

# calicohomes

## Privacy Notice

**Providing quality services that  
make a real difference to people's  
lives**

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## 1. Summary

Calico Homes Limited ("Calico"), a UK charitable social housing provider, is committed to protecting and respecting your privacy and complying with the principles of data protection. This policy sets out the basis on which any personal data we collect create or otherwise obtain from or about you will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are a Registered Social Housing Provider regulated by The Regulator of Social Housing (RSH) and normal activities can be summarised as:

- Providing social and other types of housing.
- Property and grounds maintenance and repair.
- Managing housing, tenancy/lease and account as landlords
- We also provide additional optional services including:
- Promoting, organising and assisting community events.
- Offering opportunities to be involved (co-regulation).
- Providing welfare, benefits and debt advice through moneywise.
- Adaptations made to the properties we manage.
- Buying, selling and letting of land and properties.

Our purpose is:

**'Providing quality services that make a real difference to people's lives'**

We want to help individuals of all ages and backgrounds, and their families, live peacefully and prosperously in warm, secure homes and safe friendly neighbourhoods.

We have a passion for making our customers' lives better.

## 2. Who We Are

The data controller is Calico Homes Limited of Centenary Court, Croft Street, Burnley BB11 2ED. We have appointed a Data Protection Officer (DPO) to oversee our processing of personal information whose contact details are provided below.

**Mrs A Thornley: Calico Homes Limited, Centenary Court, Croft Street, Burnley BB11 2ED**

**Telephone: 0800 169 2407**

### Other Parts of 'The Calico Group'

#### The Calico Group

We are part of The Calico Group, which is made up of innovative businesses and charities, working together to make social profit, rather than financial profit, the driving force behind a wide range of high quality services. We do this by understanding the community's needs and harnessing the widest possible range of expertise; combining our growing range of complementary services to create innovative, new opportunities for the benefit of the community. The Group is made up of the following companies:

#### Ring Stones Maintenance and Construction LLP

They aim to make a difference to the quality of life of individuals and the wider communities in which they work. They assist and contribute to providing accommodation for families and older people, as well as supported housing and services for homeless people and community developments. Ring Stones undertake contract work for a variety of clients across the North, providing an all-round management delivery model and the full range of contractor services. They have a wide range of experience in sourcing funding for and delivering retrofit schemes, helping their clients to achieve significant ECO or Green Deal funding to support social and private households.

#### Delphi Medical Ltd

Delphi Medical is a leading independent provider of drug and alcohol treatment in the UK. They focus on ensuring excellent clinical and psychosocial provision as part of an integrated recovery pathway, which supports and facilitates patients to engage in genuine recovery. Their areas of expertise include Community Drug and Alcohol Treatment, Offender Health, Inpatient Detoxification Services, Clinical Systems and Training.

#### Acorn Recovery Projects

Acorn Recovery Projects is a registered charity set up to help individuals struggling with addiction and de-motivational issues to find and live a Life worth Living. By providing innovative recovery services, Acorn Recovery Projects enables individuals and their

families to break free from drug, alcohol and other addictions. They do this by helping their clients find substance, emotional, social and lifelong recovery.

### **Calico Enterprise**

Calico Enterprise works with a host of organisations to deliver a range of services across the North West that: provide housing-related support; tackle worklessness; and give information and advice. Such services include: Calico Interiors; Constructing the Future; Calico Careers; and Floating Support contracts.

We define "social profit" as the positive difference we make to people's lives, across all the communities in which we work. We create social profit by developing innovative services and harnessing the opportunities of our unique group structure.

### **3. What information we collect about you**

The information we require from you, the tenant(s) or leaseholder(s), includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf, if applicable.
- Basic details (name and date of birth) 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).
- Proof of housing eligibility, any interest or equity in other property.
- Other personal information that will vary on a case by case basis to help us investigate breach of tenancy, alleged anti-social behaviour or fraud.
- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances.
- Financial information. We may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills or apply for funding on your behalf.
- Health and other information relating to your circumstances may be required to support a grant application or funding for improvements or adaptations made to the property you are living in. More specific details are provided if you use these services.
- Next of Kin or Emergency Contact Information you provide to be used in case of emergency. You should only provide this information where you know the specified person(s) is/are happy to act as your emergency contact and could expect Calico Homes to contact them about you.
- Other special category information for statistical reporting and analysis purposes including complying with equality legislation.
- Photo ID, bank statements, payslips or income details when we require this information for processing a house sale, purchase or let.

If you do not provide the above information as required, we may not be able to provide all our services to you, and ultimately may result in you not being able to hold a tenancy or lease with us, or sell, purchase or let a property through us.

### **4. Special Categories of Personal Data**

We may also collect from you special categories of personal data which includes information about you relating to race, ethnic origin, political opinion, religious beliefs, trade union membership, biometric data and genetic data, sex life and sexual orientation, health and criminal convictions and offences. Due to the sensitive nature of these category of data, any processing is afforded more protection under data regulations. If we do process your special category of personal data, we will ensure that the relevant conditions under the GDPR and DPA 2018 are met.

### **5. How we collect your information**

We aim to process information about you fairly, lawfully, and in a transparent manner. The aim of this document is to provide you with sufficient information for you to be able to understand what we are doing with your data. If you are unsure how we are handling information about you or you think we could improve our privacy information, please let us know.

Calico Homes collects information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms or respond to a survey, also when you call, write, e-mail or meet with us. Additionally, we may collect information when you use our social media sites, websites or the tenant portal.

Our landline phone calls are recorded for training and monitoring purposes and are usually held for a period of six months. Notes may be made in our CRM (Customer Relations Management) system about conversations that take place.

We operate a CCTV system at our office premises for the detection and prevention of crime. It operates continuously, and recordings are held for one month.

From time to time we may operate CCTV / sound recording and / or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime.

We take photographs at our properties, events and in our communities to use for record keeping, marketing and publicity. Photographs of individuals will only be used for marketing and publicity with the individuals consent.

We may also receive information about you from third parties including:

- Your council or benefits officer relating to your housing.
- Previous landlords and credit agencies when you apply for housing.
- Police, welfare or support organisations dealing with you.
- Councillors, MPs or other representatives acting on your behalf/instruction.
- Financial institutions when you apply for our services.

## 6. Withdrawing Consent

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of any processing based on consent before it was withdrawn. At the time of giving consent, we will provide you with information on how to withdraw your consent. If you want more information about this, please contact us at [dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk).

## 7. Legal basis for processing your personal data

Data protection regulations requires us to have lawful basis for processing your personal data. These include:

- **Contractual obligation:** the processing is necessary for the performance of a contract we have with you, or because you have asked us to take specific steps before entering into a contract. We rely on the contract performance basis in order to take steps to enter into the rental contract with you and supply the goods and products, to service the contract and to enforce our rights and remedies under the contract.
- **Legal Obligation:** the processing is necessary for us to comply with the law (not including contractual obligations). We will collect information necessary for us to maintain records as required by government and regulatory bodies.
- **Legitimate interests:** the processing is necessary for our legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.
- **Consent:** You have given clear consent for us to process your personal data for a specific purpose.
- **Vital Interests:** the processing is necessary for the protection of life.

## 8. How we process your information

The information we require from you is used to manage your tenancy, leasehold agreement or other contract between you and Calico Homes. Please read your contract carefully for specific details as 'performance of a contract' is usually the legal basis for processing your information and carrying out our activities.

The processing activities we conduct can be summarised as:

- Managing your account charges and payments, including arrears.
- Managing the repairs, maintenance and adaptations of our properties.

- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.
- Complying with relevant legislation and regulation.

Warning and vulnerability information may be processed as part of any function we legitimately perform for safeguarding of our workforce, including contractors.

Calico Homes conducts research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

Calico Homes conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Calico Homes operates a range of information, communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

## **9. Who we share data with and how long we keep information**

Normally, only our employees will be able to see and process your personal information. However, there may be times when we will share relevant information with third parties as part of performance of the contract with you, or where we are legally required to do so. When sharing personal information, we will comply with all aspects of the Act and the Regulation.

Special category of personal data such as information about health, sexual life, race and religion for example, are subject to particularly stringent security and confidentiality measures.

Where necessary or required, we may share your personal information as follows:

- With our contractors, to undertake some repairs, maintenance or improvement works on our properties;
- With third party service providers such as solicitors, agents, mortgage brokers, financial advisors, surveyors and valuers relating to a property sale, in connection with services performed on our behalf;
- Our relationships with such providers are governed by our contracts with them which include strict adherence to data sharing and confidentiality protocols. Our contractors are required to comply with the law and our own Data Processing Agreements to ensure data is appropriately managed for specified purposes, including running our out-of-hours telephone service or to complete emergency, responsive or planned property repairs and improvements;
- With other registered providers, trusts and landlords, in connection with tenancy references and associated enquiries;
- With a language translation service if it is necessary to translate any information into or from a foreign language for you;
- With community partners in connection with the delivery of co-ordinated local services;
- With utility companies (and their representatives) and Council Tax Offices, to ensure billing details are correct;
- With credit reference agencies and debt collection agencies, in connection with some housing applications and in relation to any outstanding charges;
- With local authorities and government departments, as necessary for administering justice, or for exercising statutory, governmental, or other public functions;
- With police and other relevant authorities (e.g. Probation Service, Department of Work and Pensions, HM Revenues and Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty;
- With other statutory organisations, e.g. social services and health authorities, as necessary for exercising statutory functions;

- With our regulator, the Regulator of Social Housing (RSH), to comply with our regulatory obligations.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life or death situation).

### 10. Children's information

Calico Homes does not normally process children's information as part of a tenancy as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

### 11. International transfer of your personal data

We do not envisage transferring any information about or relating to you to anyone who is located outside of the European Economic Area other than as indicated above and we have a commitment from our business partners and data processors that they too will honour this commitment. We will not transfer or store your personal information outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

### 12. Your rights regarding your personal information

Data protection regulations have conferred certain rights on you as the data subject regarding your personal data which we hold. These rights include:

- **Right to be informed** about the collection and use of your personal information. This is called 'privacy information'. We are required by data protection regulations to provide you with information regarding the purposes for processing your personal information, the retention period and who it will be shared with. This Privacy Policy serves that purpose.
- **Right of access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Right of rectification** – This enables you to have any incomplete or inaccurate information we hold about you to be corrected.
- **Right to erasure – (also known as right to be forgotten)** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Right to Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In some cases, we may be able to continue processing if you can show that you have a compelling reason for doing so. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Please note that some of these rights are not absolute and can only apply in certain circumstances. For more information on your rights, visit the ICO website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of these rights, please write to us at [dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk), we will always endeavour to answer your questions as part of our normal friendly, helpful service. To advise of any changes or corrections, please contact our Customer Services team on 0800 169 2407 or 01282 686 300 or via e-mail to [contact@calio.org.uk](mailto:contact@calio.org.uk).

### **13. Complaints**

You have the right to complain about any matter relating to our service, including how we use your personal information. In the first instance please contact our Customer Services team on 0800 169 2407 or 01282 686 300 or e-mail [contact@calio.org.uk](mailto:contact@calio.org.uk) to raise a complaint. If you are still not happy with our service, you may complain to the Housing Ombudsman Service at <http://www.housing-ombudsman.org.uk/>. If you wish to complain about our use of your personal information, please contact the supervisory authority, Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk). Our ICO registration number is **Z4571092**.

### **14. How long we will keep your data for**

Information relating to a tenancy or lease agreement will be kept for as long as the agreement is active or where money is owed on the account, and for a period not exceeding six years afterwards in line with our Data Retention Policy. In addition, basic history of who held a tenancy, at which property, and when will be held forever.

### **15. How we will communicate with you**

Calico Homes needs to communicate with its customers and this will usually be in writing or by telephone but is more commonly becoming electronic and paperless. We are moving many of our services on-line as this is usually more convenient for you and more efficient for us.

If you use our secure online tenant's portal, it is important that you keep your password secure and do not share your details with any other person. The privacy of your information, as with any online service, depends on you keeping your account username and password details to yourself, as well as setting a suitably complex password that cannot be guessed. In the case of a joint tenancy, both parties have their own login details.

### **16. Marketing**

We will not send individuals unsolicited direct marketing material without their consent. However, we may conduct business to business marketing campaigns. Our tenants will receive our newsletter 'Bolt' with information about what is going on within the organisation and in our communities. We are required by our regulator to keep our tenants informed and to offer opportunities for involvement. Should you choose to opt-out of this service, you can do so by contacting us via email at: [contact@calio.org.uk](mailto:contact@calio.org.uk) to update your preferences.

Our tenants may receive promotional material about community events that relate to them or which are taking part in their local community, to opt-out please contact us via email to: [contact@calio.org.uk](mailto:contact@calio.org.uk) to update your preferences.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised (temporarily or permanently) by you. Authorisation of a temporary person can be done verbally over the phone, however to nominate someone permanently you must contact us via email at [contact@calio.org.uk](mailto:contact@calio.org.uk)

We will not sell individuals personal information on to third parties. We will not pass on your personal information to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do so.

### **17. Additional voluntary services**

Calico Homes conducts a number of additional voluntary services including organising community events, providing debt advice, adapting the property you live in, selling and letting properties and gathering information to improve our services.

For these voluntary services, where your personal information is needed, and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

For the additional services, much of the information contained in our Privacy Notice is still relevant, such as details about Calico Homes as the Data Controller, contact information for the Data Protection Officer and the rights you have under the legislation, including the right to withdraw your consent and the right to complain.

### **18. Further information**

Calico Homes produces a number of different leaflets designed to inform you about our services and other useful topics. There is a leaflet 'Have Your Say' for complaints, compliments and suggestions available on our website <https://calicohomes.org.uk/comments-and-complaints/>

For further information about Calico Homes, please see our website at <https://calicohomes.org.uk/> (including website terms & conditions and information about website cookies) or contact our Customer Services team.

### **19. Changes to our Privacy Policy**

This privacy notice was last updated in May 2018 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time. The latest full version is always available from our website at <https://calicohomes.org.uk/>