

Privacy Notice: Clients and Visitors

Who are we?

Transform Housing & Support ('Transform', 'We', 'Us', 'Our') is committed to protecting the privacy and security of your personal information.

Any personal data we collect about you will be strictly in accordance with UK Data Protection Legislation (including the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018). As a data controller we are responsible for deciding how we hold and use personal information about you.

This privacy notice tells you what to expect when Transform t collects and stores personal and sensitive information. It tells you about the purposes for which we will process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

In this notice, whenever you see the words 'we', 'us', 'our', or 'Transform", it refers to Transform Housing & Support. Please find below our registration numbers:

- ICO registration number: ZA 1600063
- Registration charity number: 264133
- Company limited by guarantee registered in England and Wales: 01057984
- Registered provider of social housing: H2452.

Who the personal data relates to

We collect and hold personal information about:

- **Clients** – This includes current, former and potential clients who live in our properties or access our support and other services and includes members of their family and people associated with them.
- **Visitors** – Visitors to our website and our offices, those who email, call, message us via a social media application or write to us, including anyone who makes a complaint or enquiry to Transform.

What type of personal data is collected

The personal information we collect will depend on our relationship with you and the services we are providing. We will only collect the information necessary to fulfil our obligations to you and in accordance with the legal bases set out below.

Clients

When you apply to become a Transform client, we obtain information to determine your housing needs.

You will provide us with information through your referral form. We will also use information from third parties such as other housing providers/private landlords, local authorities, appropriate to help us to assess your application.

We may collect the following personal data from you:

- Name and contact details (including email, telephone numbers and your current, previous and forwarding addresses).
- Identification information (including your date of birth and gender).
- Family details (including next of kin and marital status).
- Financial information (including your income, welfare benefit entitlements and bank account details).
- National identifiers (including National Insurance, social security number, passport or driving licence number).
- Online identifiers (including IP address or cookies).
- Device identifiers (for example identifiers for a smartphone).
- Signature and /or photographic identification.
- Photographs, CCTV images, films and telephone recordings.
- Whistleblowing (confidential reporting) information.

We may also need additional information from you concerning:

Disabilities or vulnerabilities – We use this information to tailor our service to better meet your needs. We may also use this information for safeguarding of colleagues or clients.

Health information – to provide housing related support services

Financial information – In order to ensure that arrears payments are settled quickly, we may collect additional information to help us to work out a payment plan with you. In addition, to provide welfare, benefits and budgeting advice as a free service to help you budget, pay your bills, or to apply for funding on your behalf.

Identification – Photo ID, bank statements, payslips or income details may be used to evidence your right to rent and to provide budgeting advice and information to ensure you are able to pay your rent and maintain your accommodation.

We will record information whenever you contact us or use our services and we will note any action taken, for example logging repairs, and feedback from our contractors about appointments with you, so that we have a record of what happened and of our contact with you.

We minimise collection and use of sensitive information, however, given the services we provide, there are times when we use it to understand our customers and their needs better, such as providing accommodation for clients with disabilities or when dealing with neighbourhood disputes involving alleged criminal activity.

We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest or protect your vital interest in relation to the services we provide, to provide you with support, or to deal with any legal action. If we do not hold this information, we may not be able to provide all our services to you.

Visitors

We will keep a record of your contact with us, whether by phone, email. This may include CCTV images, logs of calls to our colleagues or, any requests or conversations that took place with us.

For visitors to the website, in order for our website to work correctly, we automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, make and model, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our website via your mobile device we will collect your unique phone identifier.

Information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as but not limited to scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number and the terms that you use to search our website.

For further information, please contact us.

CCTV and photographs

Some of our sites have CCTV in place to help protect colleagues, clients, our visitors, and our properties. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for a set period of time after which it is recorded over. Signage is in place to inform people that cameras are in operation. Access to our recorded CCTV footage is limited to those with the appropriate training and security clearance.

Further details are available in the [CCTV policy](#).

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity.

How we use your personal data

Your personal data will be collected and used to help us deliver activities or services or to complete a task raised at your request.

What we do with your information will depend on the nature of our relationship with you and how you interact with our various services and website.

Enter into, or manage any contract we have with you under Article 6 (1) (b) UK GDPR:

- Processing applications and requests for, but not limited to, rental accommodation
- Managing tenancies including collecting rent and service charges
- Ensuring compliance with the conditions of any agreement between us
- Providing repairs, maintenance and adaptations at our properties
- Provide support for elderly and vulnerable customers

Comply with our legal and regulatory obligations, and acting in the public interest (Article 6 (1) (e) UK GDPR), such as:

- Preventing and detect crime and resolve disputes
- Preventing and detect fraud and money laundering
- Promoting safety and the quiet enjoyment of our neighbourhoods and communities
- Promoting equal opportunities and fair treatment for all our clients
- Meeting the obligations we owe to our funders and regulators

Provide you with services and benefits in both our legitimate interests (Article 6 (1) (f) UK GDPR):

- Monitor, analyse, deliver and improve our services to you and home members.
- Ensure the proper management of your tenancy and give you appropriate support where needed.
- Assist you in the management of account charges, payments and arrears Provide information about support or services to allow you to better manage your home.
- Respond to your enquiries, keep in touch with you to understand your needs and preferences.
- Promote our products and services and invite you to events.

Children's personal data

We do not usually process data on children aged under 18 that live in our properties, as all of our tenants are adults. Where our clients are aged 16 and 17 and are looked after children or care leavers we will hold the same information as for all clients. As part of our responsibilities under OFSTED we will also hold details of next of kin, authorised addresses, education and learning establishments, health issues and any incidents or accidents.

Where children in our accommodation are not our primary client, we retain the responsibilities of a landlord and also have a duty to safeguard children. Information collected will be used for those purposes. We record children's basic information if they are 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.

We may also receive children’s information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

How we share your personal data

During the course of our business, we will restrict disclosure of personal information to only limited individuals (i.e. relevant colleagues, insurers, professional advisors, agents, solicitors, suppliers or contractors) and we will only disclose your personal data where we are required under a legal obligation such as to assist with the detection of crime and/or we believe it is your or the public’s interest to do so.

Where we share data with a third-party organisation or statutory agency we will ensure that the organisation or agency understands how the data is to be used, what information is to be shared and when it will be destroyed. We may provide more detailed information to you about any data sharing that takes place, or you can ask us for more information about it.

In some cases, we may be legally required to provide information to one of these other organisations – for instance, in certain circumstances we may be required to provide information about housing benefits to a local authority or central government department.

Our colleagues are trained in data protection and know the importance of keeping your data safe and secure.

The list below sets out specific examples of where we may share your information but this is not an exhaustive list:

Public authorities such as:	Organisations not designated as public authorities, such as:
<ul style="list-style-type: none"> ■ The emergency services – fire service, police, ambulance and NHS ■ Local authorities (including the police and children’s services) ■ The Home Office, Department for Work and Pensions (DWP) and Her Majesty’s Revenue and Customs (HMRC), Department for Levelling Up Housing and Communities (DLUHC), Department of Energy Security & Net Zero (DESNZ) ■ Some academic institutions ■ Members of Parliament and Councillors ■ The courts ■ The Information Commissioner’s Office ■ Other Regulatory Authorities including the Regulator for Social Housing, the Charities Commission, OFSTED, the Fundraising Regulator and Companies House 	<ul style="list-style-type: none"> ■ Specialist care provider organisations and charities ■ Utility providers ■ Interpretation services ■ Insurance services, solicitors and auditors and consultants ■ Maintenance companies in a contract with us ■ Credit reference agencies ■ Medical professionals ■ Other housing providers and landlords

We don't sell or provide your personal information to other organisations for their marketing purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity.

International data transfers

Your personal data may be transferred outside the UK. We will ensure that all international transfers comply with applicable data protection laws by implementing appropriate safeguards in compliance with Chapter V UK GDPR.

For example, when we appoint data processors, we check that suitable arrangements are in place such as Adequacy Regulations, binding corporate rules, international data transfer agreements, standard contractual clauses, or other permitted mechanism.

The restricted transfers we make include transferring personal data to the EU (Germany and Ireland), New Zealand, and the US under the UK extension of the EU:US Data Privacy Framework and/or standard contractual clauses. Further information about the safeguards related to the international transfers we make can be provided on request.

For further information, please contact us.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will usually keep:

- Any application for accommodation for 6 years following acceptance of the offer of accommodation.
- Information on your tenancy file for 6 years following the end of your tenancy with us.
- Support plans and related documents permanently, or until transferred to a subsequent provider.
- Call logs and voice mail messages for 6 months, CCTV video footage 30 days unless the footage is being used to investigate an alleged crime or incident in which case it may be retained for up to 2 years following the conclusion of any investigation or legal action.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

In some circumstances, you can ask us to delete your personal data. Please see below for more information about your right to erasure.

Details of retention periods for different aspects of your personal information are available in our retention policy which can be exercised under the “How to Contact Us” section of this policy.

Your rights

Under UK data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.
- **Your right to object to direct marketing** - Where your personal data is processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the **right to object** to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. To exercise any of these rights, please contact us.

Making a complaint

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. You can contact them by calling 0303 123 1113 or online at www.ico.org.uk/concerns.

Use of cookies

Like many websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow the website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. Navigate to our Cookie Policy page to manage your consent preferences and to understand more about how we collect and store cookies.

Links to other websites





Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Changes to our privacy policy

We may update this Privacy Notice from time to time by posting an amended version on our website. If at any time we decide to use your personal data in a different manner than was stated at the time it was collected, we will notify you directly via email.

Our Contact Details

If you have any questions in relation to this document or how we use your personal data they should be sent to:

 <p>Bradmere House Brook Way Leatherhead Surrey KT22 7NA</p>	 <p>01372 387 100</p>
 <p>gdprinfo@transformhousing.org.uk</p>	 <p>Contact us Transform Housing & Support</p>

Our **Head of Governance & Assurance, Mandy Arnold**, can be contacted on:
01372 387124.

Data Protection Officer

We are supported in our compliance with, and management of, data protection matters by:

Data Protection People Limited
Round Foundry Media Centre
Foundry Street
Leeds LS11 5QP
Tel: 0345 340 5412

Signature: 

Date: 14 February 2025

Record of Change History

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	Chief Executive	14 February 2025

The privacy notice was last updated in February 2025 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.