

Privacy policy

The privacy and security of your personal information is extremely important to us.

Your contact with us generates records including records of some personal information which is subject to data protection legislation.

This privacy notice explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information. We'll never sell your personal data and will only share it with organisations we work with when it's appropriate and the privacy and security of your data is assured.

We'll keep this page updated to show you all the things we do with your personal data and we will let you know about any key changes that affect you. In certain circumstances we may also provide an extra privacy notice, which will always refer back to this page.

Overview

This policy applies if you're a tenant, customer, or use any of our services, visit our website, email, call or write to us.

The type of information we collect depends on our needs. For example, if you contact or visit us, we may only need limited information about you to deal with your query. If you are one of our customers, we may need to collect a variety of information about you to ensure that we can provide you with appropriate housing, comply with the terms of your tenancy agreement with us, or to provide you with or refer you to appropriate support services to assist you. Information may include your contact details, financial information (including the receipt of benefits), or mental or physical health information (including whether you have any disabilities we should be aware of). We may also need to collect certain information to meet our statutory obligations.

We ensure that the information we hold about you is only used for limited purposes and only kept for as long as is necessary to provide you with services, deal with your tenancy, or to comply with our other statutory or regulatory obligations. We may need to share some information with third parties, such as local authorities, benefits departments, our repairs and maintenance contractors, social services, other social landlords and government departments as required, and the emergency services.

You also have various rights in relation to your personal data, including the right to see copies of the personal data we hold about you, or to make a complaint to the regulator, the Information Commissioner's Office.

This is only a simple overview of how we use your personal data. The rest of this notice is split into sections to make it easier to understand. By clicking on each of the links below, you can see more detailed information about what personal data we have and what we do with it.

If you have any queries about this notice, please contact us

[Slavery statement](#)

Our slavery statement can be viewed at the end of this policy.

Who are "we"?

In this policy, whenever you see the words 'we', 'us', 'our', or 'Sovereign', it refers to Sovereign Housing Association Limited. Our ICO registration number is ZA221241.

We are a Registered Social Landlord (RSL) regulated by the Regulator of Social Housing

As a Social Housing provider, our normal activities can be summarised as:

1. Providing social and other types of housing.
2. Property and grounds maintenance and repair.
3. Managing your housing, tenancy/lease and account as your landlord.

We also provide additional optional services including:

4. Organising and assisting community events.
5. Offering opportunities to be involved (co-regulation).
6. Providing welfare, benefits and debt advice (WBDA).
7. Adaptations made to the properties we manage.
8. Selling properties.

Contacting us

If you have any questions in relation to this document or how we use your personal data they should be sent to: data.protection@sovereign.org.uk or

The Data Protection Officer,
Sovereign Housing Association,
Woodlands,
90 Bartholomew Street,
Newbury
RG14 5EE

Who the personal information relates to

We collect and hold personal information about:

Customers - This includes current, former and potential customers 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 or write to us, including anyone who makes a complaint or enquiry to Sovereign.

How we collect personal information

We collect information in a variety of ways.

You can give us personal data by filling in forms provided by us, for example at tenancy sign-up, by registering to use our customer portal, subscribing to take part in research on our website or other social media functions on our website, promotion or survey or by corresponding with us (by phone, email or by joining as a customer).

We also collect information through our ongoing contact and correspondence with you, and with other support agencies which relate to you, and from people associated with you such as family, friends and neighbours.

We record calls to and from our Contact Centre. At some schemes and offices we also have CCTV cameras to record events in public areas.

If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and consent.

It is important that you notify us of any changes to your personal information as soon as possible so that we can contact you easily. Please let us know

What information we hold

Customers

When you apply to become a Sovereign customer, we obtain information to determine your housing needs.

You will provide us with information through your application form. We will also use information from third parties such as other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the Police, the Probation Service, support workers, social workers, mental health workers and credit reference agencies where appropriate to help us to assess your application.

We will generally require the following information from tenants and leaseholders:

- Full name including proof of your identity / photo ID

- Date of birth
- National Insurance number
- Contact details, including telephone, email or contact address
- Details of anyone authorised to act on your behalf if applicable
- Personal Details of all household residents
- Banking or payment card details if you make payments to us
- Benefit and Council tax information
- Proof of housing eligibility

Other personal information may be collected in order to help us resolve breaches of tenancy, alleged anti-social behaviour or suspected fraud.

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 staff.
- Health information – when we require this to support funding for adaptations made to the property you are living in. More specific details are provided if you use this service.
- Financial information – It is important that in order to ensure that arrears payments are settled quickly, therefore we may collect information to help us to work out a plan with you. In addition to provide welfare, benefits and debt 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 during the processing of a house sale or purchase.

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.

Visitors

We will keep a record of your contact with us, whether by phone, email, in writing or in person. This may include CCTV images, recording of calls to our Contact Centre, and noting any action taken as a result of your contact with us.

For visitors to the website, 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, 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.

Please note that certain services on our website won't be available to you until you've registered to use our website, this includes our customer portals.

For further information please also see our website terms and conditions and Cookie Policy

CCTV and photographs

Some of our locations and offices have Closed Circuit Television (CCTV) and you may be recorded when you visit them. CCTV is used to provide security and protect both our visitors and communities. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for set period of time after which it is recorded over. Sovereign complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices so you know when CCTV is used.

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent, which is held within our Communications Team.

How we use your information

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, website and customer portals.

We use your personal information to allow us to:

Enter into, or manage any contract we have with you, including:

- Processing applications and requests for:
 - Rental accommodation (including private market rent)
 - Home ownership
 - Garage rental
 - Sovereign Careline service
 - Keyworker 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
- Providing home ownership products
- Provide care and support for elderly and vulnerable customers

Provide you with services and benefits in both our legitimate interests, including ensuring the proper management of your tenancy and giving you appropriate support:

- Offering help with debts and benefits advice
- Assisting you in the management of account charges, payments and arrears, including through our online portal
- Providing support services to help customers achieve their goals
- Keeping in touch with customers to understand your needs and preferences and invite you to events
- Provide information about Home Contents Insurance Schemes
- Engaging with customers to make improvements to our products and services

Comply with our legal and regulatory obligations, and acting in the public interest, such as:

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

Under the data protection legislation certain personal information is classified as "sensitive" or "special category" personal data. This includes information relating to racial or ethnic origin, physical or mental health, sex life or sexual orientation, religious or philosophical beliefs, political opinions, membership of a Trade Union, allegations of criminal offences and criminal convictions and offences, along with biometric data such as fingerprints.

We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to understand our customers and their needs better, for example when providing accommodation for disabled persons or those with problems around substance abuse, when resolving neighbourhood disputes involving alleged criminal activity or when helping someone to access care services. We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.

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. However, 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.

Sharing your information

Your personal information will be kept secure and confidential. Our staff and volunteers have restricted access to personal information on a "need to know" basis.

We may share information with third parties, including contractors we work with such as our repairs and maintenance contractors, third party cloud hosting and IT infrastructure providers, agencies and authorities we work with, such as Local Authorities, Social Services, Police, other social landlords.

We will share certain information in appropriate circumstances with our regulators, funders, or purchasers or potential purchasers of our business. We will also share relevant information with others when Sovereign believes it is in your, or the public's, interest to do so, such as to keep customers, staff or visitors safe, or as required by law.

In particular, please be aware:

- Current or forwarding addresses may be shared with utility companies and Council Tax offices to ensure billing details are correct
- If you default on any tenancy/licence conditions, information about you may be provided to authorised debt recovery agencies, to enable them to recover the debt. This may affect future applications for tenancies, credit and insurance
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external debt advice agency, Welfare rights advisor, the housing benefit department or the local authorities housing advice and homeless prevention team to make sure that benefits are paid correctly
- We may pass data about your rent payment record to credit reference agencies. This will enable them to assist other organisations to assess your financial standing if you apply for products and services
- We may pass your contact information to a third party to conduct surveys and research on our behalf which allow us to gather feedback and improve the services we offer you. The third party will be bound to strict terms and conditions outlined by us and will not share your data with other organisations. Should you choose not to participate in the surveys the third party will securely destroy your data
- We may share your National Insurance number to verify your Universal Credit application and manage these payments and to prevent and investigate tenancy and right to buy applications fraud.

When we allow third parties acting on behalf of Sovereign to access to your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

Fraud Prevention

We occasionally participate in the National Fraud initiative (NFI) data matching exercise carried out by the Cabinet Office. Our participation in NFI assists in the prevention and detection of fraud against Sovereign and organisations within the public sector. We participate on a voluntary basis and provide the Minister for the Cabinet Office with particular sets of data for matching as detailed here.

We are also part of the National Anti-Fraud Network (NAFN) and therefore may share information with them as required.

The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned. Data matching by the Cabinet Office is subject to a Code of Practice.

Further information on the NFI is detailed in the Cabinet Office's fair processing notice.

How we secure your data

Information system and data security is imperative to us to ensure that we are keeping your data safe.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape. In addition to this, we follow a defence in-depth security model, which means that your data is protected by multiple layers of security.

Personal information is stored and managed within a variety of IT software systems which are maintained to achieve a high level of security and confidentiality. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

Our employees complete mandatory information security and data protection training at the start of their employment, and annually thereafter to reinforce responsibilities and requirements set out in our information security policies. Only those staff members and third parties who require access to your information will be able to access it.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise the risk of unauthorised access or disclosure; when entering information on our website, you can check this is secure by right clicking on the padlock icon in the address bar.

Sovereign are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected.

How long do we keep your information?

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

We will usually keep:

- any application for accommodation for 6 years following acceptance of the offer of accommodation
- housing benefit notifications and rent statements for 2 years
- information on your tenancy file for 6 years following the end of your tenancy with us
- care plans and related documents permanently, or until transferred to a subsequent provider
- recording of calls from our Contact Centre for 30 days

Your rights

You have various rights in your personal data including the right in certain circumstances:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data unless there is a compelling reason for its continued processing, for example if we are required to retain it for statutory purposes, or to protect our legal interests
- to restrict our use of your personal data (i.e. permitting its storage but nothing further), although in some cases we will not be able to restrict our uses of your information, for example if we are required to process it for statutory purposes or to protect our interests
- to object to certain ways we use your information
- not to be subject to decisions made automatically through the use of technology and with no human consideration where it produces a legal or similarly significant effect on you
- to request that we transfer your information directly to a new landlord or other third party.

Further information about your data protection rights appears on the Information Commissioner's website at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like further information or to exercise any of these rights, please contact us

Complaints or concerns

If you are unhappy with our use of your personal data, or anything in this notice, please talk to us directly so we can help to resolve any problem or query

You also have the right to raise any concerns with the Information Commissioner's Office (ICO). They can be contacted by post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By calling 0303 123 1113 or by email casework@ico.org.uk

Their website is www.ico.org.uk

Changes to our privacy notice

This privacy notice was last updated in May 2018 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.

Modern slavery statement 2017

Our Business and Organisational Structure

Sovereign is a social business and one of the largest housing associations in the country. We provide over 55,000 homes for around 130,000 people in housing need across the south and south west of England and the Isle of Wight. Sovereign Housing Association is a Registered Provider of Social Housing registered as a society under Cooperative and Community Benefit Societies Act 2014 with the FCA (7448) and with the social housing regulator, the HCA (4837).

Our values

- (i) **Can Do**; we are a "Can Do" team of people who deliver on our promises and maximize our impact.
- (ii) **Creative**; we aim to be smart in the way we do things, to challenge 'the norm' and to think and do in new and creative ways.
- (iii) **Collaborative**; We work together with our residents, and with partner organizations to come up with solutions that are shared and inclusive.
- (iv) **Responsible**; we are a robust, long term business, rooted in the communities in which we work.

For more information about Sovereign Housing Association please go to our website www.sovereign.org.uk

Procurement and Supply Chains

Sovereign has an annual expenditure on goods, works and services of circa £150m. The way we manage our procurement and supply chain is increasingly important to our financial viability, reputation and corporate social responsibility objectives. We recognise that good procurement practice can directly enhance our business performance by securing best value goods and services against favourable commercial and contractual terms.

Sovereign is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our supply chains include sourcing of goods, services and works for the delivery and maintenance of quality homes.

To reflect recent changes in Government guidance on the pre-qualification of suppliers in a tender process, we have updated our tender questionnaires to the Standard Selection Questionnaire, aligned with the UK Public Contract Regulations 2015.

Parts 1 and Part 2 of the Standard Selection Questionnaire list the exclusion grounds that apply to public procurements above EU thresholds, and the statutory guidance states that the selection questions in Part 3 should be adopted across all procurement procedures and embedded as needed into procurement processes. As such Sovereign has adopted the standard Selection Questionnaire structure as a starting point to develop questions in the tender documents for lower value procurements. Part 3 (Selection Questions) includes a section specifically on the Modern Slavery Act 2015 and a declaration to be completed by potential suppliers.

The standardised pre-qualification questionnaire developed by the BSI for construction tendering

(PAS91 PQQ) is used in works contracts above the relevant OJEU threshold. The BSI are updating PAS91 to reflect the 2015 Regulations so until the new version is published, as part of Sovereign's due diligence processes into slavery and human trafficking, specific questions will be included in all tenders to confirm bidders' commitments to ensuring that there is no modern slavery or human trafficking in Sovereign's supply chain. This will include a Bidder declaration and potentially the submittal of associated policy / statement depending on the suppliers' annual turnover

Policy Statement on Slavery and Human Trafficking

Sovereign is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. We hold ourselves and our supply chain accountable and we fully comply with the provisions of the Modern Slavery Act 2015.

We recognise that modern slavery can exist in a complex supply chain issue, and we work in partnership with our Customers, Suppliers, with National Government Organisations and agencies as well as other organisations to help develop long-term solutions to this issue.

We have rigorous Human Resources procedures in place to ensure that all employees have a legal right to work in the UK, are paid a fair and legal wage, and are under no duress.

Our social purpose and commitment to preventing slavery and human trafficking are also reflected in our Safeguarding and Procurement Policies, to underscore the seriousness of slavery and human trafficking and ensure that staff are aware of and responsive to the issues. We have an open accountable culture and if slavery and safeguarding issues emerge, these are reported through standard management processes, the Safeguarding Reporting process or through our Whistleblowing process.

Sovereign Housing Association and its subsidiaries will not support or deal with any business knowingly involved in slavery or human trafficking. The Board of Directors and all senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

In terms of oversight, procurement and compliance are reviewed by the Audit and Risk Committee of the Board regularly. This policy statement will be reviewed by the Board annually and published.

Supplier Adherence to our Values

Sovereign has zero tolerance to slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

Training (L&D)

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our procurement and supply chains within our business, we will aim to provide training to relevant members of staff.

We also provide training to our frontline staff to help them identify potential cases of slavery and human trafficking and how to report them.

Future Action

During this financial year Sovereign Housing intends to further expand the steps it takes to combat modern slavery and human trafficking as follows:

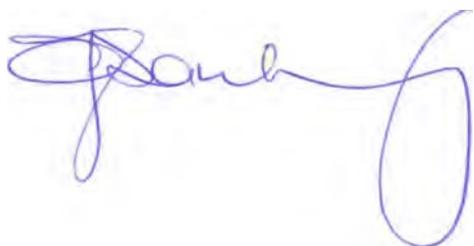
- Work is in progress to ensure that incumbent suppliers across the organisation, including subsidiaries, have an up to date declaration and Modern Slavery Policy in place dependent on turnover thresholds (Global annual turnover in excess £36m). Part of the Supplier OnBoarding and onward Contract Management process will ensure the assurances in place in respect of modern slavery and human trafficking issues are up to date, declared annually and maintained through the life of the contract.
- An online training programme about how to identify and report slavery and human trafficking is being developed and will be available for all staff

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year ending 31 March

2017.

Date of Board Approval: 18 May 2017

Director Signature:

A handwritten signature in blue ink, appearing to be 'James', written in a cursive style.