

Privacy Statement

1. INTRODUCTION

Weslo Housing Management (WHM) and Weslo Property Management (WPM) are registered as a 'data controllers' under the Data Protection Act (ICO Registration Z4942312 and ZA029223 respectively) as we collect and process personal information about you. We process and hold information about you in order to provide services. This Notice explains how we use and share your information. Information may be collected on paper or on an online form, by telephone, email, CCTV or by a member of our staff or one of our partners.

We will continually review and update this Privacy Statement to reflect any changes in our services and feedback that we may receive from our tenants, other customers or others, as well as to comply with changes in the law. When such changes occur, we will revise the last version.

2. WHY DO WE COLLECT INFORMATION ABOUT YOU?

We need to collect and hold information about you, in order to:

- Deliver public services
- Confirm your identity to provide some services
- Contact you by post, email or telephone
- Understand your needs to provide you with the services that you request
- Understand what we can do for you and inform you of other relevant services and benefits
- Obtain your opinion about our services
- Update your records
- Help us to build a picture of how we are performing at delivering services to you
- Allow us to undertake statutory functions efficiently and effectively
- Make sure we meet our statutory obligations including those related to diversity and equalities

3. HOW WE USE YOUR INFORMATION

We will use the information you provide in a manner that conforms to the Data Protection Act. We will endeavour to keep your information accurate and up-to-date and not keep it for longer than is necessary. In some instances the law sets the length of time information has to be kept. We will process your information for the following purposes:

- For the services you requested, and to monitor and improve our performance in responding to your request;
- To allow us to be able to communicate and provide services and benefits appropriate to your needs;
- To ensure that we meet our legal obligations;
- Where necessary for law enforcement functions;
- To prevent or detect fraud;

- To process financial transactions, including grants, payments and benefits or where we are acting on behalf of government bodies e.g. Department of Work and Pensions;
- To protect individuals from harm or injury; and
- To allow statistical analysis of data to assist us in the provision of services and continuous improvement.

We will not pass any personal data onto third parties, other than those who either process information on our behalf or because of a legal requirement. We will only do so once we have established that sufficient steps have been taken to protect the personal data by the recipient. We will not disclose any information that you provide "in confidence" to us, to anyone else without your permission, except in the few situations where disclosure is required by law or where we have good reason to believe that failing to share the information would put someone else at risk. You will be told about this.

4. INFORMATION SHARING

We may need to pass your information to other people and organisations that provide a service. These providers are obliged to keep your details securely and use them only to fulfil your request. If we wish to pass your sensitive or confidential information onto a third party, we will only do so once we have obtained your consent, unless we are legally required to do so. We may disclose information to other partners where it is necessary, either to comply with a legal obligation, or where permitted under the Applicable Data Protection Laws being defined as means (a) European Union or Member State laws with respect to any Company Personal Data in respect of which Weslo is subject to EU Data Protection Laws; and (b) any other applicable law with respect to any Personal Data in respect of which Weslo is subject to any other Data Protection Laws], e.g. where disclosure is necessary for the purposes of the prevention and/or detection of a crime. Where we need to disclose sensitive or confidential information such as medical details to other partners, we will do so only with your prior explicit consent or where we are legally required to do so. We may disclose information when necessary to prevent risk or harm to an individual.

At no time will your information be passed to organisations external to us and our partners for marketing or sales purposes or for any commercial use without your prior consent.

5. IMPROVING CUSTOMER RECORDS

We are working to make our record keeping more efficient in order to provide our services and minimise duplication of work. This means only having to update any changes to your personal details once which can then be shared appropriately and with those who require the information to provide the service to you.

6. TELEPHONE CALLS

We will inform you if we record or monitor any telephone calls you make to us. Calls made to and from our offices are recorded. We do not record any financial card details if you then make payments by telephone. If the call is transferred to a member of staff then the call will stop recording.

Call recording is used to increase your security, for our record keeping of the transaction and for our staff training purposes.

7. EMAILS

If you email us we may keep a record of your contact, your email address and the email, for our record keeping of the transaction. We would suggest that you keep the amount of confidential information you send us via email to a minimum and use our secure online forms and services.

8. WEBSITE

We utilise cookie technology to help log visitors to our website. A cookie is a string of information that is sent by a website and stored on your hard drive or temporarily in your computer's memory. The information collected is used for the administration of the server and to improve the service provided by the website. No personal information is collected this way. You can reject the use of cookies but you may be asked for information again, e.g. to participate in a survey. This statement only applies to our own website and does not relate to other websites that are linked from our site.

9. CCTV/SURVEILLANCE

We have installed CCTV systems in some of our premises used by members of the public, for the purposes of public and staff safety and crime prevention and detection. The CCTV is also installed on the outside of some of our buildings for the purposes of monitoring our building security and crime prevention and detection.

Images captured by CCTV will not be kept for longer than necessary. However, on occasions there may be a need to keep images for longer, e.g. where a crime is being investigated.

You have the right to see CCTV images of yourself and be provided with a copy of the image.

10. HOW WE PROTECT YOUR INFORMATION

Our aim is not to be intrusive and we won't ask irrelevant or unnecessary questions. The information you provide will be subject to rigorous measures and procedures to make sure it can't be seen, accessed or disclosed to anyone who

shouldn't see it. We have an Information Governance Framework in place that includes Data Protection and Privacy policy and a set of Information Security policies. These define our commitments and responsibilities to your privacy and cover a range of information and technology security areas. We provide training to staff that handle personal information and treat it as a disciplinary matter if they misuse or do not look after your personal information properly. We will not keep your information longer than it is needed or where the law states how long this should be kept for. We will dispose of paper records or delete electronic personal information in a secure way.

11. YOUR RIGHTS

You have the right to request that Weslo Housing Management stop processing your personal data in relation to any service we provide. However, this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request but we may be required to hold or process information to comply with a legal requirement.

We will try to ensure that any information we hold about you is correct. There may be situations where you find the information we hold is no longer accurate and you have the right to have this corrected. Please contact us at corporate.services@weslohm.co.uk and we will assist further to ensure correctness of information.

12. MONITORING & REPORTING

We will continually review and update this Privacy Statement to reflect any changes in our services and feedback that we may receive from our tenants, other customers or others, as well as to comply with changes in the law. When such changes occur, we will revise the last version.

RETENTION SCHEDULE

In the course of its activities Weslo Housing Management (WHM) & Weslo Property Management (WPM) gathers, stores and processes personal information about its tenants and other individuals. Article 5 of the General Data Protection Regulations requires companies to meet certain obligations when processing personal information to prevent that information being improperly used or distributed.

Article 5 of the GDPR requires that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The retention policy timescales for WHM & WPM are attached.

CATEGORY	RETENTION	COMMENTS
HUMAN RESOURCES		
Senior Executives' records	Permanently	
Personnel Files and training records [including application forms, references, contracts of employment, appraisals, disciplinary records and working time agreements]	6 years	From end of employment, to cover time limit for any civil action
Sickness records, calculations, certificates, reports.	6 years	From end of employment, to cover time limit for any civil action
Maternity/Paternity benefits	3 years	From end of tax year in which the maternity period ends
Parental Leave	18 years	From the birth of the child
Redundancy Information	6 years from redundancy date	from redundancy date
UK right to work documents	2 years	After employment ceases
Disclosure Scotland Checks	6 months	Details of conviction destroyed upon receipt
Unsuccessful Application Forms and interview notes	12 months	From date of interviews allow doe claims through employment tribunals
Time Records	2 years after audit	
FINANCE		
Bank Statements & Instructions	7 Years	
Loan Agreements	7 Years	
Agreements	7 Years	
Main Cash Book	7 Years	
Daily Cash Sheets	7 Years	
Cash Records (including petty cash records & cash receipts)	7 Years	
Bank Reconciliation	7 Years	

Expenses claims	7 Years	
Tax returns and records	7 Years	
Documents relating to successful tenders	7 Years	
Documents relating to unsuccessful tenders	1 Year after notification	
Trial balances	7 Years	
VAT Records & correspondence	7 Years	
Orders & Delivery Notes	7 Years	
Certificate of Employers Liability Insurance	7 Years	
Annual Insurance Schedules	7 Years	
Claims & related correspondence	7 Years	
Current and former policies	7 Years	
Trial balance working papers	7 Years	
Report & Financial Statements – Signed Copy	7 Years	
Annual accounts working	7 Years	
Balance Sheets & Supporting Documents	7 Years	
Employee (P45) (P48) (P6) (P60)	9 Years	
Payroll, PAYE returns, Tax information	9 Years	
Pension & NI Contributions	9 Years	
Overtime Claims	7 Years	
Invoices & Credit Cards for Purchase, Receipts	7 Years	
ESTATES		
Applications for housing and transfer to alternative accommodation.	Duration of application + 1 year. Successful applications would move to individual tenant files.	Best Practice (National Housing Federation) WLC

	Unsuccessful applications 1 year from decision/close of case.	
Scottish Secure Tenancy Agreements	Duration of tenancy and 5 years following termination	Business Requirement (WLC)
Tenant File Correspondence re tenancy; tenancy files; application forms and supporting material; application of transfer of tenancy and supporting papers.	Duration of tenancy and 5 years following termination	
Rent arrears, Notice of Proceedings, Court Actions, Decrees and Evictions.	Duration of activity and 6 years from last action.	Business Requirement (WLC)
Housing Benefit and Universal Credit Notifications.	2 years. Cases resulting in rent arrears would move to the rent arrears files.	Business Requirement as may be required as part of a proof hearing.
Rent Statements	2 years.	
Unauthorised Occupants	Duration of activity and 5 years from last action.	Business Requirement (WLC)
Documentation, correspondence and information provided by other agencies relating to the needs of the current tenant.	While tenancy continues. Destroyed at end of tenancy.	Documents could be returned to external agency or destroyed.
Records relating to offenders, ex-offenders and persons subject to cautions.	While tenancy continues. Destroyed at end of tenancy if not relating to Anti-Social Behaviour. Where action taken on Anti-Social Behaviour 5 years after close of investigation or 10 years in cases with Court Actions.	Documents could be returned to external agency or destroyed.

Anti-Social Behaviour investigation Files	5 years after close of investigation.	
Former tenants', Tenancy Agreements and details of their leaving.	6 Years	Best Practice (National Housing Federation)
Governance		
Board Members Details	Permanent Retention	
Board Meeting Documentation	Permanent Retention	
Corporate Publication	Permanent Retention	
Registration documentation	Permanent Retention	
Charter (ARC) & Working Papers	5 Years	
Accident books, records and reports of accidents	3 years	
Photographs	5 Years	