



Privacy Statement

Date Approved: September 2019

Date of Last Review: November 2022

Date of Next Review: November 2025

POLICY IN BRIEF

Friday Hill TMO (FHTMO) are committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

FHTMO will never sell your personal data (unless we are required to be law) and if we share your personal data, it will only ever be with our partner organisations where necessary to provide services, and only then if we are certain that its privacy and security are guaranteed.

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are. However, if you do not have time to read it all now, please see the quick summary below:

- FHTMO collect information that is either personal data (see section 3) or non-personal data (such as IP addresses, website pages accessed, etc)
- FHTMO collect information about tenants, leaseholders, housing applicants and employees.
- FHTMO collect and use your personal data for several reasons, this depends on how you interact with us and we only collect the information that we need or that would be useful to us in our quest to provide the best possible service (see section 2).
- FHTMO do our very best to keep personal information secure (see section 6).

- FHTMO never sell your data and we will never share it with another company or charity for marketing purposes.
- FHTMO will not share your data, unless we are required by law or to organisations we work with where necessary to provide our services and only then provided that the privacy and security of data is guaranteed (see section 4).

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1. OVERVIEW

FHTMO collect, hold and process personal information about our customers and employees to allow us to provide social housing accommodation and services.

FHTMO also process personal information using CCTV systems to monitor and collect visual images for the purpose of security and the prevention and detection of crime.

This privacy notice tells you what to expect when the organisations processes your personal information, how it is used, shared and secured.

Your privacy is important to us and we are therefore committed to handling your personal data in accordance with the provisions of the Data Protection Act 1998, General data Protection Regulation 2016/679, and any subsequent changes to data protection legislation.

Data Controller: Friday Hill TMO LTD

Data Protection Registration Number: ZA313175

To access information held about you: info@fridayhilltmo.org.uk

2. WHY WE PROCESS DATA

FHTMO collect and use your personal data for several reasons, this depends on how you interact with us.

Some of the reasons are things we must do by law/under our statutory obligations, such as:

- Allow us to submit data as required to national central public bodies i.e. HM Revenues and Customs, Health and Safety Executive.
- Make sure we meet our statutory obligations including those related to diversity and equalities.
- Crime prevention, national and local fraud initiatives, prosecution of offenders including the use of CCTV.
- Safeguarding vulnerable children and adults.
- Where relevant Data Protection legislation allows us to process data (Data Protection Act 1998) (General Data Protection Regulation 2016/679).
- Corporate administration and all activities we are required to carry out as a data controller and public authority.

Some of the reasons will be to provide a range of services to local people and businesses, which include:

- Letting, renting and leasing properties.
- Management of your tenancy.
- Supporting and managing our employees.
- Carrying out health and public awareness campaigns.
- Managing our property.
- Administering the assessment and collection of taxes and other revenue including benefits and grants.
- Licensing and regulatory activities.
- Internal financial support and corporate functions.
- Managing archived records for historical and research reasons.
- Data matching under local and national fraud initiatives.

- Understanding what we can do for you and informing you of other relevant services and benefits.

Some of the reasons will be because you have signed up to receive a service the organisations offers or given your consent for us to use you details so that we can:

- Understand your needs to provide the services that you request.
- Carry out surveys and getting your opinion on our services.
- Undertake research.

FHTMO may not be able to provide you with a product or service unless we have enough information, or your permission to use your information. We aim to keep your information accurate and up to date.

3. CATEGORIES OF DATA WE COLLECT

FHTMO will need to collect your personal or special category data of a more sensitive nature, to deliver some of our services. This may be based on a legal requirement for us to provide a service, or it may be a service you have signed up (consented to).

No more information will be collected than is required to deliver that service.

Types of personal information we may collect about you may include:

- Personal details (name, date of birth)
- Identification numbers (e.g. NHS number, National Insurance Number)
- Family details
- Lifestyle and social circumstances
- Goods and services
- Economic / financial details
- Employment and education details
- Housing needs
- Visual images, personal appearance and behavior
- CCTV images
- Business activities
- Case file information
- Birth / death data provided by / to the office of national statistics

Special categories of data (also known as sensitive personal information), that we may hold about you include:

- Physical or mental health details
- Social care needs
- Ethnic origin
- Trade union membership
- Political affiliation
- Political opinions
- Offences (including alleged offences)
- Religious or other beliefs of a similar nature
- Criminal proceedings, outcomes and sentences
- Genetic or biometric data
- Sex life or sexual orientation

Equalities information

FHTMO may use some information for statistical reasons about the population of the city and the take up of organisations services by various groups. This is to help comply with our legal obligations and to plan the provision of future services. This analysis will not identify individuals, nor will it have impact upon an individual's entitlement to organisations services and facilities.

This could include:

- Ethnic background
- First language
- Gender
- Sexual orientation
- Age

4. WHO YOUR DATA IS SHARED WITH

To provide services

Your personal information may be shared with internal departments or with external partners and agencies, including charities involved in delivering services on our behalf which you have consented to using. They will only have access to your information on a

needs to know basic information, your privacy and the security of the information is assessed when a new sharing partner is identified.

Examples are:

- Other local authorities
- Contactors and partner agencies
- Providers of goods and services
- Local and central government
- Ombudsman and regulatory authorities
- Licensing authorities
- Health bodies
- Partners that are part of National or Regional improvement projects

FHTMO also share information with third party organisations such as insurers, solicitors who are acting on your behalf. This is usually done with your consent, unless there is a legal reason (as below) to share without your consent.

To comply with the Law

FHTMO may also provide personal information to third parties, this may be in cases where it is necessary to do so, to comply with the law or where permitted under Data Protection legislation (Data Protection Act 1998) (General Data Protection Regulation 2016/679).

Examples of third parties who we may share your information include (but are not limited to):

- Health bodies (NHS Trusts, GPs)
- The Police
- Regulatory bodies such as the Department of Work and Pensions
- Care Quality Commission
- Courts, prisons
- Other local authorities

FHTMO put agreements in place with partners we share with, to ensure we all protect your data properly and are only sharing the minimum amount of data we need to, to

provide you with a service. Where we need to share sensitive or confidential information such as medical details, we will do so only with your permission or where we are legally required to. We may share information to prevent risk of harm to an individual, for example in the case of safeguarding.

The detection and prevention of fraud

FHTMO are required by law to protect our public funds; therefore, we may use any of the information you provide to us for the prevention and detection of fraud or to comply with the law and to help with other legal duties including the collection of taxes, charges and other enforcement duties. As well as conducting our own 'Data Matching' we may also share your information with other public bodies. These include (but are not limited to):

- London Borough of Waltham Forest
- The Audit Commission
- Her Majesty's Revenue and Customs (HMRC)
- Department for Work and Pensions
- National and Local fraud initiatives
- The Police
- Health Bodies (NHS Trusts, GPs)
- Other local authorities

FHTMO may also share information with utility companies, credit reference agencies, insurers, service providers or contractors and partner organisations, where the sharing of information is necessary, proportionate and lawful.

FHTMO may share your data with third countries or international organisations, only where there is a legal reason to share, you have provided consent for us to share, and where there are appropriate safeguards in place to ensure the level of protection of your data is guaranteed.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerized data matching allows potentially fraudulent claims, transactions, applications, taxes and payments to be identified.

Where a match is found it indicates that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out. Regardless of the outcome data matching helps to ensure records are up to date and accurate.

FHTMO participate in the Cabinet Office's National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for each exercise. The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. Data matching by the Cabinet Office is subject to a Code of Practice.

View further information on the Cabinet Office's legal powers and the reasons why it matches particular information.

5. HOW WE COLLECT YOUR DATA AND WHERE FROM

Face to face:

FHTMO may keep a record of your contact in order to assist on the delivery and improvement of the services we provide to you and others. Any such records that include any personal information will be kept securely.

Telephone calls:

Ordinarily we will inform you if we record or monitor any telephone calls you make to us. This is to increase your security, for our record keeping of the phone call and for training and quality purposes.

Emails:

If you email us we may keep a record of your contact and your email address for our record keeping. We will not include any confidential information about you in any email we send to you unless sent securely or you have agreed to us contacting you with this information. We would also suggest that you keep the amount of confidential information you send to us via email to a minimum.

On paper:

You may complete assessment forms or request forms on paper that you send to us. You may write us letters and send these in on paper.

Online:

You may complete online forms, make requests or make online payments to us.

On systems:

FHTMO may log any information you provide to us on a computer system to help us keep track of your request, or any actions we need to complete. We may add your information to systems where we are required to by law.

From other sources:

FHTMO may receive information about you from other organisations or agencies such as:

- London Borough of Waltham Forest
- The Audit Commission
- Educators, examining bodies
- Local and central government (e.g. HMRC, Department of Works and Pensions)
- Ofsted, Ombudsman and regulatory authorities
- Licensing authorities
- Health bodies (NHS Trusts, GPs)
- Care Quality Commission
- The Police
- Courts, prisons
- Partners that are part of the National or Regional improvement projects.
- Providers of goods and services
- Other local authorities

FHTMO will receive information about you either for a legal reason or because you have asked for your information to be shared with us. Information can be provided to us by any of the other formats described in this section. We may add this information to our systems to record and hold it as part of your record with us.

6. HOW YOUR DATA IS USED

Information which you have provided to us will be stored securely. It will be used for the purposes stated when the information was collected, and not reused for different purposes or sold on to others.

Your data will be placed on an appropriate system, such as Information Management Systems that hold data about you and your tenancy and Electronic Records Management Systems that hold copies of your scanned tenancy and identification documents. These are used to provide or administrate our services. We may cross reference this data between systems to keep your information as accurate and up to date as possible in line with Data Protection best practice.

Some areas of the organisation that use your personal data have very specific reasons for doing so. Some of our departments may ask you to complete assessments that result in an automated decision being made about you or could be seen as profiling. You can ask us to explain the outcomes of any automated decisions made about you.

7. OUR RESPONSIBILITIES

Everyone working for us has a legal duty to keep information about you confidential and secure, for specific purposes and only for as long as necessary. Legislation and best practice guidance that we abide by are:

- Data Protection Act 1998 / General Data Protection Regulation 2016/679
- Human Rights Act
- Caldicott Principles relating to confidentiality
- British Standard and International Standard (BS/ISO) 15489-Records Management
- Lord Chancellors Code of Practice on Records Management

Each of the departments within our organisation may have additional specific pieces of law or guidance they must follow which have an impact on recording or using the information we hold. For example, Guidance from professional bodies on record keeping for Social Workers.

Where FHTMO share information with other bodies or agencies, FHTMO will ensure the confidentiality and security of your data. This will normally be done by having a contract and confidentiality clauses in place. FHTMO also carry out data privacy impact

assessment each time we start a new project, to help us build in security and privacy to protect your information.

FHTMO will keep your information in line with legislation and guidance on records retention periods. We will not keep your information longer than it is needed. We will dispose of paper records or delete any electronic personal information in a secure way.

FHTMO do not share your data with private companies, unless they have a contract with us to provide a service on behalf of us. For example, a company who will conduct a survey on our behalf can only use the data we give them for our survey and they must delete it after the work has been completed.

8. YOUR DATA RIGHTS

Under the Data Protection Act 1998 / General Data Protection Regulation 2016/679 you have rights of how your personal and special category (known as sensitive) information is used. Please see the Information Commissioners Office guidance.

- You have the right it to be informed of how we are processing your data. This Privacy Notice explains this in detail.
- You have the right to ask for incorrect data to be rectified.
- You have the right to request the deletion or removal of personal data where there is no reason for its continued processing.
- Where you have signed up to an organisations service which relies on your consent alone (i.e. the service is not covered by a statutory duty) you have the right to withdraw your consent.
- The right of access to your data (from 25th May free of charge). All requests must be made in writing to the organisation, contact details are below.

Email:	info@fridayhilltmo.org.uk
Post:	Friday Hill TMO Chingdale Centre 19 Chingdale Road Chingford E4 6HZ
Telephone:	020 8523 9433

9. ACCESS TO NON-PERSONAL ORGANISATION DATA

We routinely publish sets of non-personal data we hold. You may find what you are looking for on the disclosure log.

If you have a different question you can make a request for non-personal information which Friday Hill TMO Management Board may hold as part of their work under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.

10. HOW TO RAISE A COMPLAINT ABOUT INFORMATION

If you have a complaint in relation to a request to see a copy of your records or a freedom of information request, please contact us in the first instance to request an internal review of our response. You can use the contact details from section 8 "Your data rights"

If you follow this procedure and are still not happy, you may wish to contact The Information Commissioner's Office:

Post: The Information Commissioner's Office
Wycliffe House
Wilmslow
Cheshire
SK9 5AF

Telephone: 0845 630 60 60

Email: casework@ico.org.uk

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