

December 2022

# Privacy Notice

## Allocations - Platinum



### WHO WE ARE:

This privacy notice explains what information Eildon Housing Association (“we” or “us”) collects, when we collect it and how it is used in the allocation process for platinum priority customers. 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. This notice is to make you aware of how we will handle your information.

We are committed to protecting the rights of individuals with respect to the processing of their personal data. We adhere to the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR), together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z7231896, and we are the ‘Data Controller’ of any personal data that you provide to us.

Any queries relating to this notice and our privacy practices should be sent to our Data & Information Officer at [InfoRequests@Eildon.org.uk](mailto:InfoRequests@Eildon.org.uk).

### WHY YOU ARE RECEIVING THIS NOTICE

This notice is for platinum priority customers and is slightly different from the general Allocations Privacy Notice due to the way platinum priority customers are allocated housing and the storage system for personal information.

If we are processing your housing application after receiving a referral from Scottish Borders Council, this will be the first privacy notice you have received from Eildon.

If your application was awarded priority after completing the Eildon Homes application form or are an existing Eildon customer you will have previously been issued privacy notices on the way your personal information was handled in those situations.

All of Eildon’s privacy notices can be found on our website: <https://www.eildon.org.uk/library/#115-privacy> or alternatively you can request a hardcopy of the document and we will post this out to you.

## INFORMATION WE COLLECT AND HOW WE MAY USE IT

To allow us to assess your housing need and provide the service you would expect from us, we process the personal information you make available to us or the information we receive through a referral process. This information may include:

- Your full name
- Address and previous address(es)
- Contact details (phone numbers, email or correspondence address)
- Date of Birth
- Gender
- National Insurance Number
- Names and dates of birth of those currently living with you
- Names and dates of birth of those who will be moving in with you
- Previous tenancy history including landlord contact details
- Your main reason for moving
- Information about your health or disability
- Information about your current housing circumstances
- Information about any criminal convictions
- Information about any complaints of anti-social behaviour made against you or a member of your household
- Arrears information for current or previous tenancies
- Employment details where relevant to your priority application
- Information about your ethnicity, if shared with us
- Any support agencies working with you
- Any particular housing needs
- Any further sensitive information to be taken into account
- Any known risks to lone working
- Any preferences for areas of housing
- Accommodation support plan

### Ways that your information may be used:

- To communicate with you regarding your application and provide information to help offer you suitable properties
- For reporting anonymised statistical information including Annual Return on the Charter and Board reports
- To enable us to respond to queries or complaints you have about your housing application
- If it is necessary to translate any information into or from a foreign language for you your information may be shared with a language translation service
- Call recording information may be used for training and monitoring purposes

**Where appropriate we may also receive the following information from third parties, this will be situational depending on why you have been awarded platinum priority:**

- Medical information from Occupational Therapists, hospital, GP's or any other medical professional to support your application
- Social Work or any other supporting agencies in relation to your application for housing
- References from previous or current tenancies which will include information about rechargeable repairs, outstanding debts and complaints of anti-social behaviour
- Referrals received from Scottish Borders Council come from the following departments:
  - Homelessness services
  - Through care / After care Team (TCAC)
  - MARAC
  - Sex Offenders' Liasion Officer
  - Scottish Borders Health and Social Care Partnership

## EQUALITIES MONITORING INFORMATION

We are required to use your personal information relating to your health, racial or ethnic origin for equality monitoring purposes as required by government departments and agencies, Scottish Housing Regulator and auditors, with other organisations and agencies where we are legally allowed to do so.

We will process such personal information to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within Eildon.

## CHILDRENS INFORMATION

We do not usually process children's information as part of the housing applications process. However, we records children's basic information if they are to be 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.

## WHY WE NEED YOUR INFORMATION

As Registered Social Landlords we are guided by Legislation in who we allocate houses to and need to assess housing need to do that effectively. The information you provide allows us to make that assessment. It also identifies your housing requirements and enables us to allocate you with appropriate properties. We will also on occasion ask for your opinion of the service.

We are under a legal obligation to process certain personal information relating to our applicants for the purposes of complying with our obligations under:

- Housing (Scotland) Acts 1987, 2001, 2006, 2010 and 2014
- Homelessness etc. (Scotland) Act 1987 and 2003
- Antisocial Behaviour etc. (Scotland) Act 2004
- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Children Scotland Act 1995
- Children and Young People (Scotland) Act 2014
- Civil Partnership Act 2004
- Immigration and Asylum Act 1999 and Immigration Act 2014
- Protection from Harassment Act 1997
- Management of Offenders etc. (Scotland) Act 2005

## WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may also be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations including:

- Social Work Teams
- Homelessness services
- Health services
- Other care and support providers
- Criminal Justice Services and Police Scotland

that we work with for the purposes of ensuring we have the necessary information to make an assessment of your Housing Application and ensure that you will be able to access a range of support to help you manage in your tenancy.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

## WHERE WE STORE YOUR DATA

Information for Platinum Priority customers is stored on our electronic information management system and also on our inhouse SharePoint Housing Management Site.

If we receive paper files these will be scanned into the electronic system and the paper version will be destroyed in a timely manner.

If you contact us by email, it is possible that this information will be held in our email server.

## HOW LONG WE WILL KEEP YOUR INFORMATION

Details of applicants with Platinum Priority will stay on our content management system until re-housed or refuse two reasonable offers, each of these stages will move the applications to a withdrawn status. If you withdraw your application for housing the status of your application will also be changed to withdrawn. Withdrawn applicants information will remain on the allocation system for one year from the end of the current financial year.

Once you have been rehoused your personal information will be moved to Eildon's housing management system and further retention periods will be in place. These retention periods are reviewed regularly.

## TRANSFERS OUTSIDE OF THE UK AND EUROPE

Your information will only be stored within the UK.

We will not transfer your personal information out with the UK without making you aware.

## SECURITY

When you give us information, we take steps to make sure that your personal information is kept secure and safe. As we hold your information both in paper format and electronically, we have several different ways to ensure security measures are in place.

Personal information that we hold in paper format for you is kept in cabinets that are locked at the end of each working day.

The information that we hold about you electronically is protected in several ways:

- No access to the network unless the correct user-name and password are entered
- No access to Eildon's computers and smartphones unless the correct username and passwords are entered
- No access to the remotely hosted services unless the correct username and passwords are entered
- All Eildon computers and smartphones are password protected
- All Eildon electronic devices (tablets, notebooks, removeable storage etc.) are encrypted
- Data Loss Prevention software
- A range of cyber security measures
- Anti-virus software
- Policies and procedures, information, and training for staff

Our Privacy Policy can be found in the downloads section of our website: [www.eildon.org.uk](http://www.eildon.org.uk), alternatively you can contact us and we will provide a hardcopy.

## 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
- Ask us to correct any inaccuracies of fact in your information
- Request that we restrict your data processing
- Request data portability
- Rights related to automated decision-making including profiling
- Make a request to us to delete what personal data of yours we hold; and
- Object to receiving any marketing communications from us

You should note that your rights under the UK GDPR and 2018 Act are not absolute and are subject to qualification.

If you would like to find out more about how we use your personal data, would like to see a copy of the information that we hold about you, or wish to exercise any of the above rights, please contact our Data & Information Officer or email: [infoRequests@Eildon.org.uk](mailto:infoRequests@Eildon.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  
 45 Melville Street  
 Edinburgh  
 EH3 7HL  
**Telephone:** 0131 244 9001  
**Email:** [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)

**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 information including your email address and other contact details.**

## How to Contact Us



The Weaving Shed, Etrick Mill,  
 Dunsdale Road, Selkirk TD7 5EB



[www.eildon.org.uk](http://www.eildon.org.uk)



Customer Service: 03000 200 217  
 Main Switchboard: 01750 725900



[www.facebook.com/EildonHousing](https://www.facebook.com/EildonHousing)



[Inforequests@Eildon.org.uk](mailto:Inforequests@Eildon.org.uk)



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INVESTORS IN PEOPLE  
 We invest in people Gold



HOMES FOR SCOTLAND

