

## **TRANSPARENCY STATEMENT HOW WE USE YOUR PERSONAL INFORMATION (COLLECTIVE RSL MEMBERS)**

We, Ochil View Housing Association, East Lothian Housing Association, Grampian Housing Association, Castlehill Housing Association, Berwickshire Housing Association, Hillcrest Homes (Scotland), Sanctuary Scotland Housing Association, Osprey Housing, Inverclyde Common Housing Register (represented by Cloch Housing Association, Oak Tree Housing Association, Sanctuary Scotland Housing Association, Larkfield Housing Association and Link Group), Angus Housing Association and Homes for Life Housing Partnership, jointly manage and operate the “These Homes” choice-based lettings platform at [www.thesehomes.com](http://www.thesehomes.com)

When you submit a housing application on These Homes, the personal information contained within your application is made available to us. We are joint controllers of that personal information, which means that we are legally responsible for how we hold and use personal information about you. It also means we are required to comply with data protection laws when holding and using your personal information.

This includes providing you with the details contained within this statement of how we hold and use your personal information, who we may share it with and your rights in relation to your personal information.

We have each appointed the following Data Protection Officers (DPO):

- Ochil View Housing Association  
Daradjeet Jagpal, [ochilviewdpo@infolawsolutions.co.uk](mailto:ochilviewdpo@infolawsolutions.co.uk), 07446 730 475
- East Lothian Housing Association  
Jackie Robinson, [enquiries@elha.com](mailto:enquiries@elha.com), 01620 825 032
- Grampian Housing Association  
[dataprotection@grampianhousing.co.uk](mailto:dataprotection@grampianhousing.co.uk), 01224 202900.
- Castlehill Housing Association  
Alison Watson, [alison.watson@castlehillha.co.uk](mailto:alison.watson@castlehillha.co.uk), 01224 628 103
- Berwickshire Housing Association  
Daradjeet Jagpal, [data@berwickshirehousing.org.uk](mailto:data@berwickshirehousing.org.uk), 01361 884000
- Hillcrest Homes (Scotland)  
Information Governance Adviser, [informationgovernance@hillcrest.org.uk](mailto:informationgovernance@hillcrest.org.uk), 0300 123 2640
- Sanctuary Scotland Housing Association  
The Data Protection Officer, [data.protection@sanctuary-housing.co.uk](mailto:data.protection@sanctuary-housing.co.uk), 0800 917 0179 or 0300 123 9152
- Osprey Housing  
Sofia Redford, [sredford@ospreyhousing.org.uk](mailto:sredford@ospreyhousing.org.uk), 01224 548015
- Inverclyde Common Housing Register, represented by:  
Cloch Housing Association – Liz Bowden, [lbowden@clothhousing.org.uk](mailto:lbowden@clothhousing.org.uk), 01475 783 637  
Oak Tree Housing Association – Anne Culley, [aculley@oaktreeha.org.uk](mailto:aculley@oaktreeha.org.uk), 01475 807 000  
Sanctuary Scotland Housing Association – see above  
Larkfield Housing Association and Link Group - Sharon Rowatt, [Sharon.rowatt@larkfieldha.org.uk](mailto:Sharon.rowatt@larkfieldha.org.uk), 01475 603 571

- Angus Housing Association  
Daradjeet Jagpal, angusdpo@infolawsolutions.co.uk, 07465 252 182
- Homes for Life Housing Partnership  
Mark Chynoweth, mark@rgdp.co.uk, 0131 222 3239

## **1. What personal information do we hold and use about you and why?**

We hold and use the personal information and special category information listed in the schedule to this statement for the following purposes:

- process and manage your housing application, assess housing need and consider your housing requirements;
- consider your bids for properties in our respective areas;
- verify the information provided by you as part of your housing application;
- comply with legal requirements that apply to us as registered social landlords in Scotland;
- comply with our equal opportunity monitoring obligations;
- compile anonymous statistical information on housing needs, including for internal Committee and external regulatory reporting;
- communicate with and inform you of the outcome of your bids;
- consider and respond to complaints about your bids;
- allocate housing in accordance with our choice-based lettings system;
- obtain references about you from your previous landlords (if applicable);
- prevent and detect fraud and take steps to terminate your tenancy (if you are successful and allocated a property), if fraud is later discovered; and
- otherwise protect and defend our legal rights in the case of a dispute between us.

## **2. What is our legal basis for holding and using your personal information?**

Data protection laws require us to have a legal reason for holding and using your personal information. Our legal reasons for holding and using your personal information are as follows:

### **Personal information**

- Contract: the holding and use of personal information is necessary for the purposes of taking steps to enter into a tenancy agreement with you, if your bid is successful.
- Legal obligation: the holding and use of personal information is necessary for compliance with a legal obligation which applies to us in terms of the undernoted legislation.

Legislation referred to: Housing (Scotland) Act 1987; Equality Act 2010; Human Rights Act 1998; and the Scottish Social Housing Charter.

### **Special category information**

- Substantial public interest: the holding and use of special category information is necessary for the purposes of the exercise of a function conferred on us by the undernoted legislation for reasons of substantial public interest.

Legislation referred to: Housing (Scotland) Act 1987; Equality Act 2010; Human Rights Act 1998; and the Scottish Social Housing Charter.

### **3. Who do we share your personal information with?**

We may share your personal information with other organisations for the purposes described in section 1 of this statement, including:

- other registered social landlords for housing allocation purposes, if you provide
- your consent at the point of registration on These Homes;
- third parties from whom we may seek more information about you and to verify
- the information provided by you as part of your housing application, including
- your previous landlords;
- Scottish Housing Regulator;
- law enforcement and fraud prevention agencies; and
- our consultants, auditors, solicitors, advisers and IT service providers.

### **4. Will my personal information be sent outside the UK?**

Some of the organisations who we share your personal information with (listed in section 3 of this statement) may be based outside the UK. Their handling and use of your personal information will involve us transferring it outside the UK. When we do this, we will ensure similar protection is afforded to it by:

- only transferring it to countries that have been deemed to provide an adequate level of protection for personal information as a matter of data protection law; or
- using specific contracts with such organisations, which are approved for use in the UK, and which give your personal information the same protection it has in the UK.

Please contact our respective DPOs (contact details provided above) for further information on the specific mechanism used by us when transferring your personal information outside the UK.

### **5. How long do we keep your personal information?**

We will only keep your personal information for as long as we need to for the purposes described in section 1 of this statement, including to meet any legal, accounting, reporting or regulatory requirements. More information is contained in our respective data retention policies, which are available by contacting our respective DPOs (contact details provided above).

### **6. What rights do you have in relation to your personal information that we hold and use?**

It is important that the personal information that we hold about you is accurate and current. Please keep us informed of any changes. Under certain circumstances, the law gives you the right to request:

- A copy of your personal information and to check that we are holding and using it in accordance with legal requirements.
- Correction of any incomplete or inaccurate personal information that we hold about you.
- Deletion of your personal information where there is no valid reason for us continuing to hold and use it. You also have the right to ask us to do this where you object to us holding and using your personal information (details below).
- Temporarily suspend the use of your personal information, for example, if you want us to check that it is correct or the reason for processing it or to stop us from using your personal information altogether if we have committed a breach of data protection laws.
- The transfer of your personal information to another organisation.

You can also object to us holding and using your personal information where our legal reason is a legitimate interest (either our legitimate interests or those of a third party).

Please contact our respective DPOs (contact details provided above) if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

## **7. Feedback and complaints**

We welcome your feedback on how we hold and use your personal information, and this can be sent to our respective DPOs (contact details provided above). You have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use your personal information.

The ICO's contact details are as follows:

**Telephone: 0303 123 1113**

**Website: <https://co.org.uk/concerns/>**

If you would like to receive this statement in alternative format, for example, audio, large print or braille, please contact us.

## **8. Updates to this statement**

We may update this statement at any time, and we will provide you with an updated version when required to do so by law.

Last updated: May 2022

## **SCHEDULE**

### **PERSONAL INFORMATION AND SPECIAL CATEGORY INFORMATION**

- Name
- Address, address history for the last 5 years and correspondence address
- Current housing circumstances, type of property you currently live in and its condition and / or your homeless status
- E-mail address
- Telephone number
- Date of birth
- Gender
- Ethnic origin
- Medical conditions, health and details of your family doctor
- Your and / or another household member's disability status and type of any disability
- Requirement for an adapted property and the type of adaptation required
- Your and / or another household member's pregnancy status
- Employment and financial circumstances, including any financial hardship and Any support you require to sustain a tenancy
- Your region and accommodation preference for housing allocation
- Your and your household members' property ownership status
- Family and relationship circumstances
- Household information, including details of who will be moving in with you, And particulars of children, comprising their gender, date of birth, whether they are under or over 16 years of age and if they share a room with another adult
- Support you provide to a friend or relative or support you receive from a friend relative
- Pet ownership
- Reasons for moving
- Your and your household members' right to reside in the UK
- Complaints made against you and / or any of your household members for Antisocial behaviour within the last 3 years
- Outstanding arrears or any tenancy-related debt owed by you or any of your household members
- Your and / or another household member's registration with the Police under The Sexual Offences Act 2003
- Your and / or another household member's convictions for violent offences
- Your relationship to any of our employees or committee members
- Whether you are one of our employees or committee members