

Privacy notice

Our Privacy Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR).

Introduction

1.1

We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your personal identifiable information. This includes the personal identifiable information we already hold about you now and the further personal identifiable information we might collect about you, either from you or from a third party. How we use your personal identifiable information will depend on the products and services we provide to you.

1.2

This Privacy Notice is a public document available when Reside with Progress (RWP), who are part of Progress Housing Group, obtain and use your personal identifiable information. It explains how we and appointed third party organisations/people use your personal identifiable information and it details your rights. We obtain your personal identifiable information in order to conduct our normal business operations as a registered social housing provider.

1.3

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information. Our DPO, can be reached by email at dataprotection@progressgroup.org.uk, on our main phone number 03333 204555 or by post at Sumner House, 21 King Street, Leyland, Lancashire PR25 2LW, if you have any questions about how we use your personal identifiable information.

1.4

See section 3 Your Privacy Rights for more information about your rights and how our Data Protection Officer can help you.

1.5

This Privacy Notice provides up to date information about how we use your personal identifiable information and now updates any previous information we have published/supplied about using your personal identifiable information. If we make any significant changes affecting how we use your personal identifiable information,

we will make changes to this Privacy Notice, and we will contact you to inform you of these changes

Who we are

2.1

Where we refer to 'we' or 'us' in this Privacy Notice, we are referring to Reside with Progress (RWP), part of Progress Housing Group.

2.2

RWP is the 'data controller' of your personal identifiable information because we determine the use of this information, however if you are also a customer of Progress Housing Group, you will be subject to the Progress Housing Group privacy notice found [here](#).

2.3

Progress Housing Group are a 'Group' of companies. In this Privacy Notice, when we refer to 'Group', we mean other members of our 'Group' of companies, including holding and subsidiary companies such as Progress Housing group Ltd, Progress Housing Association Ltd, Key Unlocking Futures Ltd and Concert Living Ltd.

Your privacy rights

3.1

You have eight rights relating to the use and storage of your personal identifiable information. These are:

The right to be informed;

The right of access;

The right to rectification;

The right to erasure;

The right to restrict processing;

The right to data portability;

The right to object;

Rights in relation to automated decision making and profiling.

For further information regarding your rights, see here: <https://ico.org.uk>

3.2

In brief, you have the right to be informed about who is obtaining and using your personal identifiable information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal identifiable information. You have the right to object to how we use your personal identifiable information in certain circumstances. You also have the right to obtain a copy of the personal identifiable information we hold about you.

3.3

In addition, you can ask us to correct inaccuracies, delete or restrict personal identifiable information or to ask for some of your personal identifiable information to be provided to someone else. You can make a complaint if you feel we are using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights.

3.4

You can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk>.

3.5

To make enquiries for further information about exercising any of your rights in this Privacy Notice, please contact our Data Protection Officer on 03333 204555 or via email at dataprotection@progressgroup.org.uk or write to Data Protection Officer, Sumner House, 21 King Street, Leyland, Lancashire PR25 2LW

What kinds of personal identifiable information we use:

4.1

We use a variety of personal identifiable information depending on the services we deliver to you. For all services, we need to use the following information about you and any occupants of your home:

4.2

Personal information

Your name and date of birth including occupants of the property

Contact details - name, address, email, home and mobile telephone numbers;

Age & date of birth

National Insurance number

Marital status

Identification - information to allow us to check or confirm your identity;

Financial information – information about or for collecting payment for services and equipment, employment details and welfare benefit entitlements

Online computer identification (IP address) – information recorded when you engage with us by email or use our websites;

Next of kin, correspondence or emergency contacts and third parties legally allowed to speak on your behalf;

Your doctor and contact details for them.

Details of criminal convictions or cautions

Photographs

4.3

Special information

Health - to support our housing functions and vulnerable customers;

Race – optional and solely to support our equality monitoring purposes;

Ethnic origin – optional, and solely to support our equality monitoring purposes;

Religion – optional, and solely to support our equality monitoring purposes;

Sexual life or sexual orientation – optional, and solely to support our equality monitoring purposes;

Convictions or criminal activity – to prevent and detect crime, fraud, anti-money laundering and to aid in the prosecution and rehabilitation of offenders.

We do not collect genetic or biometric data.

4.4

Sometimes where we ask for your personal identifiable information to enter into a contract/agreement with you (for example tenancy agreement,) or to meet our legal or regulatory duties, we will not be able to provide some of our support services or products without this information.

How do we gather your personal identifiable information?

5.1

We obtain personal identifiable information by various means, this can face to face, by email, telephone, correspondence and/or by receiving this information from others, for example a support or care provider. We can also receive information about you from other people you know and/or are linked to you, for example: relatives, a person nominated to act on your behalf or your legal representative.

5.2

Some further examples of how we may gather your personal identifiable information are set out below:

directly from you, for example: when you request our service;

by observing or monitoring how you use our products and services;

from other organisations such as local authorities or councils, benefits office, previous landlords, Police, support organisations, Councillors, MP's, credit reference and fraud prevention agencies, or agencies that deal with you on our behalf or refer you into our service;

from other people who know you including joint account holders and people who are linked to you such as emergency contacts;

from monitoring or recording calls as part of quality and complaints monitoring. We record these calls for training and to ensure the safety of our staff. We will not record any payment card details as part of our accounts and payments operations; and

from our CCTV systems for the prevention and detection of crime or to detect damage/vandalism to our properties and to ensure the safety and security of our staff and individuals obtaining services from us.

How we lawfully use your information

6.1

To provide you with our housing services we have a legal duty to confirm a person(s) has the right to reside in the country. We will need to obtain your name, contact details, date of birth, your current and previous countries of residence/citizenship, and a copy of identification documents (such as passport, home office residence papers and driving license).

6.2

To provide you with our services we might need health and social care information (such as physical, social or mental health information or medication).

6.3

We sometimes need to gather, use and share your personal identifiable information for particular reasons, which are set out in more detail below:

To operate and administer our housing, support and care products and services, including managing and responding to complaints:

Contact and occupation information to help us deliver our repairs, maintenance, support, care and housing services. For example our repairs contractors and their appointed sub-contractors.

Contact, lifestyle or circumstantial information and financial details may be shared with Local Authorities, such as local councils. This is shared in relation to processing applications for housing, council tax payment, benefits and universal credit, providing specific support and care services, safeguarding vulnerable individuals and other necessary provisions and services.

We share information with national government departments, ministries and regulators to gather statistical information about tenancies and allocation of properties.

Contact, lifestyle and circumstantial information may be shared with support and care providers in relation to services they provide to you, on our behalf or in conjunction with ourselves, to support your tenancy or related services.

Contact, lifestyle and circumstantial information, financial information and other information may be shared with law enforcement agencies, such as the police and probation service, to report and manage reports of criminal activity, anti-social behaviour and other criminal activities.

We will share any information required with legal service providers, courts and judicial bodies, in order to establish cases relating to breaches of contracts such as tenancy agreements, leases, etc. or to provide advice on legal matters and proceedings.

We record telephone calls, web chats and other contact for training and monitoring purposes with staff, as well as to answer queries or discrepancies.

We share data between our Group subsidiary companies (Progress Housing Association and KEY Unlocking Futures) and our business areas trading as Progress Lifeline and Progress Living, where appropriate, to provide related and linked services.

We engage with IT Service providers to sometimes process data and to also support the computer systems that hold and process your information.

We use your personal identifiable information in this way because it is necessary to meet the conditions set out in the contract/agreement with you and/or to meet our legal or regulatory obligations.

To administer payments to and from your accounts or other agencies (e.g. benefits agency):

Contact and occupation information with benefit agencies and financial advisors who help us to process payments to your account(s).

To supply our appointed financial advisors with information to carry out home ownership affordability tests to advise on the suitability of a mortgage.

To prevent financial crime including money laundering, benefit fraud or illegal subletting.

To support us in the collection of debts and payments.

To provide online or telephone payment services.

To manage Direct Debit payments.

We use your personal identifiable information in this way because it is necessary to meet the conditions set out in the contract/agreement with you and/or to meet our legal and regulatory obligations.

To carry out our duties under health and safety and to support our vulnerable people;

Vulnerability indicators with contractors and sub-contractors to ensure services are tailored to meet your needs.

Caution indicators may be shared with our staff, contractors and sub-contractors to ensure health and safety measures are in place. We will have informed you of this indicator and when it will be applied and for how long, for example: A warning marker will be applied when an incident has occurred which results in a threat being made by you to a member of staff or contractor team.

In handling accident and insurance claims.

In handling legal proceedings arising from claims.

In handling reports to government bodies and regulators.

We use your personal and special identifiable information in this way because it is necessary to meet the conditions set out to meet our legal and regulatory obligations in relation to health and safety.

To carry out our lettings and home ownership affordability assessments and former tenancy debt decisions about you:

Information you give to us about your former addresses will be used to carry out reference checks on your rental history.

Information about those you are linked with in the proposed agreement or contract with us, for example, a joint tenant or owner.

Information about how you or the person linked to you has former debts owing to us or other landlords.

For these purposes, we share and receive information with and from banks, building societies, credit reference and fraud prevention agencies. The credit or fraud prevention agency might add details of our search to the records they hold about you, whether or not your engagement with us proceeds. The use of your information is based on our legal obligations.

To carry out research and analysis to develop and improve our housing, support, care and products and services;

We may share contact details and demographic information with research providers who may contact you to gather feedback and information on our behalf. This is for our use to assess the services we provide and measure customer satisfaction. Research data we receive is anonymised.

Automated decision making

7.1

We may use automated processes to create a profile of you. We do this to help ensure decisions are made accurately, fairly and efficiently and to offer you services tailored to you.

7.2

Profiling is used primarily to establish related groups of customers and services, used in relation to specific service provision, research and statistical purposes.

Our legal basis for using your personal identifiable information

8.1

We only use your personal identifiable information where it is permitted by the laws that protect your privacy rights. This will be where:

we need to use the information to comply with our legal obligations;

we need to use the information to perform a contract with you; and/or

it is fair to use the personal identifiable information either in our legitimate business interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services;

where we need to seek your consent;

it is necessary for us to do so to protect your vital interests

8.2

Where we have gathered and/or processed data with your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See section 12 keeping you up to date, clause 12.2 below, for details about how to withdraw your consent to marketing.

8.3

Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

we have a legal obligation to do so (for example to protect vulnerable people);

it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need and you cannot give consent);

it is in the substantial public interest;

it is necessary for the prevention or detection of crime;

it is necessary for insurance purposes; or

you have specifically given us 'affirmative' consent to use the information.

Sharing your personal identifiable information

9.1

We will share personal identifiable information within RWP, across our parent Group and with others outside RWP, where we need to do so to make products and services available to you, market products and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so. See section 6, How we use your personal identifiable information for more information.

9.2

Who we share your personal identifiable information with, depends on the products and services we provide to you and the purposes for which we use your personal identifiable information. For most products and services we will share your personal identifiable information with our own service providers such as IT service providers, contractors and suppliers, local authorities and crime prevention agencies. See section 6, How we use your personal information for more information on who we share your personal identifiable information with and why.

9.3

Most of the time the personal identifiable information we have about you is information you have given to us, or gathered by us in the course of providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for fraud prevention or marketing purposes for example, so you can receive the best offers from us and our partners. See section 6, How we use your personal information for more information on who we get your personal information from and why.

Transfers outside the UK

10.1

We may need to transfer your information outside the UK to companies, service providers, agents, subcontractors and regulatory authorities outside the UK. We will usually restrict data to those countries where data protection laws provide the same level of protection as those in the UK but this will not always be practical or possible. There may be times where we need to transfer your data to countries such as the USA where the laws do not provide equivalent protection. Where this is the case, we ensure appropriate safeguards are put in place to protect your information before any processing takes place.

You can find out more information about standard contractual clauses as detailed by the ICO. Visit their website at ico.org.uk ([Link opens in a new window](#)) and search for 'International transfers'.

How long do we keep your personal information for?

11.1

How long we keep your personal information for depends on the services we deliver to you. We will never retain your personal identifiable information for any longer than is necessary for the purposes for which we need to use it or while it can be used to raise a complaint or legal claim in relation to the products or services provided.

Keeping you up-to-date

12.1

We will communicate with you about products and services we are delivering using any contact details you have given us - for example by post, email, text message, social media, and notifications on our app or website.

12.2

Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by contacting us directly. For contact details, visit our website on <https://contactus.progressgroup.org.uk/>

Your online activities

13.1

We use cookies to track your use of our websites. We may use cookies to provide tailored marketing messages when you are logged into our website, if you have given us consent.

13.2

We also use website analytics to capture data about how our website is used. This data is anonymised, so we cannot identify you individually from your activity.

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information.

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