



Wigan & Leigh Homes Privacy Notice

Wigan & Leigh Homes (“a data controller”) is committed to protecting the privacy and security of your personal information.

This privacy notice explains how we use and will use your personal information and tells you about your privacy rights and how the law protects you in accordance with the General Data Protection Regulations (GDPR). Wigan & Leigh Homes owns 80 properties across the borough. This notice relates to the application process for accommodation, the management of the stock including tenancy/leasehold management; rent and arrears: adaptations, repairs and maintenance; and tenant involvement.

This notice provides additional privacy information for:

- Housing register applicants
- Current Wigan & Leigh Homes tenants
- Former Wigan & Leigh Homes tenants
- Leaseholders living in former Wigan & Leigh Homes properties
- Complainants regarding Wigan & Leigh Homes tenants
- Attendees at housing meetings, functions and events

It describes how we collect, use and share personal information about you:

- Before, during and after your relationship with us ends and
- The types of personal information we need to process, including information the law describes as ‘special because of its sensitivity’.

It is important that you read this notice, together with any other privacy information so that you are aware of how and why we use your personal information.

We collect Special Information;

The law treats some types of personal information as ‘special’ because the information requires more protection due to its sensitivity. This information consists of:

- Racial or ethnic origin
- Sexuality and sexual life
- Religious or philosophical beliefs
- Trade Union membership
- Political opinions
- Genetic and bio-metric data
- Physical or mental health
- Criminal convictions and offences

Purpose(s)

The main purposes for processing your personal information are:

- To provide advice on housing options available to you
- To enable us to provide you with accommodation
- To provide advice about services to meet your needs
- Managing your account charges and payments including arrears and welfare advice
- Managing the repairs, maintenance and adaptations of our properties
- To enable us to meet our statutory and legal duties relating to social housing and homelessness
- To ensure that tenancy conditions are complied with such as dealing with anti-social behaviour or fraud
- We also conduct research and analysis to help improve services and evaluate performance. Where possible this is anonymised.
- We also conduct surveys in relation to services in order to gauge satisfaction and improve services.
- To assess your suitability to become a Tenant Panel Member.

Categories of personal data

In order to carry out activities and obligations as a registered social landlord, we process personal information in relation to:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Personal demographics for applicants and tenants(including date of birth, gender, marital status, civil partnerships)
- Contact details such as names, addresses, personal e-mail address, telephone numbers
- Bank account details, payroll and tax/national insurance status information.

Special Categories

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation opinions (including ensuring meaningful equal opportunities monitoring and reporting)
- Information about your health
- Financial information
- Offences (including alleged offences), criminal proceedings, outcomes and sentences

The legal bases we rely on for processing your personal information are:

- you have entered into a contract with us.
- it is required by law (such as where this is mandated by statute or under a court order)
- it is necessary to perform statutory functions (including law enforcement functions)
- it is necessary to protect you or others from harm (e.g. in an emergency or civil disaster).
- our legitimate interests (or those of a third party) provided your interests and fundamental rights do not override those interests;

- fraud prevention and protection of public funds

If we intend to use your information beyond legal obligations or to exercise specific rights, we will seek your consent to process your information and full guidance will be provided.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

All the decisions we make about you involve human intervention with the exception of allocation of points in relation to your application for housing which is generated from the information you submit.

COOKIES

To find out how we use cookies please [see our cookie notice](#).

DATA SHARING

We may be obligated in certain circumstances to share your data with third parties, including third-party service providers and other partner agencies. These third parties will also be required to comply with the provisions of the General Data Protection Regulations. (GDPR)

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other partner agencies.

How secure is my information with third-party service providers and other entities?

All our third-party service providers and other entities are required to take appropriate security measures to protect your personal information in the same way that we are.

When might you share my personal information with other entities?

We will share your personal information with other entities as part of our regular reporting activities on company performance, in the context of a business reorganisation or departmental restructuring exercise, for system maintenance support and hosting of data.

In addition to these general reasons for information sharing, we also collect or receive information from external parties such as:

- Police
- Adult Social Care
- Children's social care
- Probation
- Health and social care organisations
- Fire and Rescue Service
- Registered Social Landlords
- Voluntary organisations
- Other local authorities
- Building and maintenance contractors
- Council Tax
- Housing Benefits
- Department for Work and Pensions

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost or alteration, inappropriate access, misuse or theft.

As well as technical, physical and organisational controls, we recognise that a well- trained, informed and security alert workforce minimises privacy risks from human error and/or threats from malicious parties.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner of a suspected breach within 72 hours to comply with our legal obligations.

DATA RETENTION

We will only keep your personal information for as long as the law specifies or as determined by business requirements. Details of retention periods for different aspects of your personal information are available in our corporate records management policy.

We must continue to retain necessary information in accordance with our corporate records policy to fulfil legal, statutory and regulatory requirements.

RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It is important that the personal information we hold about you are accurate and current. Please keep us informed if your personal information changes.

YOUR RIGHTS AT ANY TIME - YOUR PERSONAL INFORMATION

- **Enhanced Access** - You have the right to request information about the data that we hold about you and what we do with it.
- **Rectification**- You have the right to have personal data corrected if it is inaccurate and, considering the purposes of the processing, the right to have incomplete personal data completed.
- **Erasure** – You have an enhanced right to request that we erase your personal data in certain circumstances.
- **Restrict processing** – You will also have the right to request that we restrict the processing of your personal data in certain circumstances such as you require us to

retain your information for the establishment, exercise or defence of your own legal rights.

- **Data portability** - You have the right to receive personal information that you have provided to us in a structured, machine-readable form and to have us transmit the personal information to another organisation where technically feasible.
- **Object**- You have the right to object to us processing your personal information.
- **Automated decision-making**, including profiling – You have the right to request that a decision which legally affects you is reviewed by an appropriate officer.

To review, verify, correct or request deletion of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact homesGDPR@wigan.gov.uk in writing. We are happy to clarify any aspect of this notice with you. The company will respond to any such request within one month from receipt.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is in our view unreasonable or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

RIGHT TO WITHDRAW CONSENT AT ANYTIME

Where the legal reason for processing your personal information is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of our processing prior to the withdrawal of your consent.

If you do not provide consent, we may not be able to perform the contract we have entered into with you to allocate you accommodation, or we may be prevented from complying with our legal obligations such as assessing your housing need or manage your tenancy.

If you wish to withdraw consent, you can e-mail homesGDPR@wigan.gov.uk

YOUR RIGHTS

In addition to the above, you have legal rights in relation to your personal information.

You have a right to be informed about how and why your personal information is being processed. This notice fulfils that obligation.

To ask for access to your information, you should e-mail homesGDPR@wigan.gov.uk

DATA PROTECTION OFFICER

If you wish to raise a concern or seek clarification about any aspect of this notice, please contact our [Data Protection Officer](#). Please provide documents to prove your identity along with a description of your concern.

We will respond to all requests within one month.

If you are unhappy with the way that we handle your concern you may complain to the [Information Commissioners Office \(ICO\)](#) at:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

The Information Commissioners Office deals with concerns and complaints relating to data protection (GDPR) and freedom of information legislation.

CHANGES TO THIS PRIVACY NOTICE

We may update or revise this privacy notice at any time so please refer to the version published on our website for the most up to date details.