



PRIVACY POLICY	
Policy Number	GCS-2.16 Version 2.0
Prepared by	Clare Ruxton, Director of Corporate Services
Date of Review	October 2022
Date of Next Review	October 2025
Reviewed & Approved by	Corporate Service Committee

OSPREY GROUP PRIVACY POLICY POLICY STATEMENT

Osprey Housing believe that effective and efficient management of data is vital to the success of maintaining good quality services for all our tenants and provide value for money.

We embrace robust data management, and this is encompassed in our Core Values:

- **Ambition and Achievement** – we are a high performing organisation delivering through innovation and challenge
- **Equality and Respect** – we recognise and celebrate the unique value in everyone
- **Quality and Professionalism** – we strive to deliver high standards
- **Agile and Responsive** – we are flexible and quick to deal with change without diminishing our delivery

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1. Introduction

Osprey Housing is committed to ensuring the secure and safe management of data held in relation to customers, staff and other individuals. Osprey's staff members have a responsibility to ensure compliance with the terms of this policy, and to manage individuals' data in accordance with the procedures outlined in this policy and documentation referred to herein.

Osprey needs to gather and use certain information about individuals. These can include customers (tenants, factored owners etc.), employees and other individuals that Osprey has a relationship with. Osprey manages a significant amount of data, from a variety of sources. This data contains Personal Data and Sensitive Personal Data (known as Special Categories of Personal Data under the GDPR).

This Policy sets out Osprey's duties in processing that data, and the purpose of this Policy is to set out the procedures for the management of such data.

2. Legislation

It is a legal requirement that Osprey process data correctly; Osprey must collect, handle and store personal information in accordance with the relevant legislation.

The relevant legislation in relation to the processing of data is:

- the UK General Data Protection Regulation ("the GDPR");
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications);
- the Data Protection Act 2018 ("the 2018 Act") and
- any legislation that, in respect of the United Kingdom, replaces, or enacts into United Kingdom domestic law, the UK General Data Protection Regulation, the proposed Regulation on Privacy and Electronic Communications or any other law relating to data protection, the processing of personal data and privacy as a consequence of the United Kingdom leaving the European Union.

3. Data

Osprey holds a variety of Data relating to individuals, including customers and employees (also referred to as data subjects) which is known as Personal Data. The Personal Data held and processed by Osprey is detailed within the Fair Processing Notice in Appendix 3 and the Data Protection Addendum of the Terms and Conditions of Employment which has been provided to all employees.

"Personal Data" is that from which a living individual can be identified either by that data alone, or in conjunction with other data held by Osprey.

Osprey also holds Personal data that is sensitive in nature (i.e. relates to or reveals a data subject's racial or ethnic origin, religious beliefs, political opinions, relates to health or sexual orientation). This is "Special Category Personal Data" or "Sensitive Personal Data".

4. Processing of Personal Data

4.1 Osprey is permitted to process Personal Data on behalf of data subjects provided it is doing so on one of the following grounds:

- Processing with the consent of the data subject (see clause 4.4 hereof);
- Processing is necessary for the performance of a contract between Osprey and the data subject or for entering into a contract with the data subject;
- Processing is necessary for Osprey's compliance with a legal obligation;
- Processing is necessary to protect the vital interests of the data subject or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of Osprey's official authority; or
- Processing is necessary for the purposes of legitimate interests.

4.2 Fair Processing Notice

Osprey has produced a Fair Processing Notice (FPN) which it is required to provide to all customers whose Personal data is held by Osprey. The FPN must be provided to the customer from the outset of processing their Personal Data and they should be advised of the terms of the FPN when it is provided to them.

The Fair Processing Notice for Tenants at Appendix 3 sets out the Personal Data processed by Osprey and the basis for that Processing. This document is provided to all of Osprey's customers at the outset of processing their data.

4.3 Employees

Employee Personal data and, where applicable, Special Category Personal Data or Sensitive Personal Data, is held and processed by Osprey. Details of the data held and processing of that data is contained within the Employee Fair Processing Notice which is provided to Employees at the same time as their Contract of Employment. Available in Appendix 4.

A copy of any employee's Personal Data held by Osprey is available upon written request by that employee to Osprey's Corporate Services Team.

4.4 Consent

Consent as a grounds for processing will require to be used from time to time by Osprey when processing Personal Data. It should be used by Osprey where no other alternative grounds for processing is available. In the event that Osprey requires to obtain consent to process a data subject's Personal Data, it

shall obtain that consent in writing. The consent provided by the data subject must be freely given and the data subject will be required to sign a relevant consent form if willing to consent. Any consent to be obtained by Osprey must be for a specific and defined purpose (i.e. general consent cannot be sought).

4.5 Processing of Special Category Personal Data or Sensitive Personal Data

In the event that Osprey processes Special Category Personal Data or Sensitive Personal Data, Osprey must do so in accordance with one of the following grounds of processing:

- The data subject has given explicit consent to the processing of this data for a specified purpose;
- Processing is necessary for carrying out obligations or exercising rights related to employment or social security;
- Processing is necessary to protect the vital interest of the data subject or, if the data subject is incapable of giving consent, the vital interests of another person;
- Processing is necessary for the establishment, exercise or defence of legal claims, or whenever court are acting in their judicial capacity; and
- Processing is necessary for reasons of substantial public interest.

For further information on this consult Data Handling Procedure GCS 2.16.4.

5. Data Sharing

Osprey shares its data with various third parties for numerous reasons in order that its day to day activities are carried out in accordance with Osprey's relevant policies and procedures. In order that Osprey can monitor compliance by these third parties with Data Protection laws, Osprey will require the third party organisations to enter in to an Agreement with Osprey governing the processing of data, security measures to be implemented and responsibility for breaches.

Personal data is from time to time shared amongst Osprey and third parties who require to process personal data that Osprey process as well. Both Osprey and the third party will be processing that data in their individual capacities as data controllers.

Where Osprey shares in the processing of personal data with a third party organisation (e.g. for processing of the employees' pension), it shall require the third party organisation to enter in to a Data Sharing Agreement with Osprey.

5.1 Data Processors

A data processor is a third party entity that processes personal data on behalf of Osprey, and are frequently engaged if certain of Osprey's work is outsourced (e.g. payroll, maintenance and repair works).

- A data processor must comply with Data Protection laws. Osprey's data processors must ensure they have appropriate technical security measures in place, maintain records of processing activities and notify Osprey if a data breach is suffered.
- If a data processor wishes to sub-contact their processing, prior written consent of Osprey must be obtained. Upon a sub-contracting of processing, the data processor will be liable in full for the data protection breaches of their sub-contractors.
- Where Osprey contracts with a third party to process personal data held by Osprey, it shall require the third party to enter in to a Data Protection Addendum with Osprey.

For further information on this consult Data Sharing Procedure GCS 2.16.5.

6. Data Storage and Security

All Personal Data held by Osprey must be stored securely, whether electronically or in paper format.

6.1 Paper Storage

If Personal Data is stored on paper it should be kept in a secure place where unauthorised personnel cannot access it. Employees should make sure that no Personal Data is left where unauthorised personnel can access it. When the Personal Data is no longer required it must be disposed of by the employee so as to ensure its destruction. If the Personal Data requires to be retained on a physical file then the employee should ensure that it is affixed to the file which is then stored in accordance with Osprey's storage provisions.

6.2 Electronic Storage

Personal Data stored electronically must also be protected from unauthorised use and access. Personal Data should be password protected when being sent internally or externally to Osprey's data processors or those with whom Osprey has entered in to a Data Sharing Agreement. If Personal data is stored on removable media (CD, DVD, USB memory stick) then that removable media must be stored securely at all times when not being used. Personal Data should not be saved directly to mobile devices and should be stored on designated drives and servers.

For more information see Records Management Policy GCS 2.24.

7. Breaches

A data breach can occur at any point when handling Personal Data and Osprey has reporting duties in the event of a data breach or potential breach occurring. Breaches which pose a risk to the rights and freedoms of the data subjects who

are subject of the breach require to be reported externally in accordance with the below.

7.1 Internal Reporting

Osprey takes the security of data very seriously and in the unlikely event of a breach will take the following steps:

- As soon as the breach or potential breach has occurred, and in any event no later than six (6) hours after it has occurred, the DPO and the CSM must be notified in writing of (i) the breach; (ii) how it occurred; and (iii) what the likely impact of that breach is on any data subject(s);
- Osprey must seek to contain the breach by whatever means available;
- The DPO and the CSM must consider whether the breach is one which requires to be reported to the ICO and data subjects affected and do so in accordance with clause 7;
- Notify third parties in accordance with the terms of any applicable Data Sharing Agreements.

For more information on this see Personal Data Breach Procedure GCS 2.16.2.

7.2 Reporting to the ICO

The Data Protection Officer and/or the Corporate Services Manager (CSM) will report any breaches which pose a risk to the rights and freedoms of the data subjects who are subject of the breach to the Information Commissioner's Office ('ICO') within 72 hours of the breach occurring. The DPO and the CSM must also consider whether it is appropriate to notify those data subjects affected by the breach.

8. Data Protection Officer ('DPO')

The Data Protection Officer is an individual who has an overarching oversight of Osprey's compliance with the Data Protection laws. The details of Osprey's DPO are noted on our website and contained within the Fair Processing notice.

In partnership with the Corporate Services Manager, the DPO will be responsible for:

- Monitoring Osprey's compliance with Data Protection laws and this policy;
- Cooperating with and serving as Osprey's contact for the ICO;
- Reporting breaches or suspected breaches to the IOC and data subject as appropriate.

9. Data Subject Rights

Certain rights are provided to data subjects under the GDPR. Data Subjects are entitled to view the personal data held about them by Osprey, whether in written or electronic form.

Data subjects have a right to request a restriction of processing their data, a right to be forgotten and a right to object to Osprey's processing of their data. These rights are notified to Osprey's tenants and other customers in Osprey's Fair Processing Notice.

9.1 **Subject Access Requests**

Data Subjects are permitted to view their data held by Osprey upon making a request to do so (a Subject Access Request). Upon receipt of a request by a data subject, Osprey must respond to the Subject Access Request within one month of the date of receipt of the request. Osprey:

- must provide the data subject with an electronic or hard copy of the personal data requested, unless any exemption to the provision of that data applies in law.
- where the personal data comprises data relating to other data subjects, must take reasonable steps to obtain consent from those data subjects to the disclosure of that personal data to the data subject who has made the Subject Access Request, or
- where Osprey does not hold the personal data sought by the data subject, must confirm that it does not hold any personal data sought to the data subject as soon as practicably possible, and in any event, not later than one month from the date on which the request was made.

For more information on this consult Subject Access Request Procedure GCS 2.16.1

9.2 **The Right to be Forgotten**

A data subject can exercise their right to be forgotten by submitting a request in writing to Osprey seeking that Osprey erase the data subject's Personal Data in its entirety.

- Each request received by Osprey will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The CSM will have responsibility for accepting or refusing the data subject's request and will respond in writing to the request.

9.3 **The Right to Restrict or Object to Processing**

A data subject may request that Osprey restrict its processing of the data subject's Personal Data, or object to the processing of that data. In the event that any direct marketing is undertaken from time to time by Osprey, a data subject has an absolute right to object to processing of this nature by Osprey,

and if Osprey receives a written request to cease processing for this purpose, then it must do so immediately.

Each request received by Osprey will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The CSM will have responsibility for accepting or refusing the data subject's request and will respond in writing to the request.

10. Privacy Impact Assessments ('PIAs')

These are a means of assisting Osprey in identifying and reducing the risks that our operations have on personal privacy of data subjects.

Osprey shall:

- Carry out a PIA before undertaking a project or processing activity which poses a "high risk" to an individual's privacy. High risk can include, but is not limited to, activities using information relating to health or race, or the implementation of a new IT system for storing and accessing Personal Data; and
- In carrying out a PIA, include a description of the processing activity, its purpose, an assessment of the need for the processing, a summary of the risks identified and the measures that it will take to reduce those risks, and details of any security measures that require to be taken to protect the personal data.

Osprey will require to consult the ICO in the event that a PIA identifies a high level of risk which cannot be reduced. The DCS will be responsible for such reporting, and where a high level of risk is identified by those carrying out the PIA they require to notify the CSM within five (5) working days.

For more information on this consult Data Privacy Impact Assessment Procedure GCS 2.16.3.

11. Archiving, Retention and Destruction of Data

Osprey cannot store and retain Personal Data indefinitely. It must ensure that Personal data is only retained for the period necessary. Osprey shall ensure that all Personal data is archived and destroyed in accordance with the periods specified within the table at Appendix 1.

12. Equality & Diversity

It is Osprey's policy to ensure equality of opportunity for all workers and job applicants. All individuals will be treated fairly regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex

and sexual orientation. Osprey adopts a zero tolerance stance towards all forms of unlawful discrimination, harassment and victimisation.

In this regard, Osprey acknowledges the protected characteristics and types of unlawful behaviour defined within the Equality Act 2010. As a minimum, Osprey aims to ensure compliance with the legislative provisions at all times.

13. Monitoring & Reporting

Osprey will monitor this policy in conjunction with our other policies and procedures to ensure that it is being adhered to. Key data protection performance indicators (KPIs) have been agreed and will be reported through the Corporate Services Committee in every governance cycle.

14. Review

This policy will be reviewed every 3 years unless the following criteria dictate that it would be best practise to review sooner:

- i. applicable legislation, rules, regulations and guidance, both those which affect Osprey directly and those which affect the resources available to significant numbers of our customers to enable them to sustain tenancies.
- ii. changes in the organisation.
- iii. continued best practice.

Appendix 1 Data Retention Periods

The table below sets out retention periods for Personal Data held and processed by Osprey Housing Group. It is intended to be used as a guide only. Osprey recognises that not all Personal Data can be processed and retained for the same duration, and retention will depend on the individual circumstances relative to the Data Subject whose Personal Data is stored.

Area	Type of Record	Suggested Retention Time
Governance	Board Membership Records and Documents	5 years after cessation of membership
Governance	Board Meeting Minutes	Permanently
Governance	Board Meetings Agendas, Reports and Papers	25 years
Governance	Management Team Meeting notes	10 years
Corporate Services	Complaints	5 years after closure
Corporate Services	Insurance Claims	3 years after event
Corporate Services	Employers Liability Certificate	40 years
Corporate Services	Press Enquiries and Releases	3 years
Finance	Bank Reconciliations	2 years
Finance	Outturn	10 years
Finance	Capital	7 years
Finance	Write-offs	7 years
Finance	Budget Working Papers	4 years
Finance	Grant Funding	10 years after end
Finance	General Records	7 years

Finance	Allpay Statements	7 years
Finance	VAT Records	7 years
Finance/HR	Payroll - Wages/salary records, expenses, bonuses	7 years after the end of the tax year they relate to
Finance/HR	Income tax, NI returns, correspondence with tax office	At least 3 years after the end of the tax year they relate to
Finance/HR	Retirement benefits schemes – notifiable events, e.g. relating to incapacity	6 years from end of the scheme year in which the event took place
Finance/HR	Pensioners records	12 years after the benefit ceases
Finance/HR	Statutory Sick Pay records, calculations, certificates, self-certificates	3 years
Finance/HR	Statutory maternity/paternity and adoption pay records, calculations, certificates (MAT 1Bs) or other medical evidence	3 years after the end of the tax year to which they relate
HR	Personnel Files	7 years from termination
HR	Documents proving the right to work in the UK	2 years after employment ceases
HR	Facts relating to redundancies	6 years if less than 20 redundancies 12 years if 20 or more redundancies
HR	Parental Leave Records	18 years
HR	Working Time/Annual Leave Records	2 years from the date they were made
HR	Health records	3 years after termination if reason for termination is connected to health
H&S	Accident books and records and reports of accidents	3 years after the date of the last entry

H&S	Health and Safety Committee Minutes and Records of consultations with Safety Representatives and Committee	Permanently
H&S	Fire Certificates	3 years
H&S	Risk Assessments	5 years
H&S	H&S Training Records	3 years
H&S	Asbestos – plans, risk assessments	5 years
H&S	Asbestos – Health Records	40 years
H&S	HSE Correspondence	5 years
Asset	Property Files – Commercial Leases	3 years
Asset	Property Files – Repairs Documents	5 years
Asset	Gas Servicing Contracts	3 years after contract end
Asset	Gas Servicing CP12 Certificate	2 years
Asset	Electrical Wiring Certificate	2 years
Asset	Asset Valuations	10 years
Asset	Contractor Lists	2 years
Asset	Unsuccessful applications to Contractor lists	1 year
Asset	Contractors’ H&S Plans	5 years
Asset	Waste Transfer Notes	3 years
Asset	Land and Building Conveyances	12 years
Asset	Bills of Quantities	3 years after contract end
Asset	Clerk of Works Files	5 years after contract end
Asset	Contaminated land – Remediation notice	16 years
Asset	Documents relating to successful Tenders	5 years after contract end
Asset	Documents relating to unsuccessful Tenders	5 years after notification

Housing	Applicants for Accommodation	5 years
Housing	Housing Benefits Notifications	Duration of tenancy
Housing	Tenancy files	5 years after termination of tenancy
Housing	Third Party documents re care plans	Duration of tenancy
Housing	Records re offenders. Ex-offenders (sex offender register)	Duration of tenancy
Housing	Lease documents	5 years after lease termination
Housing	ASB case files	5 years/end of legal action
Housing	Rent Payments	7 years
Housing	Minute of factoring meetings	Duration of appointment

Appendix 2 Data Mapping

Housing Data Map

Subject	Category of Data Subject	Category of Personal Data held	Core Data	Purpose of Processing	Lawful Basis for Processing	Security Controls	Held by who?	Held where?	Who has access?	Names of third party countries or internat orgs that personal data is transferred to
Personal details	Tenant	Contact details Financial details Personal details	Personal data in relation to current housing circumstances	Potential Customers	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access Controlled	Housing team	Void control folder on Sharepoint.	Customer Services, Housing Services and Asset teams	N/A
Personal details	Tenant	Contact details Financial details Personal details	Personal data in relation to Housing Needs Assessment at allocation, current household information for each member - DOB, NI, full name. Benefit entitlements, ASB case data, social work	Legal requirements to fulfil SST and protect organisation	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Locked filing cabinets with restricted access	Housing team. Key held by Customer Services team.	Locked cabinet in office	Customer Services, Housing Services and Asset teams	N/A

			involvement or their relevant supports. Police reports and multi agency meeting minutes. Copy of signed SST							
Personal details	Tenant	Contact details Financial details Personal details	Personal data in relation to Housing Needs Assessment at allocation, current household information for each member - DOB, NI, full name. Benefit entitlements, ASB case data, social work involvement or their relevant supports. Police reports and multi agency meeting minutes. Copy of signed SST	Data required to effectively manage tenancy and offer tenant support. Also for fulfilling all landlord duties and to protect the organisation in the event of legal action	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled online filing system and password accessed HomeMaster files	Housing team	Electronic tenancy file on Sharepoint and HomeMaster database	Customer services, Housing Services and Asset teams	N/A
Personal details	Tenant	Contact details Financial details Personal details	Personal data in relation to Housing Needs Assessment at allocation, current household information for each member - DOB, NI, full	Legal requirements to fulfil SST landlord responsibilities and protect organisation	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject	Access controlled online filing system and password accessed HomeMaster files	Housing team	Electronic tenancy file on Sharepoint and HomeMaster database	Customer Services and Housing Services teams	N/A

			name. Benefit entitlements, ASB case data, social work involvement or their relevant supports. Police reports and multi agency meeting minutes. Copy of signed SST		prior to entering into a contract					
			Personal data in relation to Housing Needs Assessment at allocation, current household information for each member - DOB, NI, full name. Benefit entitlements, ASB case data, social work involvement or their relevant supports. Police reports and multi agency meeting minutes. Copy of signed SST	Data required to effectively manage tenancy and offer tenant support. Also for fulfilling all landlord duties and to protect the organisation in the event of legal action	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled online filing system and password accessed QL files	Housing team	Electronic tenancy file on Sharepoint and HomeMaster database	Customer Services and Housing Services teams	N/A
Personal Details	Tenants	Contact details	Held by OIL to do marketing shots		Processing is necessary for the performance of a contract to which the data subject is party		OIL Team	Electronic file	OIL Team	N/A

					or in order to take steps at the request of the data subject prior to entering into a contract				
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HR Data Map

Subject	Category of Data Subject	Category of Personnel Data held	Core Data	Purpose of Processing	Lawful Basis of Processing	Security Controls	Held by who?	Held where?	Who has access?	Names of third party countries or internat orgs that personal data is transferred to
Personal Details	Employee	Contact details Financial details	Emergency Contact information	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Core employment data (PF)	Employee	Contact details	Offer letter(s) Contracts Contract variations Flexible working applications	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A

Pay/ Pension	Employee	Contact details Financial details	Salary data/ letters Pension information NI & Tax information	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Absence	Employee	Health details	Self Certificates Fit notes OH referrals OH reports Return to work interview forms Attendance letters	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Recruitment	Applicant	Contact details	Application forms Interview notes Feedback Panel communications Medical information References Pre employ screening	Staff Admin	The data subject has given consent to the processing of his or her personal data for one or more specific purposes	Access controlled	CS Team	Electronic Recruitment files	CS Team/ Manager	N/A
	Applicant	Contact details	Documents proving right to work in UK	Staff Admin		Access controlled		Electronic PF		

Discipline/ Grievance	Employee	Contact details	Investigation reports Suspension letters Meeting minutes Complain	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Personal Development	Employee	Contact details	Training records Personal development records/ appraisals	Staff Admin		Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Family Friendly	Employee	Contact details	Pregnancy/ adoption/ paternity/ shared parental leave notification MATB1	Staff Admin	Processing is necessary for compliance with a legal obligation to which the controller is subject;	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
	Employee	Contact details	Parental leave request	Staff Admin	Processing is necessary for compliance with a legal obligation to which the controller is subject;	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Working Time Records	Employee	Contact details	Time Sheets	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to	Access controlled	CS Team	Portal Electronic	CS Team/ Manager	N/A

					take steps at the request of the data subject prior to entering into a contract;					
	Employee	Contact details	Holiday Requests	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;	Access controlled	CS Team	Portal Electronic	CS Team/ Manager	N/A
Health & Safety	Employee	Contact details	H&S Assessments	Staff Admin	Processing is necessary for compliance with a legal obligation to which the controller is subject	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
	Employee	Contact details	Accident Books and Records and Reports of Accidents	Staff Admin	Processing is necessary for compliance with a legal obligation to which the controller is subject	Access controlled	CS Team		CS Team/ Manager	N/A
Retirement	Ex Employee	Contact details Financial details	Benefit Scheme Details	Ex Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A

					entering into a contract					
Redundancy	Ex Employee	Contact details Financial details	Calculations	Ex Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
			Selection Details	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Board Members	Board Members		Documents	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/Man	N/A

Former Employee Files	Ex Employee	Contact details Financial details	Documents	Ex Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A
Miscellaneous	Employee		Communication between line manager & employee e.g. time off for hospital appts etc.	Staff Admin	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract	Access controlled	CS Team	Electronic PF	CS Team/ Manager	N/A

Appendix 3

Fair Processing Notice (Customers)

Fair Processing Notice

(How we use customer information)

Dear Sir or Madam

General Data Protection Regulations

Here at Osprey Housing we take your privacy seriously; we will only use your personal information to administer your tenancy and provide the services you have requested from us.

This notice explains what information we collect, when we collect it and how we use it. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

Osprey Housing Group, a Scottish Charity (Scottish Charity Number SC 028461), a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 198586 and having our Registered Office at 22 Abercrombie Court, Westhill (“**we**” or “**us**”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the UK GDPR - Data Protection Act 2018 (the 2018 Act), together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7068533 and we are the data controller of any personal data that you provide to us.

Our Central Point of Contact for Data Protection issues is Clare Ruxton, Director of Corporate Services.

Our Data Protection Officer is Jane McWhirr who is available on 01224548025 or JMcWhirr@ospreyhousing.org.uk.

Any questions relating to this notice and our privacy practices should be sent to the Corporate Services Team.

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us, become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details
- when you apply to become a member;
- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise;
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We collect the following information about you:

- name;
- address;
- telephone number;
- e-mail address;
- Ethnicity;
- Disability;
- National Insurance Number;
- Next of Kin.

We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- Payments made by you to us;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland and other partner agencies (Social work, Support services, etc);
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour

Why we need this information about you and how it will be used

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application, tenancy related queries and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

Sharing of Your Information

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- If we are updating a change of tenancy, your information may be disclosed to third parties when you move in/out (such as utility companies and Local Authority);
- If we are investigating payments received or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK

Your information will only be stored within the UK.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe. Details of how we do this are contained in our Privacy Policy. A copy is available on request or via our website – www.ospreyhousing.org.uk

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Our full retention schedule is available in our Privacy Policy and on our website

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of your we hold; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at enquiries@ospreyhousing.org.uk

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
 Queen Elizabeth House, Sibblad Walk, Edinburgh, EH8 8FT
 Telephone: 0303 123 1115
 Email: Scotland@ico.org.uk

The accuracy of your information is important to us – please fill in the attached census form and return it to us in the envelope provided. And in the future help us keep our records updated by informing us of any changes to your email address and other contact detail when it happens.

Yours sincerely

Clare Ruxton
Director of Corporate Services



CENSUS AND EQUALITIES – HOUSEHOLD UPDATE FORM

Property Address			
Postcode			
Tenancy Start date			
Tenant		Joint Tenant	
Personal Information			
Full Name		Full Name	
Date of Birth		Date of Birth	
NI Number		NI Number	
Mobile No		Mobile No	
Home No		Home No	
Work No		Work No	
Email Address		Email Address	
Employment			
Employer		Employer	
Job Title		Job Title	
Address		Address	
Next of Kin			
Name		Name	
Relationship to tenant		Relationship to tenant	
Address		Address	
Contact tel		Contact tel	
Email		Email	
Equalities Information			
Disability		Disability	
Ethnicity		Ethnicity	
Household Contact preferences			
Letter		Email	
Telephone call		Text message	

HOUSEHOLD DETAILS - Name of everyone who shall be living in the property including children, lodgers, carers, etc.

Full name	DOB	Relationship to tenant	NI Number	M/F	Economic Status

SUPPORT REQUIREMENTS & RAG RATING

Please select the relevant support requirements:			
Social work support		Rent Arrears/debt support	
Child protection intervention		Language/translation	
Drug/alcohol dependency		Literacy/numeracy	
Physical Disability		Mental Health Support	
Domestic Violence		Other	
Support/Social worker contact information		Family member/associate given permission to deal with tenancy – Contact information	

	Signature	Date
Tenant		
Joint Tenant		
Housing officer		

Appendix 4

Fair Processing Notice (Employees)

Osprey Housing

Fair Processing Notice

(How we use employee information)

Dear Colleague

General Data Protection Regulations

Here at Osprey Housing we take your privacy seriously and we will only use your personal information to help us administer your employment with us.

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

1. Osprey Housing Group (“we” or “us”) is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to guidelines published in the UK GDPR and Data Protection Act of 2018 (the 2018 Act), together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7068533 and we are the data controller of any personal data that you provide to us.

Our Central Point of Contact for Data Protection issues is Clare Ruxton, Director of Corporate Services.

Our Data Protection Officer is Jane McWhirr who is available on 01224 548025 or JMcmhirr@ospreyhousing.org.uk.

Any questions relating to this notice and our privacy practices should be sent to either of the above or our the Corporate Services Team.

2. We collect the following information from you through a variety of resources (i) directly from you; or (ii) third parties (including Employment Agencies, pensions service):
 - (a) Name
 - (b) Date of Birth
 - (c) Address
 - (d) Telephone Number
 - (e) E-mail address
 - (f) NI number

- (g) Personal characteristics such as gender and ethnic group
- (h) Qualifications
- (i) Absence information

We collect and use the above information and personal data for:

- a. Administration of contracts of employment
 - b. Payment of salaries
 - c. Recruitment and selection
 - d. Pensions and associated benefits, appraisal, training and development
 - e. Membership of professional bodies
3. We may disclose to and share information about you with third parties for the purposes set out in this notice, or for purposes approved by you, including the following:
- To process your monthly salary payments;
 - To allow your pension provider to process pensions information and handle your pension; (delete if not applicable)
 - If we enter into a joint venture with or are sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.
4. Your information will only be stored within the UK.
5. When you give us information we take steps to make sure that your personal information is kept secure and safe. The ways we do this are outlined in our Privacy Policy that can be found on our website.
6. We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.
- Data retention guidelines on the information we hold is provided in our Privacy Policy available as above.
7. You have the right at any time to:
- Ask for a copy of the information about you held by us in our records; and
 - Require us to correct any inaccuracies in your information
8. If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold or wish to exercise any of your above rights, please contact the Corporate Services Team.
9. You have the right to complain to the Information Commissioner's Office in relation to our use of your information.

The accuracy of your information is important to us – please help us keep our records updated by informing us of any changes to your personal and contact details.

Yours sincerely

Appendix 5 Photo Consent Form

Dear

Thank you for helping us.

At Osprey Housing we produce a wide range of materials, including publicity materials.

From time to time we take photographs to demonstrate the full range of the services that we provide and to promote Osprey and also the housing industry as a whole. By completing and signing this form, you give us your full permission to use the images and any personal information you give us to promote and advertise the aims of the Osprey Group and the social housing industry as a whole. This may include the use of the images and information in a wide range of printed materials, adverts and media. The images will not be used for any other purpose.

The copyright of any material which is generated as a result of this photographic session will be assigned to, and become the property of, Osprey Housing Association. Thank you again for consenting to help us.

Your details

Name			
Address			
Postcode			
Phone number		Mobile	
Email address			
Please state here if there are any ways in which you do not want us to use photo(s) of you			
Signed		Date	

Data Protection Statement

Other than as specified, the information that you give us here will only be used to contact you about these photo(s). We will not pass the details recorded on this form on to any other organisation without your permission.

For internal use only			
Name of shoot/event			
Location		Date	
Image reference(s)			
Contact name		Contact number	

Please return this form to:

Corporate Services Team, Osprey Housing, 22 Abercrombie Court, Arnhall Business Park, Westhill, Aberdeenshire, AB32 6FE

Registered Scottish Charity No: SC 028461