personal data

You can ask us to delete your personal data if you feel that there is not good reason for us to continue to hold it. You may be asked to put your request in writing. On certain occasions we may not be able to act on your request for legal reasons, but we will always explain these reasons clearly to you.

The right to withdraw consent

Where we are processing your data on the basis of consent, you can withdraw this consent at any time, though doing so could affect the service we are providing to you.

How long will Elim keep my data for?

In the majority of circumstances, we will erase or destroy personal data once it has fulfilled the purpose for which it is gathered, e.g. information gathered when determining who to allocate a property to will be erased/destroyed once the property has been allocated.

Certain personal data may need to be kept for longer for legal or other reasons, e.g. we keep tenancy agreements permanently, even after the tenancy has ended. For more detailed information on how long we retain personal data for, see our Retention Policy. This is based on National Housing Federation guidance, legal requirements and best practice.

Where can I go for more information?

At all times, Elim will have a named Data Protection Officer. At present, the postholder is Jane Okonkwo, Head of HR. Jane can be contacted at Head Office, by phone on 01454 411172 or by email at info@elimhousing.co.uk.

Other related documents that provide more information about Elim's data protection are either available on our website or by request to the email address above.

The Information Commissioner's Office has a website with extensive information - www.ico.org.uk – and can be contacted on 0303 1231113.

If you wish to make a complaint, then you can use Elim's complaints procedure or, if you think that we are in breach of any data protection regulations, you can complain directly to the ICO.