

# Abri Customer and Community Privacy Notice

7 June 2022 V.2.5

Here at Abri, we are committed to protecting your privacy and take the security of your information very seriously.

This Privacy Notice sets out how we will use and protect all information we collect about our Customers, and those living in communities where we have homes. This is in accordance with the UK General Data Protection Regulation 2020, the Data Protection Act 2018 and any related or successor legislation ('Data Protection Legislation').

This notice applies to all current, former and potential customers who live in our homes as a tenant, shared owner, occupier or any other kind of lessee or sub-lessee, who have access to housing or landlord services we provide. It also applies to neighbours, visitors, and to any next of kin that has been nominated by our customers.

We also have other specific privacy notices (listed below), which may apply to you if you have another kind of relationship with Abri. Some of these can be found on our website <https://www.abri.co.uk>, and others are available on request:

1. Colleague Privacy Notice
2. Board Member Privacy Notice
3. Job Applicant Privacy Notice
4. Contractor Privacy Notice
5. Home Buyer Privacy Notice
6. Customer's Authorised Contact Privacy Notice
7. Buddy Club Privacy Notice

We process your data in accordance with relevant Data Protection Legislation, this Privacy Notice and our General Data Protection Policy.

## **Who we are**

When we say 'we' or 'us' in this document we're generally referring to those companies which are landlords or service providers to our customers and form part of the Abri Group of Companies, of which Abri Group Limited is the parent company, namely:

- Abri Group Ltd
- The Swaythling Housing Society Ltd

These organisations are data controllers and in this Privacy Notice are collectively known as Abri.

### **What sorts of information do we collect and hold**

We collect and process a range of data about you. Depending on the relationship we have with you, this may include:

- Name,
- Date of birth
- Current, previous and forwarding addresses
- Telephone numbers and email addresses,
- Next of Kin details (for use in emergencies)
- The number and age of people in your household
- Your authorised contact details (email, mobile phone number and landline number)
- Employment details and state benefit entitlements
- Information about your employment status and income levels
- CV, employment and training history and information regarding your digital skills
- National Insurance number
- Records of anti-social behaviour (for more information please contact us and ask for a copy of our Anti-Social Behaviour Policy)
- Records relating to your interactions with our staff (including telephone recordings)
- Information concerning your obligations to us as our tenant or lessee, including rent payments and arrears, or service charges, and compliance with your tenancy contract or lease agreement
- Information concerning your welfare and ability to live independently at home
- Particular needs or conditions that our staff should be aware of when visiting your home
- Other agencies involved with your household
- Details of safeguarding risks to children or vulnerable adults (for more information please contact us and ask for a copy of our Anti-Social Behaviour Policy)
- Financial details – bank or building society account details to enable Direct Debit payments; credit ratings
- Responses to surveys
- Photos
- Copies of ID documents

We also process special categories of information (sometimes called ‘sensitive information’) that enable us to provide services that will meet your needs, protect your interests and those of others who live in Abri homes and nearby communities, and also to comply with our legal obligations under Equalities Legislation. These special categories may include:

- Physical or mental health and disability details, any special adaptation needs you may have as a result of these, and your role as a carer for others in the household.
- Criminal offences, alleged criminal offences, and unspent convictions

- Equalities data, including ethnic origin, religious belief, sexual orientation and transgender status

### **Children's Data**

We collect the personal data of the children who live in Abri homes so that we know who all our customers are, tenants and occupants alike, and can fulfil our obligations as landlord to everyone who lives there. We rarely collect more information than name and age of these children but to the extent that they may occasionally be mentioned in our customer contact or case records (because of information we have been given by our adult customers) we do also have this information on our records too. Sometimes we also invite customers to apply to participate in Abri funded community activities or services, or to take advantage of our careers related services. If children in your household wish to take part we will then collect data that is relevant to these activities/services too. This may include: details of their school, education, hobbies and sporting interests, and any medical conditions, disabilities or impairments that may affect their ability to participate, or require us to make appropriate adjustments to improve access.

If it comes to our attention that any children living in our homes are at risk we will also process the data necessary to provide a referral to Children's Social Services.

### **Closed Circuit Television (CCTV)**

The CCTV systems installed across our buildings and sites are for safety and crime prevention only. Clearly visible notices are provided where CCTV is used, except in the rare instances where covert CCTV is in place (directed away from public spaces) for legitimate legal reasons i.e. in cases of ongoing serious ASB, domestic violence or other criminal actions perpetrated against a particular household. The reception area and interview rooms of certain Abri corporate buildings have CCTV and optional voice recording facilities which will only be activated with your knowledge (usually by use of notices).

CCTV images can be shared with lawyers, police and other agencies working to prevent or investigate crime, improve public safety or resolve antisocial behaviour.

CCTV images may also be shared with insurance companies for the purpose of determining liability for damage or harm caused by an incident involving those shown in the footage.

CCTV images are also retained for up to eight weeks or, until enforcement action is complete, and images that are no longer required will be destroyed.

Abri has a CCTV policy which can be accessed on request.

### **How we collect information about you**

We collect information about you throughout our relationship. This includes:

- When you apply for a home

- When you sign a tenancy, shared ownership, lease or tenancy exchange agreement
- Through ongoing contact with you during a tenancy or lease
- When you access services by logging onto our website or customer portal
- Recording information from calls and on-line chats with us
- When you terminate a tenancy or the resale process
- If you make a complaint
- When dealing with anti-social behaviour (ASB) issues, which you or one of your neighbours has raised
- When we provide welfare & benefits advice or support
- When we provide employment support or training advice
- When you respond to our surveys
- If you enrol as a member of our Community Pantry or Good Grub Club schemes
- If you get involved with residents' scrutiny discussions

In some cases, we may collect information about you from third parties, such as your next of kin or authorised contacts, local authorities (eg. social services or occupational therapists), landlords, medical and health services, the police or neighbours (in the case of complaints or concerns raised about you).

### **How do we use your information?**

We process personal information to enable us to manage our business of providing social and affordable housing, accommodation and services, which may include any of the following:

- Letting, renting, leasing and selling properties (including shared ownership, right to buy and right to acquire)
- Managing tenancies and leases
- To facilitate tenant mobility by enabling mutual exchange of rented properties
- To facilitate your access to third party financial credit services eg. hire purchase of household goods
- Maintaining and repairing our rented or leased properties
- Collecting and receiving rent (including arrears), service charges and charges for additional services;
- Administering waiting lists
- Providing certain welfare and benefit related services, advice and support
- Maintaining our accounts and records
- Provision of customer service
- Ensuring that our properties are kept in good order
- Training and monitoring service provision
- Monitoring and resolution of anti-social behaviour and disputes
- Safeguarding of children and vulnerable adults who live in or nearby our properties
- Ensuring the protection of our staff, contractors and those other tenants or visitors to our properties who may be affected by criminal or anti-social behaviour
- Investigating complaints
- Providing education, employment and training advice

## Abri Customer and Community Privacy Notice

- Providing independent and supported living services
- Providing/facilitating access to community based activities eg sports and fitness
- Fraud and money laundering prevention.
- Processing requests from third parties dealing with e.g. council tax, shelter, homelessness
- Better understanding your needs and those of our other tenants or people who will live in proximity to you
- For ensuring that our staff are always properly informed and equipped to provide the services you are entitled to receive, in a way that addresses both your needs and theirs.
- Making organisational improvements
- Engaging with our customers to get feedback on our current services and any improved or expanded service offers which we may provide or procure from others for your benefit in future
- Providing details of promotions, opportunities and special offers which may be of interest to you (with your consent, where appropriate)
- Getting in touch with you via phone, email, post or the customer portal
- Complying with our legal obligations, including health and safety.
- Providing optional additional safety and wellbeing services to those who live in our properties
- Managing legal risk and obtaining legal advice/representation where necessary
- Responding appropriately to public health emergencies
- Making strategic decisions based on evidence regarding levels of affordability among our customer-base

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research, surveys or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Who may provide us with information about you**

Occasionally we are provided with information about you by third parties. These may include:

The Fire Service – in relation to safe and well visits, or after attendance at an emergency call-out at your home

The Police – in relation to anti-social behaviour or to verify/check details of unspent convictions or sex offender registration at time of letting a property or extending a tenancy

Local authority social services – in relation to safeguarding matters

Local authority home-finder services – in relation to applications for an Abri home

Local authority housing services – in relation to threatened homelessness

Specialist tenancy support service providers – Housing First – if your tenancy is supported by them.

Agencies involved in providing specialist support services for employment and career advice, and related training

Neighbours or other members of the public - who are reporting alleged anti-social behaviour or other issues affecting your tenancy

Any person that has been appointed by you under the Abri 'Authority to Discuss' procedure – allowing them to speak on your behalf about matters designated by you.

Any person who is designated under a Power of Attorney to speak or act on your behalf

### **Who we might share your information with?**

Where it is necessary to share information about you, we will always comply with all aspects of Data Protection Legislation. Set out below are examples of when this may occur.

Some of your information will be accessible by colleagues, with those parts of our organisation that are involved in supporting our services to you. Sometimes, we appoint third parties to do work for us which may involve them processing your data on our behalf.

Occasionally we need to share personal information we hold about you with others, including next of kin (particularly in emergencies or when we urgently need to carry out gas safety inspections and are struggling to fix an appointment with you), or with anyone who has been designated by you as authorised to receive information in specific circumstances, or to help you manage your account with us.

Sometimes, we may need to share your information with other organisations. We will only do so when reasonably necessary, and when we have a lawful basis, either because you have consented, or the Data Protection Legislation enables us to do so for another reason, for example because we need to do so in performing our landlord obligations or because it is in our legitimate interests to do so in running our business effectively and efficiently. Occasionally we share your information because we are compelled to do so, for example, because a court has ordered it, or because we have to do so under law.

Where reasonably necessary and lawful, we may share certain information with:

- Contractors (who carry out repairs, safety work, maintenance, emergency response services and installations)
- Out of hours emergency customer contact services
- Local authorities (including homelessness units, social services, occupational therapists and council tax depts)
- Organisations providing specialist tenancy support services eg Housing First.
- Agencies involved with benefits and tax credits (including the DWP and Pensions service)
- Organisations which provide educational and career-based training (**always with your consent**)
- Other registered providers of social housing providing tenancy support services (**always with your consent**)

- Organisations that provide community based sports , fitness or wellbeing activities to adult or child customers **(always with the consent of the participant or their parent, if under 16)**
- Charities and voluntary agencies **(always with your consent)**
- Health services (including GP) **(always with your consent, unless in case of a life-threatening emergency)**
- Police and law enforcement agencies
- The Financial Conduct Authority and HMRC
- Probation services
- Emergency services
- Schools and examining bodies
- Anyone you have appointed as your authorised contact for management of your tenancy, or who is formally registered (by the Office of the Public Guardian) as your lawful attorney under a Lasting Power of Attorney
- Designated Tenant Panel for review and resolution of formal complaints **(always with your consent)**
- Home service and care providers
- The NHS Trust which employs you if you rent accommodation from us connected to your work with the NHS.
- Other landlords **(always with your consent, where a reference is being provided)**
- Utilities companies
- Insurance companies
- Courts and tribunals
- The Regulator of Social Housing
- Central government departments
- Auditors
- Debt collection agencies
- Credit reference agencies, to facilitate social housing fraud checks
- Survey and research organisations
- Press and the media **(always with your consent)**
- Financial service providers and advisors
- Mortgage administrators and lenders
- Solicitors

### **Lawful Grounds**

We collect, use and occasionally share your information for reasons which are recognised as lawful. These include:

1. the performance of: our landlord's obligations under your tenancy, lease or shared ownership contract with us; or other service contract we may have with you.
2. compliance with obligations imposed by law on us as landlords and as an organisation that processes financial payments;
3. protecting the vital interests of our customers, staff or contractors when their life, health or well-being are seriously at risk;

4. the performance of a task carried out in the public interest eg. safeguarding of children and vulnerable adults;
5. our legitimate interest in:
  - preparing to enter into a contract with you (tenancy, shared ownership or lease) including all necessary due diligence and disclosure
  - taking due care of our housing stock,
  - ensuring that payment due for rent, [service charges](#), utility bills or council tax incurred while living in our housing is paid by our tenants, former tenants, lessees and former lessees
  - ensuring that payment due for rent is covered by Universal Credit payments to the extent of the customer's entitlement
  - prevention of fraud or other criminal activities that might cause harm to our business or to our customers or contractors
  - helping to make the communities where our tenants or lessees live safe and secure environments
  - protecting the viability of our business, so that we can continue providing affordable housing to people who need it
  - contributing to the government and local authority's efforts to reduce homelessness within our communities
  - taking legal advice or bringing legal proceedings
  - facilitating the wellbeing of our colleagues and customers
  - enabling others (eg. our customers or contractors) who have sustained damage or harm to take lawful action to recover damages or seek other legal redress for their loss
  - ensuring that our staff are always properly informed and equipped to provide the services you are entitled to, in a way that addresses both your needs and theirs; and,
  - making strategic decisions that are based on evidence regarding levels of affordability among our customer-base
6. when you have provided us with your consent, eg. to allow us to send you information about services and opportunities that might interest you as our tenants. For more information on consent see page 7 of this Notice.

When we have collected sensitive information, we need additional special reasons for doing so and these might include:

7. your express consent
8. it is necessary for social protection, being intended to reduce risk to customers which flow from old age, ill-health or disability
9. it is necessary for bringing or defending a legal claim
10. it is in the substantial public interest, for example in respect of measuring and monitoring performance against equalities standards.

Abri has a Special Category Data Processing Policy that sets out in greater detail how we justify using sensitive data in specific situations. Please contact us at [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk) if you would like to know more about this.

### **Use of Text Analytics (AI) Tools**

The software used in our customer survey feedback analyses sentiment by natural language processing techniques to focus on indicators in use of language to determine how customers feel about our services. By understanding grammatical structures, verbs and nouns and the sequences in which they appear, the Sentiment Engine provides an 'emotional response indicator'.

### **How long we keep your information**

We will always keep your information in accordance with the law and regulation, and we'll never keep your information for longer than is reasonably necessary.

Your basic tenancy or lease information (i.e. your name, date of birth and address while a tenant of any landlord within the Abri Group) will be stored permanently against any tenancies you have had with us but once your tenancy has ended, we aim to delete all other information six years after your tenancy has ended.

Recordings of standard telephone conversations are held for a period of time which will not exceed six weeks unless they are deemed abusive or threatening, or if they contain content which is relevant to an ongoing investigation, in which case they will be kept until all relevant investigation actions are complete.

### **Information security**

We take the security of your data seriously, and we have internal policies, controls (electronic, physical and managerial) and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed unlawfully to others, and is only accessed by our colleagues in the proper performance of their duties. These security measures include:

- Limiting access to our building to those we believe are entitled to be there (by the use of key card passes and ID Badges)
- Implementing access controls to our technology and devices, such as firewalls, ID verification, and encryption.
- Implementing strict procedures which limit access to your data only to those staff or contractors who need to see it in order to carry out their jobs and/or deliver services to you.
- Never asking you directly for your passwords.

If you are registered with our customer portal, you are the owner of your username and password, you mustn't share this information with anybody else.

## **International Transfers**

It may sometimes be necessary to transfer personal information outside the UK as a result of our requirements for data hosting services. If we do this your personal information, will continue to be subject to appropriate safeguards as set out in Data Protection Legislation.

## **Links to other websites and use of digital platforms**

We will sometimes provide you with links to other websites, but these websites are not under our control. We will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. Therefore, we would advise you to consult the privacy policy and terms and conditions on each website to see how they may process your information.

In addition, when using other digital platforms such as Facebook and social networks, please remember it is your responsibility to set appropriate settings on your accounts so you are comfortable with how your information is used and shared on them.

## **Your rights**

### ***Access to your personal information***

You have the right to a copy of the personal information that we hold about you. This is often called a Subject Access Request (SAR), and there are limits to this right, such as where the disclosure of the information would unreasonably impact the data protection rights of a third party.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and information about your interactions with us so that we can locate your personal information. Your request can be submitted through our customer portals or it can be emailed to [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk) To find out how else you can contact us, please visit our website.

### ***Correction of your personal information***

If any of the personal information we hold about you is inaccurate or out of date, you can request that it be corrected or updated. Or you can amend it yourself by logging in to the customer portal and editing your records.

We rely on you and any third parties from which we source information about you to provide information that is correct, and to inform us as soon as possible of any changes that affect the accuracy of that information. It is particularly important that the contact details we have for you, and anyone that you have consented to us sharing information with about you, remain up to date.

### ***Right to object to our processing of your data***

If we rely on our legitimate interests as a basis for processing your personal data, you have the right to object to our continued use of that information, unless we can show that there is a compelling reason for the processing to continue or we are bringing or defending a legal claim.

### ***Right to erasure of your personal information***

You have the right to ask us to erase your personal information if:

- there is no longer a lawful reason for us to use it (including when you have withdrawn consent);
- our original purpose in processing that data no longer exists, and no other purpose has replaced it;
- you have objected to our processing of the information and there is no overriding legitimate interest for us to continue the processing; or
- the personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information in certain circumstances, including, when:

- we have an overriding legitimate interest in continuing to process it;
- we have to comply with a legal obligation that requires us to continue processing that information
- we need to do so as part of a task we are carrying out in the public interest; or
- we need the information as part of a legal claim that we are bringing or defending

### ***Right to data portability***

You have the right to receive and reuse your personal information which you have provided to us, for your own purposes across different services. This applies where the processing is based on your consent or for the performance of a contract and when processing is carried out by automated means.

### ***Right to restrict processing***

You can tell us that you do not wish us to process certain personal information related to you for example if you believe it is not accurate, or you feel it is unlawful or being used for a purpose different to what you were told we would use it for. You can also tell us that you do not wish us to process information relevant to your ethnic origin, sexuality, health or disabilities or religious beliefs for the purpose of monitoring equality of opportunity or treatment.

### ***Consent***

In some circumstances, your consent is the legal basis for us using your information.

Consent must be freely given by you for a specific purpose; we will always clearly explain why we need the information we have asked you for. Consent must be clearly given; so, we never assume your consent, or use pre-ticked boxes to communicate consent.

You have the right to change your mind at any time and withdraw your consent. The consequence might be that we can't do certain things for you. Consent can be withdrawn using our customer portal , by emailing [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk) or by writing to us at the address given below.

We always ask for the consent of a parent when we wish to share the data of any child (under 16) based on the provision of consent.

### **Contact us**

If you'd like to exercise any of these rights or have a question about this policy or the way your personal information is used, please contact our Data Protection Officer by one of the following means:

**By emailing:** [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk)

**Online:** through logging on to the customer portal

**By Phone:** via our **Customer Experience Service Centre:**

- for customers in Bristol, Somerset, Dorset and Devon: 01935 404 500

- for customers in all other locations: 0300 123 1567

**By Post:** Data Protection Officer, Abri Group Ltd., Lupin Way, Yeovil, Somerset BA21 8WN.

#### ***Lodge a Complaint via our Complaints team***

You can lodge a complaint about the handling of your personal data at any time by calling our Customer Service Centre on the phone numbers given above; or by emailing: [abridataprotection@abri.co.uk](mailto:abridataprotection@abri.co.uk).

#### ***Lodge a Complaint with the Supervisory Authority***

You have the right to lodge a complaint to the Information Commissioner's Office (UK's Supervisory Authority) go to [www.ico.org.uk](http://www.ico.org.uk) or ring 0303 123 1113 to find out more.

