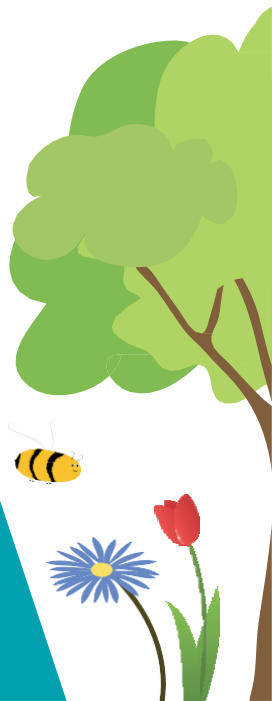
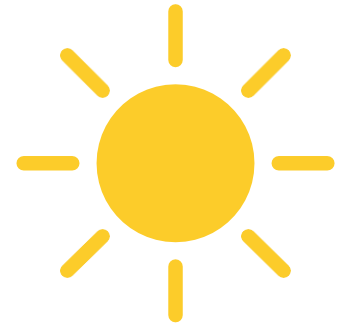


Plus Dane Housing

Data Protection Policy

February 2024
GOV-POL-08-03



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1 Policy Statement

The purpose of the Data Protection Policy (Policy) is to provide direction and support and set out Plus Danes approach to Data Protection. Plus Dane is committed to compliance with all relevant Data Protection legislation and the requirements of the UK General Data Protection Regulation (UK GDPR) when processing personal data. Plus Dane will delegate appropriate powers and responsibilities to colleagues to ensure that it is able to comply with the Data Protection Act and associated regulations.

This policy sets out Plus Dane's approach to complying with its legal responsibilities under the Data Protection Act and how it enables individual rights to be upheld and exercised.

This policy applies to anyone who is engaged to process personal data for or on behalf of Plus Dane including: colleagues, volunteers, casual and temporary staff, directors and officers, and third parties such as sub-contractors and suppliers, and anyone with or to whom Plus Dane shares or discloses personal data.

The Policy is a key part of Plus Danes Data Protection compliance and should be considered alongside other supplemental policies, processes, guidance and other relevant resources.

2 Policy Aims

This policy aims to:

- Explain Plus Dane's obligations as both a Data Controller and Data Processor including the commitment to the six principles¹ of data processing.
- Detail our approach to implementing and maintaining alignment with the six principles of data processing is processed lawfully, fairly and in a transparent manner.
- Confirm our commitment and approach to supporting the rights of data subjects.
- Detail Data Protection Roles and Responsibilities, including the role of the Data Protection Officer.
- Establish requirements for training and evaluation of data protection measures.

3 Links to Corporate Plan:

The Policy supports delivery of all objectives within the corporate plan.

4 Definitions

The following definitions apply to this policy:

¹ The six principles of data protection are found at Article 5 of UK GDPR they are: 1. Lawfulness, fairness and transparency; 2. Purpose limitation; 3. Data Minimisation; 4. Accuracy; 5. Storage Limitation; and 6. Integrity and confidentiality.

- **Data Controller:** the natural (e.g. an individual) or legal (e.g. limited company) person, public authority, agency or other body which alone or jointly with others determines the purposes and means of processing of personal data. Plus Dane Housing is registered with the Information Commissioner's Office (ICO) as a data controller.
- **Data Processor:** means a natural or legal person, public authority, agency or other body that processes personal data on behalf of and under the instructions of the controller.
- **Data subject:** A living individual whose data is collected, held, and/or processed by a data controller for varying purposes and who can be identified, directly or indirectly, by reference to such personal data.
- **Data process owner:** Any senior manager who is responsible for data processing activities within their service area.
- **Personal data:** Any information relating to an identified or identifiable natural person, including a name, an identification number, location data, an online identifier to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Special Category Personal Data:** this is personal data which requires more protection because its sensitive and can include racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, religious or philosophical beliefs, or trade union membership, and data concerning health or data concerning a natural person's sex life or sexual orientation.
- **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Personal Data Breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.
- **Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
- **Profiling** is any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict that person's performance at work, economic situation, location, health, personal preferences,

reliability, or behaviour. This definition is linked to the right of the data subject to object to profiling and a right to be informed about the existence of profiling, of measures based on profiling and the envisaged effects of profiling on the individual.

- Consent means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the person, by way of a statement or by a clear affirmative action, signifies agreement to the processing of personal data.
- UK GDPR means the General Data Protection Regulation (EU) 2016/679 as retained in UK law by virtue of the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

5 Special Category Personal Data

Plus Dane recognises that certain categories of Personal Data require a higher level of protection, this is known as Special Category Personal Data. Whenever Plus Dane seeks to utilise Special Category Personal Data it will have justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with explicit written consent.
- Where it is needed to carry out legal obligations and in line with this policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with this data protection policy.
- Where it is needed in relation to a legal claim or where it is needed to protect the data subject's interests (or a third party's interests) and there is no capacity to give consent, or where the information has already been made public.

The Data Protection Office at Plus Dane can assist with identifying the most appropriate basis whenever such processing is required.

6 Plus Dane Housing as a Data Controller and Data Processor

Plus Dane is a Data Controller and Data Processor in different scenarios. It is important to understand the difference between the different designations to ensure that we operate in compliance with our contractual and legal obligations.

When acting as Data Controller, Plus Dane will be responsible for determining what Personal Data will be processed, by whom, for what purpose, and for how long. For example, when a customer moves into a Plus Dane property, and we collect their Personal Data to facilitate that process.

When acting as a Data Processor, Plus Dane will need to consider the directions provided to it by the Data Controller, and it will be Plus Danes responsibility to comply with those directions.

No personal data will be used for any purpose other than that which it was collected and / or created for, in accordance with this policy.

One of the following lawful bases must apply for Personal Data to be processed:

- Consent of the Data Subject
- Required to fulfil a contract with the Data Subject
- Compliance with a legal obligation
- To safeguard the vital interests of the Data Subject
- Public interest
- For the purpose of legitimate interests pursued by the Data Controller, except where such interests are outweighed by the rights and freedoms of the Data Subject

Plus Dane has captured the lawful basis for processing each type and category of data that it holds within the Data Register; the Data Protection Office has responsibility for maintaining the data register.

6.1 Data Processor

Plus Dane will also act as a Data Processor on behalf of partner organisations under an agreed contract. In these circumstances, the Data Controller will direct Plus Dane as the type of data to be processed to fulfil the contract and be specific about data storage and disposal.

6.2 Joint Controller

In certain circumstances, such as when Plus Dane is acting jointly with another third-party, there may be a requirement for Plus Dane to assume the role of Joint Controller with another partner organisation. This will be done under contract with indemnities established where relevant to ensure that roles and responsibilities are clear, and indemnities are established to mitigate any presenting risk.

The Data Protection Office can assist with advice, support, and guidance on this area upon request.

7 Protecting and Supporting Data Subject Rights

The rights of Data Subjects are at the heart of Plus Danes data protection programme, information about these rights and how Plus Dane deal with the same can be found below.

7.1 Right to be Informed

The right to be informed requires an organisation be transparent about how it will use personal data. A Data Subject must be given information about how his/her data will be processed, when the data is initially collected, and any time previously collected data will be used in for any new data processing activities. This information is presented as a Privacy Notice, which is published on the Plus Dane website. It is reviewed regularly and written in clear and plain language.

7.2 Right to Access

Data Subjects have the right to access the personal data that Plus Dane processes about them. Access enables an individual to be aware of and verify the lawfulness of the processing of their data. Individuals have the right to obtain:

- Confirmation that their data is being processed;
- Access to their data; and
- Other supplementary information – this largely corresponds to the information that should be provided in a privacy notice (how and why the data is being used).

Plus Dane has established a clear process for the management of Subject Access Requests that complies with UK GDPR and will ensure that Data Subjects are able to access their data where it is determined that a legitimate request has been raised.

7.3 Right to Rectification

Data Subjects have the right to have their personal data rectified, should it be incorrect or incomplete. This right extends to data which is being processed by third parties.

7.4 Right to Erasure “The Right to be Forgotten”

The right to erasure is the right of a data subject to have their personal data deleted or destroyed, where there is no compelling justification for its continued processing.

7.5 Right to Restrict Processing

Data subjects have the right to block processing of their data. Once restricted, the data can only be used in a manner that complies with the restriction.

This action could be taken when a data subject is concerned about incorrect or incomplete data being used to make a judgement which impacts them (e.g., an application for a service or offer). The processing of that data could be restricted until the “rectification” claim has been fully processed.

7.6 Right to Portability

The right to data portability allows individuals to obtain and reuse their data for their own purposes across different services. It allows them to move, copy, or transfer their data easily from one IT environment to another, in a safe and secure way, without hindrance to usability. It enables consumers to take advantage of applications and services, which can use this data to find them a better deal or help them understand their spending habits.

The right to data portability only applies:

- To personal data an individual has provided to Plus Dane.
- Where the processing is based on the individual's consent, or for the performance of a contract; and
- When processing is carried out by automated (i.e. digital) means.

The Data Protection Office should be consulted whenever a new automated processing activity is considered, or if a request is received.

7.7 Right to Object

Data subjects have the right to object to processing of their personal data in the following circumstances:

- Processing based on legitimate interests (business need) or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Processing for purposes of scientific/historical research and statistics.

A data subject, colleague or customer, could object to the processing of their data at the point of first collection, by denying consent, or during the course of that data being processed. However, if processing is justified, or necessary for the fulfilment of a contract, that data subject could be left without service or incapable of fulfilling a contract. Such a situation could result in the inability of Plus Dane to engage in, or maintain, a contractual agreement with that data subject.

The right to object is a qualified right, in that it is not applicable in all circumstances, the Data Protection Office are able to offer advice, guidance, and support with dealing with such a request.

8 Rights related to Automated Decision Making (including Profiling)

Automated decision-making is making a decision, which impacts an individual, solely by automated means (no review by a person).

Profiling is a form of automated decision-making in which personal data is analysed to evaluate certain characteristics about a person (e.g. racial profiling, age profiling, or profiling based on socio-economic status).

A data subject may object to their personal data being processed in such a manner and may also challenge any decision or outcome based on the same, by seeking a human review.

The use of Artificial Intelligence (AI) and automated analysis tools will be carefully assessed prior to being utilised to ensure that they can be used effectively whilst also acting in compliance with the UK GDPR and Plus Danes data protection policies.

9. Data minimisation

Plus Dane will strive to use a minimum of personal data in its data processing activities and will periodically review the relevance of the information that is collected. Data process owners are responsible for ensuring that no unnecessary, irrelevant or unjustifiable personal data is collected or created either directly or indirectly through the data processing activities they are responsible for and / or engage in. The Data Protection Officer (DPO) will provide advice regarding the justification of personal data collected or created, where required.

9.1 Data accuracy

Plus Dane recognises that the accuracy of data is important, and that some data is more important to keep up to date than others. Plus Dane will use reasonable endeavours to maintain data as accurate and up to date as possible, in particular data which would have a detrimental impact on data subjects if it were inaccurate or out-of-date.

Data process owners are responsible for ensuring that personal data they have collected or created either directly or indirectly through the data processing activities they are responsible for and / or engage in is maintained, accurate and up-to-date and that personal data, the accuracy of which cannot reasonably be assumed to be accurate and up to date, is treated appropriately through erasure or anonymisation

9.2 Data retention

Plus Dane will ensure that it does not retain personal data for any longer than is necessary for the purposes for which it was collected and will apply appropriate measures at the end of data's useful life such as erasure or anonymisation.

Plus Dane has adopted the guidelines set by the National Housing Federation for data retention. Data owners will be responsible for determining the retention period for specific personal data under their control. Data retention is an important issue as both the over-retention and under-retention of personal data could have a detrimental impact on both the data subject and the organisation.

Plus Dane will record data retention periods within its internal Personal Data register and will take such steps to ensure that retentions periods are adhered to.

9.3 Information security

Plus Dane has a Cyber Security Policy which ensures that data, systems and hardware is secure and protected against compromise, loss, unauthorised disclosure and other misuse. The Digital Data Security Policy sets out the methods for storing digital data.

A clear desk principle is in operation across Plus Dane offices to support the security of physical documents. All colleagues, whether they are working in an office or agilely e.g. working at home, or in shared spaces are expected to keep documents that contain personal and sensitive information secure.

Paper documents should be discarded in confidential waste bins or shredded where people are working away from the office.

9.4 Consent

Plus Dane has interpreted consent to be as defined in the UK GDPR and that any consent shall not be valid unless:

- there is a genuine choice.
- it has been explicitly and freely given, and represents a specific, informed and unambiguous indication of the data subject's wishes that signifies agreement to the processing of personal data relating to them.

- the consent was given through statement made by the data subject or by a clear affirmative action undertaken by them.
- Plus Dane can demonstrate that the data subject has been fully informed about the data processing to which they have consented and is able to prove that it has obtained valid consent lawfully.
- a mechanism is provided to data subjects to enable them to withdraw consent and which makes the withdrawal of consent in effect as easy as it was to give and that the data subject has been informed about how to exercise their right to withdraw consent

9.5 Record keeping and accountability

To fulfil our responsibility to be able to demonstrate compliance with UK GDPR and other legislation, Plus Dane will maintain a Personal Data Register of the processing activities that it controls, undertakes or otherwise commissions as required by the Article 30 UK GDPR.

10 Data Sharing with Third Parties

A third party is a person or organisation that does not fall under the responsibility of Plus Dane. Examples of third parties include, but are not limited to, external suppliers, consultants, solicitors, contractors, partner organisations, and governing bodies.

Any contract that Plus Dane enters that requires the sharing of personal data will be accompanied by, or include within, either a Data Sharing Agreement (DSA) utilised where Plus Dane is Data Controller, or Data Processing Agreement (DPA) utilised where Plus Dane is Data Processor. Where Plus Dane is in the role of Data Controller this will be instigated by Plus Dane with Data Processors requested to sign and return the agreement before any personal data is shared. The Contract Owner will be responsible for establishing the DSA, supported by the Procurement Team.

Whilst there is greater focus on the Data Controller, in terms of accountability for compliance with the UK GDPR, the Data Processor can also be held accountable under the terms of its agreement with the Data Controller and under the law.

DPAs and DSAs will specify the subject matter, duration of processing, the nature and purpose of processing, the type of personal data to be processed, the category of data subject involved, and the obligations and rights of the Controller.

Any activity requiring data processing in a country that is not a part of the European Economic Area (EEA) or deemed adequate by the Information Commissioner's Office (ICO) will be elevated to the DPO for consultation and approval, as there are additional requirements to ensure that the protection afforded to the Personal Data is not diminished.

DSAs and DPAs will be recorded on the Data Sharing Register.

Any personal data processed by Plus Dane will be managed in line with the data retention schedule and destroyed when the necessary time has elapsed or there is no longer a need to process the information.

The Cyber Security policy sets out the minimum standard for secure data transfer.

11 Data Protection Impact Assessment (DPIA)

A Data Protection Impact Assessment (DPIA) is a process which identifies and mitigates risk to personal data. A DPIA must be conducted when a processing activity changes significantly, including technological changes, and when new or current processing activities are likely to place the rights and freedoms of data subjects at high risk. The following are examples of high-risk processing activities (this list is not exhaustive):

- Systematic and extensive processing activities, including profiling and where decisions that have legal effects, or similarly significant effects, on individuals.
- Large scale processing of special categories of data or personal data in relation to criminal convictions or offences. This includes processing a considerable amount of personal data at regional, national, or supranational level; that affects a large number of individuals; and involves a high risk to rights and freedoms (e.g., based on the sensitivity of the processing activity).
- Large scale, systematic monitoring of public areas (CCTV).

As all major changes to systems and processes will go through some form of formal decision making as part of the Plus Dane governance framework, project and process leads are required to make a mandatory consideration as to whether the processing of personal data is in scope as part of the change. Where this is confirmed, a formal DPIA will be completed and signed off by the DPO prior to submission for decision.

Plus Dane is committed to fostering a culture of privacy by design, as such the need for a DPIA (alongside privacy requirements in general) will be considered at the outset of a new project, or initiative and regularly reviewed.

12 Digitisation of Personal data

Service areas will maintain personal data solely in digital format, unless doing so is overly onerous or complex. If personal data exists in electronic format, Plus Dane staff will not hold duplicate paper copies of that data, unless there is reason for this. Access to electronic data will be technically limited (e.g., password protected, encrypted, physically separated), and if doing so is impossible, the issue will be escalated to the DPO.

The service area that owns a particular set of data will coordinate with the IT team to ensure that electronic data files are backed up and technologically secure.

Information is not permitted to be held on personal digital accounts and hardware. For further details refer to the Digital Data Storage Policy.

13 Responding to Incidents

13.1 Data Breach

A data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of Personal Data. In short, there will be a data breach whenever any personal data is lost, destroyed unlawfully, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

Common examples of data breaches include:

- Access by an unauthorised third party.
- Deliberate or accidental action (or inaction) by a controller or processor.
- Sending personal data to an incorrect recipient.
- Computing devices containing personal data being lost or stolen.
- Alteration of personal data without permission.
- Loss of availability of personal data that is not due for removal or destruction.

Upon notification of a suspected, or confirmed, data breach, Plus Dane has 72 hours in which to confirm the breach and determine whether the severity is such that the Information Commissioners Office is made aware.

The Data Protection Office will make a data breach determination and risk assessment within 24 hours of the breach being reported to them. The Data Breach Procedure should always be adhered with.

The Data Subject impacted by a breach may also need to be notified if it is deemed that there is a sufficiently high risk that they may be at risk.

Teams should always raise suspected data breaches, as failure to do so could increase the probability of data subjects being negatively impacted by them, and to a greater magnitude, failure to act promptly could also lead to criticism of Plus Dane by its regulators, as well as exposure to legal proceedings. The DPO maintains a register of suspected and actual data breaches.

14 Roles and Responsibilities

Role	Responsibility
Director of Governance and Assurance	Responsible for the implementation of this policy
All Directors and supervisory colleagues	Each member of the Leadership Team must ensure that colleagues in their respective areas of responsibility are aware of this policy, other relevant policies and procedures,

Role	Responsibility
	and their responsibilities concerning the processing of personal data. Managers and supervisory colleagues are responsible for ensuring that all data processing operations under their control or sphere of responsibility or commissioned by them are undertaken in compliance with this policy and other relevant data protection policies. All colleagues must be sufficiently aware of this policy and how it applies to their job role and sufficiently trained to carry out their duties in compliance with this policy
Director of Digital and Innovation	Responsible for the security, implementation, running and maintenance of the hardware and software utilised by Plus Dane.
Data process owners	<p>Any senior manager who is responsible for data processing activities within their service area. They are responsible for ensuring that personal data they have collected or created either directly or indirectly through the data processing activities they are responsible for and / or engage in is maintained, accurate and up-to-date and that personal data, the accuracy of which cannot reasonably be assumed to be accurate and up-to-date, is treated appropriately through erasure or anonymisation</p> <p>They have accountability for maintaining and managing up-to-date Data Sharing Agreements and contracts to ensure that the privacy of data subjects is protected and that third parties are adherent to the UK GDPR and contract obligations, ensures that delegated colleagues have the training, procedures, and tools necessary for the protection of processed data, supports the response to data breaches within their service area, the implementation of mitigating actions, and ensures that lessons learned are adopted, supports the response to Subject Access Requests in their service area and ensures that personal data held and processed is accurate, up-to-date, backed up, and inventoried/registered.</p>
Colleagues, volunteers, casual/temporary workers	Anyone who is directly engaged by Plus Dane to undertake data processing activities including but not limited to employees, volunteers, casual / temporary workers, directors and officers etc. involved in the receipt, handling or communication of personal data must adhere to this policy. Anyone who is not confident in or has concerns about data handling practices that they are undertaking, or witnessing should contact the Data Protection Office. Individuals are expected to complete appropriate training on an annual

Role	Responsibility
	basis. Everyone within Plus Dane has a duty to respect data subjects' rights to confidentiality.
Partner & Third-Party Responsibilities	Any Third Party or Organisation that is commissioned to process data or receives data from Plus Dane or can access any personal data must enter into a legally enforceable agreement with Plus Dane, the nature of which will be determined by the level of involvement with the data that is held / shared / accessed.
Data Protection Officer (DPO)	Plus Dane's appointed DPO responsible for providing the policies, guidance and training needed to ensure compliance with Data Protection Legislation. The DPO will monitor and report to Leadership Team and Audit & Assurance Committee compliance with the policy, ensure any breaches are investigated and maintain suitable records of processing activities. The DPO may co-opt other individuals to assist with the management of data protection obligations.
Data Protection Office	Maintaining the data register. Plus Dane will publish the contact details of the Data Protection Office in both its privacy notices as well as providing them to the ICO. To support this, a DPO email address and page on the Plus Dane website will be maintained.

15 Assurance

15.1 Audit and training

Plus Dane will undertake periodic compliance checks to test whether its policies and procedures are being adhered to and to test the effectiveness of its control measures. Corrective action will be required where non-conformance is found. Records will be kept of all such audits and compliance checks including corrective action requests raised. Disciplinary action may be taken against individuals who fail to act upon the reasonable corrective action requests properly formulated and raised through data protection audits. The Audit and Assurance Committee will be provided with the findings of such audits periodically and reports of data breaches and subject access requests quarterly through the internal controls report.

All Plus Dane colleagues and members will be required to complete initial data protection and annual refresher training. Mandatory training is monitored by Audit & Assurance Committee.

16 Equality Impact Assessment (EIA)

An EIA has considered the elements within the policy particularly the requirements in relation to special category data. There should be no adverse impact on any individuals as a result of this policy.

17 Modern Slavery & Human Trafficking

Personal data that is shared may identify circumstances of modern slavery or human trafficking. This data will be shared with the relevant agencies to prevent crime or to protect individuals from harm.

18 Links to Plus Dane Policies

- Digital Data Storage Policy
- Cyber Security Policy
- Contract Management Policy
- Disciplinary Policies
- Data Governance Framework

PLUS DANE PRIVACY NOTICE – FOR CUSTOMERS

This privacy notice relates to the activities of Plus Dane Housing. Plus Dane has a duty under data protection laws to tell you how we use the personal data we collect about you and the rights you have under those laws. Plus Dane respects your privacy and is committed to protecting your personal data.

By using this website, you signify your acceptance of this notice.

WHO ARE WE?

Plus Dane Housing owns and manages more than 13,500 homes across Merseyside and Cheshire and employs over 500 people working together to deliver support and services to our customers.

Plus Dane Housing is a Data Controller which means that as an organisation we determine the purpose for which, and the way in which the information we collect about you is processed, stored and deleted.

Our registered office is:

Atlantic Pavilion, Salthouse Quay, Royal Albert Dock, Liverpool, L3 4AE.

Our contact details are:

Tel: 0800 169 2988

The company Data Protection Office (DPO) can be contacted at DPO@plusdane.co.uk

INFORMATION WE MAY COLLECT ABOUT YOU

We will collect personal data about you, but we will also collect data about others who we interact with through the course of our activities.

When you first make an application to us for housing:

In order to enter into a tenancy agreement or other type of contract with a customer, we need to collect certain types of personal data. This data ensures we can provide appropriate services and meet the requirements of the Regulator for Social Housing.

Personal data we collect includes:

- Full name (and proof of your identity / photo ID).
- Date of birth (DOB).
- National Insurance number.
- Contact details (phone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf if applicable.
- Basic details (name and DOB) of all household residents.
- Banking details if you pay your rent by Direct Debit.
- Card details if you pay by card (however card details are not stored).
- Benefit and council tax information

- Proof of housing eligibility, any interest or equity in other property.
- Private and social landlord references
- Mortgage lender details
- Credit rating
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud.

It may also be necessary to collect additional information to ensure we can meet the specific needs of our customers.

Additional information may be requested including:

- Disabilities or vulnerabilities.
- Financial information to provide assistance and advice on financial matters.
- Health information when we require this to support funding for adaptations made to the property you are living in.
- Photo ID, bank statements, payslips or income details for processing a house sale or purchase.

Information required for managing your tenancy and contacting you about your housing needs:

- Your support needs, so we know how we can assist you before and during your tenancy
- Details relating to the repair and maintenance of your home
- Information that you provide to your relevant local housing, maintenance or other dedicated team
- Feedback from our contractors, about their appointments with you
- Voice and image recordings for safety, crime prevention and quality management
- We may also record factual information whenever you contact us or use our services, so we have a record of what

The normal types of personal data we collect about other individuals include:

- Details we log if they are a visitor e.g. name, company and time of attendance
- Contact details of individuals from partner agencies

To help you buy part or the whole of your home

- Affordability checks
- Credit ratings

To provide security

- We operate CCTV systems, which collect images and can be used for evidence/intelligence for court proceedings, police information or tenancy enforcement.
- Calls made to our Freephone Customer Access Team, Gas servicing, Income Teams are recorded for training and quality purposes.

To enhance your experience with us

- You can give us details of your friends, relatives or neighbours who you trust, and have provided us with their consent to process their data, to contact us on your behalf.
- Your name and contact details for customer satisfaction surveys, newsletters and service information
- With your consent, your name, photo, video or story could be used for brochures, advertising or press releases
- Details of complaints about our service or other individuals, accidents or incidents involving you or your home
- Your comments about our service or our suppliers' services

When you ask for additional services

- Name and contact details for someone to contact you (the person may be a member of our staff or from another organisation. Where it is a third party, we will advise you before we process your information
- If you ask us for Care and Support requirements, we will hold detailed information about your needs and your family's needs
- Records of payments for the services provided to you
- If you contact us about financial problems, we will hold detailed information about your income and financial situation
- If we offer you training or other learning opportunities, we will ask about your employment and learning history
- We may hold information about your history, for example, regarding credit status or offences, to enable us to determine how best to deliver services to you

Facebook Remarketing (Facebook, Inc.)

Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our website and elsewhere on the internet, and use that information to provide measurement services and target ads. With Facebook remarketing you may see our ads on Facebook after you have visited our site. For this to happen, Facebook uses a Custom Audience Pixel that is activated when a visitor lands on a webpage and a unique 'cookie' is placed in their browser. Facebook lookalike audience targeting allows us to show ads on Facebook to people who are similar to those who have already visited or made a purchase from our website.

In order to understand Facebook's use of data, consult Facebook's [Data Policy](#).

To manage your Facebook ad settings, [click here](#).

To opt out of Facebook's collection and use of information for ad targeting, [click here](#).

Personal Data processed: Cookies, Usage Data.

PROCESSING YOUR INFORMATION

Plus Dane will only process personal data where we have a lawful basis for doing so. There are six lawful basis against which we process information.

1. **Contract Fulfilment** – The processing is necessary for the performance of our obligations detailed in our contract with you. We use this basis for all processing concerning the managing of your tenancy, your account with us and your property.

This extends to us ensuring tenancy conditions are complied with, as signed up to in your tenancy agreements. We use this basis for all processing involved in dealing with anti-social behaviour, detecting and prosecuting fraud or otherwise ensuring that tenancy conditions are complied with.

2. **Consent** – We may ask your consent to use your data for example to supply you with information about any offers and services that you may be interested in. You do have the right to deny consent at the point of request or later if you change your mind.
3. **Legal Obligations** – The processing is necessary in order for us to comply with our legal obligations. We use this basis for all our processing involved in complying with regulations or laws that apply to us.
4. **Vital Interests** – The processing of your data is necessary in order to protect your interests. This would be in order to prevent a life-threatening incident and could include us providing medical and other information to emergency services, if necessary.
5. **Public Interest** – We may need to fulfil a duty given to us by an official authority. This would include our obligation to the government or a local authority where we may be obligated to process your data for specific purposes.
6. **Legitimate Interests** – We may need to process your data for specific purposes not covered in the other types of lawful basis. We would provide justification for doing so whilst ensuring that we balance your rights and freedoms with the needs of our business.

We also process data which relates to the following 'special categories':

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic and biometric data

- Health data
- Sex life details
- Sexual orientation

The legal basis which we rely upon are:

- The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment, social security and social protection law.
- The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
- The processing relates to personal data which are manifestly made public by the data subject.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is necessary for reasons of substantial public interest.
- The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.
- The processing is necessary for reasons of public interest in the area of public health.
- The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

If none of the above conditions apply, we can ask for the data subject's explicit consent (which can be withdrawn at any point).

In certain situations, we may be required to process criminal conviction data which requires us to be able to cite further conditions similar to the special categories – the conditions we can rely upon are:

- The vital interests of data subjects or another individual.
- Processing by a not for profit body (subject to safeguards).
- The establishment, exercise or defence of legal claims.
- Functions provided for by law.
- If none of the above conditions apply, we can ask for the data subject's consent (which can be withdrawn at any point).

We also process information on behalf of organisations. In this case we will only process the data that is provided to us in the way in which the third party instructs us'

Plus Dane strives to ensure that we listen to our customers with regards to the development or improvement of products and services. We therefore may seek customer views on a regular basis through the use of surveys, focus groups or meetings. Where we believe it's necessary to do so we will seek your consent on these matters.

Plus Dane uses a number of IT systems to store personal data. This enables us to ensure the smooth running of the organisation and to provide the appropriate level of service to customers.

Should you have any questions or concerns about our justification for using your personal data, please contact the Data Protection Officer at DPO@plusdane.co.uk.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

There are some instances where your personal data will be shared with third parties and partners who are providing a service to you.

Plus Dane colleagues - personal data is restricted on a need-to-know basis (i.e., colleagues are only given access to data that they need in order to do their job).

Third parties – we do share personal data with some third parties, but these will always be subject to General Data Protection Regulation (UK GDPR) compliant sharing agreements (e.g., we will share customer files with the company that print and distribute your rent statement, and once the task is completed, the data will be deleted by the third party).

Where we ask third parties to process your data on our behalf, we will be clear about how they should use your data and they will not be permitted to use it for any other purpose. Any third parties processing your data are obligated to adhere to the UK GDPR and can be routinely audited by the Plus Dane Data Protection Officer to ensure that your data is being safeguarded properly.

Contractors carrying our work for Plus Dane e.g. we have a number of contractors who support us with the repair, maintenance and compliance of our properties.

Government departments and agencies Department for Work and Pensions (*DWP*), Regulator of Social Housing and Homes England

Who else we may pass your information to?

There may be times when we disclose your details to others, as follows:

- Advocacy partners, contractors and suppliers who provide services to you, or who provide services on our behalf. We will ensure that we have appropriate information sharing protocols in place
- Housing maintenance and repairs contractors to undertake repairs or improvements to your home
- Our out-of-hours service call handling provider Orbis
- Banks to carry out payments through a secure system

- Companies that help us mail out leaflets/newsletters
- Local authorities, other housing and support organisations and statutory agencies
- Mediation partner organisations
- Advocacy partner organisations
- Our solicitors
- Our insurers, in case of public liability claims and similar
- Credit reference agencies for rental tenants
- Debt collection agencies to collect current and former debt
- External assistance where you have agreed to the referral, for example, to investigate money problems
- Training providers or learning institutions
- Utility companies
- Tracing agencies in order to recover debt where no forwarding address is known

In some cases we may have a duty to disclose your information by law to:

- Local authorities, regulatory bodies and government departments
- Police, fire services or health authorities, or medical staff

In particular please be aware

Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct.

- If a customer defaults on any tenancy / licence conditions or obligations of a similar nature, their personal data may be provided to authorised debt recovery agencies or parties acting in a similar capacity, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance.
- We may discuss a customer's financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external debt advice agency, welfare rights advisor, the housing benefit department or the local council housing advice and homeless prevention team to make sure that benefits are paid correctly.
- We may pass data about a customer's rent payment record to credit reference agencies. This will enable them to assist other organisations to assess the customer's financial standing if they apply for products and services.
- We may pass a customer's contact details to a third party to conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you. The third party will be bound to strict terms and conditions outlined by us and will not share their data

with other organisations. Should they choose not to participate in the surveys the third party will securely destroy their data.

- We may share a customer's National Insurance number to verify their Universal Credit application and manage these payments and to prevent and investigate tenancy and right to buy applications fraud.

We don't give anyone access to your information in return for payment for their marketing or commercial purposes.

We won't share your personal information with anyone who claims to represent you unless we're satisfied that you have appointed them, or they act in some recognised official capacity.

Data Retention

Personal data is kept by Plus Dane Housing in accordance with its Personal Data Retention Schedule. Data is retained in accordance with legislative, regulatory or statutory guidelines. It is kept for no longer than is necessary for the purposes for which the personal data are processed. For further information [click here](#).

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You have a number of rights when it comes to the holding and processing of your personal data. You can request:

- **The right to access your data**

You have the right to request access to the personal data that is held for you by Plus Dane Housing.

- **The restriction of processing of your personal data**

You have the right to request that Plus Dane reduces or stops altogether the processing of your personal data.

- **The rectification of your data**

You have the right to ensure that your data is accurate and complete. Should you identify any errors in the data we hold, you can contact us with the details and request that this is amended in our records.

While we assess your request, we will stop processing your data until we determine whether a correction needs to be made.

- **The erasure of your data**

In some instances, you have the right to have your personal data erased. This is also known as the 'right to be forgotten'. This right is not absolute and only applies in certain circumstances. Examples include where the personal data we hold is no longer required for the purpose it was originally collected.

In certain circumstances you may be asked to give consent for us to lawfully process your personal data. Where consent has been given, you may withdraw it, at any time, unless we have some reason to deny your request (e.g. an account in arrears, legal proceedings, or due to significant business or public interests).

- **Rights related to automated processing of your data**

You have the right to have a human being involved in the processing of your data. Where we have systems that make automated decisions, we will always be able to explain in person how the decision-making processes works.

The right to data portability

You have the right to request to move, duplicate or transfer your personal data where you have provided that data directly to us.

To make a request to Plus Dane for details of the personal data we may hold or to exercise any of the rights detailed above please complete the relevant form [here](#).

COMPLAINTS OR QUERIES

We try to meet the highest standards when collecting, processing and storing your personal information. If you feel that our collection, processing or storing of your information is inappropriate in any way, we would encourage you to contact us in order for us to address it. In the first instance you should contact DPO@plusdane.co.uk

Alternatively you can [make a complaint](#) or call us on **0800 169 2988**.

The right to lodge a complaint with a supervisory authority.

If you wish to raise a concern, about the way we have handled your personal information, to a supervisory authority then you can raise this with the Information Commissioner's Office (ICO) ico.org.uk.

Privacy notice for Colleagues and job applicants

This privacy notice applies to job applicants, colleagues, Board Members, Independent Members, Customer Panels and voluntary positions. Plus Dane has a duty under data protection laws to tell you how we use the personal data we collect about you and the rights you have under those laws. Plus Dane respects your privacy and is committed to protecting your personal data.

By using this website, you signify your acceptance of this notice.

WHO ARE WE?

Plus Dane Housing owns and manages more than 13,500 homes across Merseyside and Cheshire and employs over 500 people working together to deliver support and services to our customers.

Plus Dane Housing is a Data Controller which means that as an organisation we determine the purpose for which, and the way in which the information we collect about you is processed, stored and deleted.

Our registered office is:

Atlantic Pavilion, Salthouse Quay, Royal Albert Dock, Liverpool, L3 4AE.

Our contact details are:

Tel: 0800 169 2988

The company Data Protection Office (DPO) can be contacted at DPO@plusdane.co.uk

Information we may collect about applicants

Our purpose for processing your personal data is to assess your suitability for a position that you have applied for.

The lawful basis we rely on for processing your personal data are article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract. And article 6(1)(f) for the purpose of our legitimate interests. The legal basis we rely on to process any personal information that you provide as part of your application relates to:

- our obligation in employment and the safeguarding of your fundamental rights
- assessing your work capacity as an employee
- the purposes of preventative or occupational medicine and for related security measures where necessary

We would categorise this information as 'special' data and it would include personal information such as age, criminal convictions and financial data.

what we do with this information

We will use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any information you provide with any third parties for marketing purposes.

We will use the contact details you provide to make contact and to progress your application. We will use other information you provide to assess your suitability for the role.

what information we ask for and why

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it may affect your application if you don't.

Your personal contact details may be provided to the recruiting manager for the purpose of contacting you to discuss the outcome of the interview or application process.

what happens to your data?

Your application details will be stored in secure electronic files where only our People Team and recruiting Managers have access. Recruiting Managers will not be able to see your equality and diversity information if you have provided it. Your data will not be accessible by any other employees of Plus Dane Housing. Six months after the date of shortlisting (for non-shortlisted candidates) and six months after the date of interview (for shortlisted but unsuccessful candidates) your information will be permanently destroyed, and no record of your application will be held by Plus Dane Housing. For those successful candidates who are offered employment with Plus Dane Housing, your personal information provided at the 'Application Stage' and 'Conditional Offer of Employment Stage' and 'Confirmed Offer of Employment Stage' (see below) is transferred into our People Management systems (iTrent and Sharepoint)"

application stage

Our application processes may ask for a CV and supporting statement via our online application process or completion of an application form. We ask you for your personal details including your name and contact details. We will also ask you about your previous experience, education and details of persons who can provide a reference should your application reach the 'Conditional Offer of Employment Stage'. We will also look for answers to questions relevant for legal purposes and relevant to the position you have applied for.

As Plus Dane is an equal opportunities employer, we also ask for candidates to provide information around equality and diversity. This will be requested via an online form which will only be seen by officers of our People Team. Provision of this information is not mandatory. If you choose not to provide this it won't affect your application. We won't make the information available to any colleague outside of our People Team, including hiring managers; it is for monitoring purposes only. Any information you provide will be used to produce and monitor equality and diversity statistics.

conditional offer of employment stage

If we make a conditional offer of employment to you, we will ask you for information so that we can carry out pre-employment checks and collect information required for payroll purposes. You must successfully complete pre-employment checks to progress to a confirmed offer of employment. We must confirm the identity of our potential member of staff and confirm their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must provide the following in all circumstances of a conditional offer:

- Proof of your identity and right to work in the United Kingdom
- References named on your application form or CV
- Your bank details to enable salary payments to be processed for you. We will only require your bank sort code, account number and bank name,
- Emergency Contact Details – so we know who to contact in the event of an emergency at work affecting you.
- Dependent upon the position conditionally offered to you, you may also be required to provide some or all of the following:
 - A Disclosure and Barring Service Check
 - Evidence of qualifications
 - Proof of a valid photo-card driving license and the 8 digits 'check code' provided to you by the Driver and Vehicle Licensing Agency to enable Plus Dane Housing to validate your eligibility to drive.

Where a candidate cannot satisfy the pre-employment checks at the conditional offer of employment stage the offer of employment will be withdrawn. Any documentation provided by the candidate at this stage will be destroyed save for any information that may be required to be held by Plus Dane Housing by law. Any such information will only be held for as long as Regulations allow.

Confirmed offer of employment stage

We will issue you with a Contract of Employment setting out the Terms and Conditions governing your Employment

Plus Dane colleagues

Colleague personal data is held in a way that accords with our internal Data Register. This document is updated on a continuous basis in compliance with the Lawful Principles relevant to the holding of personal data. If you see anything that you think is unclear, please notify DPO@plusdane.co.uk

sharing your information outside of Plus Dane

We do not share any information with third parties about job applicants who do not progress to employed status.

We will use your registered home address to send Plus Dane related correspondence, mail and packages. Your data may be shared with suppliers and / or delivery companies to facilitate this.

We provide your name, date of birth, and address to TP Health for the purpose of enabling it to contact you to provide you with medical cover under an employer arrangement.

TP Health provide our Occupational Health Service to colleagues at Plus Dane. The personal information provided to them includes; full name, title, date of birth, address, contact telephone numbers, ethnicity, work email address and personal email address.

TP Health will process information about your health in the form of an Occupational Health record which will include details of any medical examinations and health assessments that you have had from the time you joined your employer as well as other relevant medical history. The Occupational Health record will also include advice and reports that have been provided, with your consent, to your employer.

There may be occasions where a referral may be made to Health Assured, our Employee Assistance Programme to provide structured counselling sessions. This will be with your full consent and contact details, along with reason for referral will be made.

For any employee who chooses to join the Plus Dane pension scheme we will share information relating to your name, date of birth and address with The Pensions Trust or the Local Government Pension Scheme through one of either Cheshire Pension Fund or Merseyside Pension Fund dependent upon which Pension Scheme you are a member of.

For any employee who is not a member of the Plus Dane Pension Scheme we will share information relating to your name, date of birth, gender, income, Work Location and Post Title and Full or Part Time status with MercerMarshBenefits, our Life Assurance brokers and with UNUM , our Life Assurance provider, for the purpose of providing Life Assurance cover.

more information on your rights

As an individual, regardless of whether you are a job applicant or an employee you have certain rights regarding your own personal data. For more information on your rights [click here](#).