

Privacy Notice

The Housing Executive is committed to protecting your privacy and maintaining your trust and confidence in how we handle your personal information. In this privacy notice we have provided as much information as we can on when and why we collect your personal information, what we do with it and the limited conditions under which we may disclose it to others.

Table of Contents

General Information.....	2
Controller’s Contact Details.....	2
Data Protection Officer’s Contact Details	2
What is personal data?.....	3
What is special category data?	3
Why we need your personal information	3
What personal information we collect?.....	4
When do we collect your personal information?.....	5
Children’s information.....	6
How the law allows us to use your personal information	6
Consent.....	7
How you can withdraw your consent.....	7
Service adjustments	7
How long we keep your personal information.....	7
Who we share your personal information with.....	7
Transfers (sending personal information to third countries or international organisations).....	8
Call Recording.....	8
Research & Research Participants	10
Lone Workers Device	11
Visitors to our website	11
What are your rights?	13
How to contact us.....	14
How to make a complaint.....	14
Links to other websites.....	15
Changes to this Privacy Notice	15

General Information

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

Controller's Contact Details

The Housing Executive is the controller for the personal information we process, unless otherwise stated.

You can contact us by phone, email, post or social media.

Postal Address:

Northern Ireland Housing Executive
The Housing Centre
2 Adelaide Street
Belfast
BT2 8PB

Data Protection Officer's Contact Details

Our Data Protection Officer is David Mayers. You can contact him at dataprotection@nihe.gov.uk or via the postal address above. Please indicate on the envelope that the letter is for the Data Protection Officer.

What is personal data?

Personal data is anything that identifies or relates to a living person either by itself or when put together with other information. For example, this could be your address and car registration.

What is special category data?

Special category data is sensitive personal information, for example, details about your physical or mental health or sexuality. This type of personal information needs more protection.

Why we need your personal information

We need to know your personal information so that we can:

- Verify your identity.
- Assess and determine applications for housing or transfer/exchange.
- Assess and determine homeless applications.
- Facilitate the provision of temporary accommodation under homelessness.
- Provide housing advice and assistance.
- Provide homelessness advice and assistance.
- Make appropriate site provision for members of the Irish Traveller Community.
- Manage allocations for dwelling houses and community lettings.
- Manage applications and allocations for garages.
- Manage tenancies and community lettings.
- Determine your housing rights and entitlements such as succeeding to another's tenancy.
- Receive and process rent, service charges, other payments and to pursue arrears.
- Provide a repair, maintenance, adaptations and works service.
- Investigate and manage complaints and anti-social behaviour.
- Assess and administer applications for Housing Benefit & Low Income Rate Relief for all tenure types & Lone Pensioner Allowance for the rented sector
- Assess and administer applications for private sector grants, group repair and energy efficiency schemes.
- Assess and administer applications for social enterprise awards.
- Assess and administer applications for community involvement/cohesion grants.
- Identify and regulate the registration of Houses in Multiple Occupation (HMO).
- Deliver the Social Housing Development Programme (SHDP).
- Deal with unoccupied premises (empty homes).
- Perform data matching to prevent/detect crime, fraud/money laundering.
- Process applications relating to the sale or purchase of land or property.
- Process payments in respect of a claim.
- Administer and manage Supporting People funding.
- Carry out research in relation to any of our functions. e.g. prevention of homelessness.
- Carry out latent demand testing for housing.

- Meet our legal obligations to our sponsor body.
- Perform equality monitoring.
- Assess tenders, procure and pay for goods, works and services.
- Assess, determine and process claims for compensation.
- Detect and prevent fraud.
- Comply with laws and regulations.
- Provide you with information about our services.
- Supply information for use in public consultations.
- Provide official communications and publicity materials.
- To process payments made by you (or on your behalf) or made by us to you (via PayPoint).
- To contact you via letter, email, sms, landline or mobile.
- To provide financial advice and assistance.

If you do not provide the personal information we need, this may impact on our ability to carry out our functions and to provide our services to you, for example, you may not be able to hold a tenancy or lease with us, receive help and housing advice in finding a home, or obtain housing benefit.

Where we can, we will only collect and use personal information if we need it to deliver a service or meet a requirement. If we do not need your personal information we will not ask you for it. We will anonymise your personal information for research purposes.

What personal information we collect?

We collect the following personal and special category information across the range of services we provide:

- Name
- Address
- Date of Birth
- Private Landlord or Tenant details
- Sex
- Telephone/Mobile Number
- Email address
- Marital status
- Photographs and CCTV images
- Proof of Ownership (e.g. lenders statement)
- Household members' details (Name, DOB, NINO (16+), Medical Details)
- Race or ethnic origin
- Membership of a Trade Union
- Nationality
- Criminal Offences or Convictions
- Household composition details
- Occupancy details
- National Insurance Number
- Nominated representative details
- Title deeds
- Employment details
- Education details
- Bank details
- Payment card information
- Financial details (including assets and relevant tax details)
- Copy of primary and secondary Identification (e.g. passport and utility bill)
- Religious Affiliation
- Health/Medical Details
- Sexuality
- Your Photograph

- Membership of a Closed Organisation
 - Claim History
 - Cause of injury
 - Video and audio recordings (In relation to repairs – remote assist)
 - Proof of Ownership (e.g. lenders statement, a copy of your current Rate bill etc.)
 - Social Media details
 - Benefit overpayment details
 - Insurance details
 - Type of injury
 - Incoming and Outgoing telephone calls (in relation to call recording pilot – 3 staff in Belfast CSU and 3 staff in West HB Unit) *
- *Please note no other calls will be recorded within the organisation.**

When do we collect your personal information?

We collect personal information when:

- A person applies for a home, transfer or exchange.
- A person presents as homeless.
- A person contacts us about a housing solutions matter (e.g. housing advice or homeless assistance).
- A person applies for a garage.
- A person applies for Housing Benefit, a Private Sector Grant, Group Repair or an Energy Efficiency Scheme.
- A person applies for or makes an enquiry about a Social Enterprise award.
- A person makes an application for a community involvement/cohesion grant.
- A person advises us of a change of circumstance.
- A person contacts us via social media.
- A person signs a tenancy agreement.
- A person telephones us.
- A person emails us.
- A person contacts us in writing.
- A person contacts us regarding data protection rights.
- A person makes an application to buy or sell land or property.
- A person visits our website.
- A person reports a repair.
- A person applies for a job with us.
- A person is a member of our community involvement/ community cohesion framework.
- We identify or receive an application for registration of a House in Multiple Occupation (HMO).
- We fund supported housing services.
- We receive a claim for compensation.
- We receive and investigate complaints.
- We receive and investigate reports of anti-social behaviour.
- We receive a bid for a contract/tender.
- We investigate alleged fraudulent activities.
- We use CCTV in our office locations.
- We carry out equality monitoring.

- We seek legal advice relating to any of the above circumstances.
- When you register to make a payment (via Paypoint) or make a payment to us.
- When you carry out and accept Benefit and Budget Calculation.
- When you make a phone call to 3 specific members of staff within Belfast CSU and 3 specific members of staff within West Housing Benefit Unit as part of a Pilot Call Recording Exercise.

Children's information

Whilst we do not provide services directly to children we do collect their personal information when we process applications for housing, transfers/exchange, private sector grants etc. We are sometimes given information about children when we investigate a complaint or conduct an investigation. The information in the relevant parts of this notice applies to children as well as adults.

How the law allows us to use your personal information

The law allows personal information to be collected and used for six legal reasons.

Before the change in data protection law on 25 May 2018 we collected and used personal information mainly by consent.

However, as a public body the majority of our functions are governed by housing and related legislation so we will instead be processing personal information on the basis that it is necessary for us to carry out those statutory functions (when we talk about statutory functions this includes our powers and duties which are set out in law); for example, to deal with a housing application or homeless or grant application, or registration of Houses in Multiple Occupation.

This legal reason for processing personal information is known as Public Task. Public Task also allows us to process personal information where it is based on a statutory task and in the public interest.

The other legal reasons for which we process personal information are:

- **Where it is necessary for compliance with legislation** - for example, where we are obliged to provide monitoring information to the Equality Commission for Northern Ireland; to comply with our obligation to carry out annual gas inspections; or to comply with health and safety laws (for example, through floor lifts and stair lifts).
- **Contract** - where you have entered into a contract with us, for example a tenancy agreement and we need personal information to carry out work to the property; or to provide a contractor with personal information to carry out work or provide a service on our behalf.
- **Consent** - for example for research purposes where the research is not necessary for the performance of our statutory functions.
- **Vital Interest** - where we need to protect a person's health and safety or welfare.

Consent

We will seek your consent where it is the only basis on which we can collect or use your personal information. Where your consent is needed we will seek your express consent, which you can withdraw at any time.

How you can withdraw your consent

Where we have sought your consent to collect or use your personal information, you can withdraw this consent at any time by contacting us by phone, email, post, and social media or verbally to a member of staff.

Service adjustments

As a public authority and a provider of services to the public, we have a legal duty to comply with the Disability Discrimination Act 1995 to ensure we make service adjustments for anyone with a disability who contacts us in any capacity, to eliminate any barriers to accessing our services. We will create a record of your adjustment requirements; this will include your name, contact details, type of adjustment required and a brief description of why it was required. Relevant staff will be able to access this information to ensure they are communicating with you in the correct way.

How long we keep your personal information

The length of time that data will be kept may depend on the reasons for which we are processing and holding the information and on the law or regulations that the information falls under. For example, limitation laws, financial regulations, health and safety regulations or any contractual obligations we might have.

We have a disposal schedule which sets out how long we keep different types of information. This complies with the legal requirements for the keeping and destruction of documentation and records by a public body. This schedule will be reviewed and amended as required.

Who we share your personal information with

We may share your personal information with other departments within the Housing Executive when necessary for example, to allow us to process a payment, conduct internal audit investigations or progress compensation claims.

We may also share your information with others, but only where this is necessary, either to comply with our legal obligations or where we are permitted to do so by the data protection legislation. We will not share your information with any third parties for the purposes of direct marketing.

We may share your personal information where necessary to allow a third party working for us or acting on our behalf to provide a service, for example to carry out a repair, to complete disabled adaptation work to your property, to process Housing Benefit or processing a payment. There is a written contract in place which obliges

them to keep personal information safe and to use it only for purposes of the contract.

Where we have your consent to share your personal information with another agency, body, organisation or person or your consent and authorisation for them to share your personal information with us, you can withdraw this at time. However, this may reduce the options available to you or may delay or prevent you from getting the help you need.

In certain circumstances your personal information may have to be shared without your consent. This would be the case if there is a legal duty to provide personal information or where we have the power and are permitted to do so by the data protection legislation, for example:

- We must give information to courts if there are legal proceedings or to another party under a court order.
- We must give information to other bodies responsible for auditing or administering public funds or for the prevention and detection of fraud. As a public body we have a duty to manage and protect public funds and their proper use, for example, we take part in the Cabinet Office's National Fraud Initiative and must provide particular sets of data for matching to assist in the prevention and detection of fraud.
- A person is allowed to share personal information with us about the behaviour of a tenant or anyone living with the tenant or visiting them which we can use to take legal proceedings, withhold consent to a mutual exchange, or decide a person is not eligible for housing.
- We may share your personal information with any other Government Department or public body to whom there is a legal obligation to share information with.

Transfers (sending personal information to third countries or international organisations)

Since the UK left the European Union international transfers are now governed under UK GDPR rules. If we transfer your information outside of the UK we will only do so in order to follow your instructions or comply with a legal obligation. We will ensure the receiving jurisdiction commit to protecting your information with the standards equivalent to those demanded by the UK.

Call Recording

The Housing Executive is currently piloting a call recording system which will record all incoming and outgoing calls. This is currently taking place in Belfast CSU and West Area Housing Benefit. 3 specific members of staff in each area will pilot the call recording software for a period of 2 months at the end of which the pilot will be evaluated and a determination will be taken whether to roll out call recording to other areas of the organisation. Only calls received or made by the 6 specific members of staff will be recorded. **No other calls within the organisation will be recorded at this time.** The Pilot will commence on 01 August 2022.

What is our lawful basis for recording calls?

Recording of calls is necessary to protect the interests of both you, our staff and the organisation.

The Housing Executive's lawful basis for recording calls is **UK GDPR Article 6 (1) (e) - Public Task**.

You have a right to object to your call being recorded. In this situation, you'll normally be advised to contact us either **in writing** or by **email**.

Why are calls recorded?

Recording phone calls with customers allows the Housing Executive to assess customer satisfaction, train and develop staff, review call quality, and have access to a verbal record of what is said in the event of a subsequent complaint.

How will call recordings be used?

- **Quality monitoring** – Written records only provide partial information. A call recording provides a more rounded view and allows us to better understand customer experience and assess the processes applied. This can help us identify any improvement areas.
- **Training and Development** – Listening to a sample number of calls, allows managers to identify training needs. Sample scenarios are based on the recordings but any transcripts are anonymised.
- **Gaining a better understanding of our customers** – Many calls are verbally resolved without the need to complete any records. Listening to sample calls will help us better understand our customer needs, and gain a more informed view of organisations we signpost to.
- **Complaints and disputes** – Some calls are verbally resolved. Where information is entered onto an electronic system this becomes the established record. In the event of a complaint or dispute, a call recording (if available), may provide additional information to help us investigate any allegations.
- **Employee safety and wellbeing** – A recording may become a vital piece of evidence in the event of any threats being made to the organisation or an individual.

How will you be informed call recording is taking place?

- This privacy notice is published on the Housing Executive's website.
- Customers who ring the Housing Executive and are transferred to one of the six staff will hear the following message:

"Your call may be recorded for training and monitoring purposes and personal data may be collected in order to resolve your enquiry. To find out more about how we use your personal data please visit [The Housing Executive - Privacy Notice \(nihe.gov.uk\)](https://www.nihe.gov.uk/privacy-notice)."

- On outbound calls our staff will notify individuals that their call is being recorded.

How long will call recordings be kept?

Recordings are kept securely and confidentially. Call recordings are retained for a period of 12 months after which they are permanently deleted from the system.

Can I request a copy of my call recording?

You can request a copy of your conversation by making a Subject Access Request.

Research & Research Participants

This section provides information for people who are participating in, or have been invited to participate in a research project being undertaken by the Housing Executive or where data is shared with other organisations for research purposes.

How your personal data is collected

All research projects/studies are different and the information collected will vary. You will be given Participant Information (before giving your consent to take part in the project/study) that will provide details of how your personal data will be collected and the specific purpose for which it will be used. Researchers will only collect information that is essential for the purpose of the research.

The type of personal information collected and used will depend on the particular research objectives of the project you are taking part in. Information collected will be proportionate to achieving those objectives and details that are not necessary will not be asked for or collected. The Participant Information Sheet will inform you of what information will be collected about you.

Lawful Basis for processing your personal data

In the context of research, the lawful basis upon which we will process your personal data is usually where “Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller” (UK GDPR Article 6 (1) (e) – Public Task).

We will also process personal data as permitted by UK GDPR Article 9, which permits processing necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Where we need to rely on a different legal condition, such as consent, we will inform you of this in the Participant Information provided to you.

Sharing your personal data

Your information will usually be shared within the research team conducting the project/study you are participating in, so that they can identify you as a participant and contact you about the research project/study.

Individuals from regulatory authorities (people who check that we are carrying out the project/study correctly) may require access to your records. All of these people have a duty to observe and respect the confidentiality of personal data in line with legal requirements, including requirements under the UK GDPR requirements.

If we are working with other organisations and individuals and information is shared about you, we will inform you in the Participant Information given to you. Information shared will be on a 'need to know' basis relative to achieving the research project's objectives, and with all appropriate safeguards in place to ensure the security of your information. We will enter into appropriate data sharing agreements with such organisations.

How long will your information be kept?

The Housing Executive retains information in line with its retention and disposal schedule. You will be advised further about the long-term use (and, where applicable, re-use) and retention of your personal data in connection with the specific research study or project you are participating in. Researches will de-identify information i.e. anonymise or pseudonymise, as soon as possible.

Lone Workers Device

Housing Executive staff are sometimes expected to work on their own. These employees are provided with a technological solution to ensure that they are lone working safely and securely. This solution provides a secure means of contacting colleagues or emergency contacts where there is a requirement to do so.

Audio recordings of events may be taken and retained upon activation of an SOS alert and could be used as evidence in the event of an investigation (criminal or otherwise).

Lawful basis for processing your personal data

The lawful basis for processing your personal data is UK GDPR Article 6 (1) (c) – Legal Obligation. The legislation that informs this legal obligation is the Health and Safety at Work Act 1974 Section 2.

Visitors to our website

When you visit www.nihe.gov.uk we collect the following information:

- Name;
- Email address;
- Mobile number;
- Contact Group (e.g. Housing Executive Tenant, Private Sector Tenant, Landlord etc.);
- IP Address

Further information supplied by you in relation to online services such as address, subscription preferences and information relating to online services may also be recorded in your user account. You can update your cookie preferences, change

your contact details & subscription preferences or choose to delete your account at any time.

The personal data we collect on our website will be used for the following purposes:

- Identify new or returning visitors;
- Allow you to create and maintain a user account;
- Email news and updates on your selected subscription topics using the email address you have provided;
- Provide SMS/text alerts or your selected alerts topics;
- Promote relevant information based on previous visits/ interactions on the site.
- Improvement of information and services on the website in line with visitor feedback, search terms used, and topics & pages read

Analytics

When you visit www.nihe.gov.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

Cookies (not the kind you eat)

To make our website easier to use, we sometimes place small text files on your device. These are used to deliver personalised marketing information and enhanced functionality to website visitors e.g. remembering if the visitor is new or returning to the site, promoting relevant information based on previous website visits & interactions etc.

For more information on how we use cookies please visit our cookies web page at www.nihe.gov.uk/About-Us/Data-Protection/Information-about-cookies.

Security and performance

The Housing Executive website is subject to periodic security tests to ensure that it is maintained in line with best practice. Secure passwords are required to access the website which is hosted securely within the N.I. Department of Finance Enterprise Shared Services/ IT Assist infrastructure. A range of software security/ firewall measures are employed to check that traffic to the site is behaving as would be expected and to detect & reject website behaviour that appears suspicious or a potential security threat. This may involve the processing of visitor IP addresses.

The purpose for implementing all of the above is to maintain and monitor the performance of our website and to constantly look to improve the site and the services it offers to our users.

What are your rights?

The law gives you the following rights in relation to your personal information:

The right to be informed

This right is met by the information contained in this privacy notice.

The right of access

You can ask (either verbally or in writing) for access to the information we hold on you. When we receive a request you are entitled to receive all electronic and hard copy information we hold on you. However, we cannot let you see information which contains:

- Personal information about other people.
- Information which may stop us from preventing or detecting a crime.

The right to object

You have the right to object (either verbally or in writing) to us processing your personal information.

However, if we consider we are unable to stop processing your personal information we will explain why. If you disagree with our decision, you have the right to make a complaint to the Information Commissioner.

The right to rectification

You can ask to change information that you think is inaccurate.

You should let us know (either verbally or in writing) if you feel some of your personal information is wrong. We may not always be able to change or remove information but we will correct factual inaccuracies and can include your comments to show that you disagree with the personal information we hold relating to you.

The right to erasure (This is also known as the right to be forgotten.)

In some circumstances you can ask (either verbally or in writing) for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason it was collected in the first place.
- Where we have relied upon your consent to use your personal information and you withdraw your consent.
- Where deleting the information is a legal requirement.

Where your personal information has been shared with others we will advise them of your request to delete your personal information.

Please note that we cannot delete your information where:

- We are required to have it by law.
- It is necessary for the performance of a statutory function i.e. Public Task.
- Its use involves freedom of expression.
- It is necessary to take or defend a legal claim.
- It is used for scientific or historical research or statistical purposes where it would make information unusable.

The right to restrict processing

You have the right to ask us (either verbally or in writing) to restrict what we use your personal information for:

- If you have identified inaccurate information and have told us about it.
- Where we have no legal reason to use the information but you want us to restrict what we use it for rather than erase the information altogether.

When personal information is restricted it cannot be used other than to securely store the information and with your consent to handle legal claims and protect others.

You have the right to ask us to stop using your personal information. However, this may cause delays or prevent us delivering services to you or performing our statutory functions.

The right to data portability

You have the right to ask (either verbally or in writing) for your personal information to be given to you or another organisation in a commonly used format.

This right only applies if we are using your personal information with consent and decisions have been made by a computer.

Rights in relation to automated decision making and profiling

Where we carry out automated decision making, you can ask to have any computer made decisions explained to you. You have the right to question and challenge decisions made about you using this method and request human intervention.

The Housing Executive carries limited profiling in relation to website usage. This enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our guests and visitors to our website.

You can update your cookie preferences or delete your account at any time.

How to contact us

If you have any concerns regarding your rights, please contact our Data Protection Officer at dataprotection@nihe.gov.uk or by post to Data Protection Officer, Housing Centre, 2 Adelaide Street, Belfast BT2 8PB.

Your request will be assessed and you will be informed of the outcome in writing.

How to make a complaint

If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you can contact the Information Commissioner's Office (ICO) via www.ico.org.uk or email casework@ico.org.uk.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information.

We encourage you to read the privacy statements on the other websites you visit.

Changes to this Privacy Notice

We will review and update this privacy notice as needed. When we make any changes, we will revise the 'last updated' date at the top of this notice and the current version will be at: www.nihe.gov.uk/privacy.

If you require this information in an alternative format – such as audio, large print, Braille – please contact us.