

BCHG PRIVACY NOTICE

1. Overview

Black Country Housing Group (BCHG) respects an individual's right to data privacy and data protection in line with data protection legislation. By this we mean the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Notice explains how BCHG will **collect, store, use, share and protect your personal information**. If you have a tenancy or receive a service from us, other documents may contain additional details about our processing of your information.

2. Who are we

We are Black Country Group Ltd, 134 High Street, Blackheath, West Midlands, B65 0EE, also known as Black Country Care, and Black Country Homeforce, and in this document, we're referred to as 'BCHG'. BCHG is a housing, social business, and social care organisation. This privacy notice describes how BCHG collects and uses personal information about you. It **applies to all services** where we collect your personal data.

BCHG is a 'data controller' of your personal data. This means that we are responsible for deciding how to hold and use personal information about you. It is important that you read this notice so that you are aware of how and why we are using such information. BCHG also provides some services on behalf of other organisations as part of grant or charity initiatives and acts as a 'data processor' on their behalf.

If you have any concerns about this Privacy Notice or how your data is processed you can **contact our Data Protection Officer (DPO)** by writing to the above address, or by emailing data@bchg.co.uk.

3. Why do we process personal information?

We use personal data primarily to help us manage and improve our services and our relationships with our customers, colleagues, and other stakeholders; and to adhere to any statutory duties required of us.

As a customer, we process your personal data for the following reasons:

For entering and for the performance of your tenancy agreement (which is a legal contract), service agreement or, home purchase and to comply with our legal obligations to provide appropriate homes.

- Managing rental applications, allocating rental homes, including home exchange and tenancy succession,
- Managing shared ownership enquiries and selling shares in shared ownership homes,
- Providing and managing our services and completing our administration duties,
- Supporting your tenancy or service and contractual relationship with us including property management, maintenance, and repairs,
- Monitoring defects, assessing any health & safety risks, administering tenancies and security,
- Resolving issues that you may experience with your home or neighbourhood,
- Managing financial arrangements related to your home or service, such as enabling automatic payment through direct debit or benefit payments or dealing with any mortgage arrangements or solicitors.
- In assessing suitability in housing applications,

- For referral to other services which may support you and your tenancy.

For legitimate interests to run our business effectively and continually improve our services where there is a legitimate need and a balancing test shows that the organisation's interests are not outweighed by your rights and freedoms. Examples include:

- Helping set up your council tax payments,
- Managing general enquiries and complaints,
- Collecting and acting on feedback,
- Carrying out your wishes or requirements such as any religious or cultural wishes.

We may also process your personal data under recognised legitimate interests without a separate balancing assessment under the Data Use and Access Act, for processing such as:

- direct marketing.
- intra-group administrative transfers.
- fraud prevention.
- public security and safety.

To comply with laws or regulations, and in exceptional circumstances to protect the vital interests of individuals.

- Enabling our staff to provide services in a way that protects their own safety and other people's safety, and to protect people where necessary,
- Dealing with any medical or similar emergencies.

For acting in the public interest, and substantial public interest.

- Involving agencies such as Social Services or the Police as appropriate where we have concerns about a person's health or welfare,
- Preventing and investigating anti-social behaviour, fraudulent activities, other crimes and protecting the welfare and security of people and property,
- For the purposes of crime detection, prevention measures and provision of safer communities,
- Carrying out meaningful equal opportunity monitoring and reporting and helping support equality of treatment and opportunity, including in relation to customers with disabilities.

4. Automated Decision-Making

We do not currently use automated processing to make decisions that significantly affect you. We do however use rules-based system automation, this is used to suggest actions or decisions which are then reviewed and controlled by a person, or to send communications such as appointment confirmations and reminders. Should automated processing to make decisions that significantly affect you, such as prioritising maintenance or assessing eligibility for certain services, be considered in the future, we will provide clear explanations of the decision-making process; and offer the option for challenge, representation and human review of decisions.

5. What personal data does BCHG collect?

We aim to limit the amount of information we process to which is necessary to provide you with our services and carry out our responsibilities. We typically collect data about you, including where applicable:

- Identification and contact details, including: your name, address, email, and telephone

number; previous names and addresses and forwarding contact details; date of birth, marital status, nationality, residential status, National Insurance number, photograph, and other proof of identity. Proof of housing eligibility, including interest or equity in another property; your housing history and information relating to your financial circumstances; details of family and next of kin including details of all household residents.

- Special Category Data, including race; ethnicity; religion; health; physical or mental health needs and other sensitive data including gender; income and outgoings; and bank details.
- Medical information & emergency contact details, next of kin / advocate, information about any accidents or incidents which involve you, your service, or your home.
- Financial information, including income details, bank details, housing benefit or care funding information, credit checks, and any guarantor details. Rent and service charge or payment information, including details of any arrears.
- Records of you/your representative's contact with us, over the phone, in person or digitally.

This includes contact with us via WhatsApp, where you choose to communicate with us via this platform. Audio of phone calls may be recorded to assist in quality monitoring; to investigate and resolve a complaint; for the detection, investigation and prevention of crime (including fraud).

- Current/previous details about your mental capacity, mental and physical health; offending and anti-social behaviour background.
- Information about any complaints made by you or which relate to you; a list of those external statutory and/or voluntary agencies you are engaged with; home/service feedback and satisfaction information. We may use your data for research or service improvement purposes, including under broad consent. Where it is impracticable to issue new privacy notices, we may publish aggregated outcomes instead, ensuring appropriate safeguards are in place.
- Online account login and verification information, if you have set up an online account.
- Where CCTV is installed, images are captured for the prevention, detection and investigation of anti-social behaviour and crime. These images are only shared with law enforcement or prosecution agencies where it is believed the images will assist in a legal enquiry. CCTV images, not subject to an investigation, are held for a maximum of 31 days (about 1 month).
- Where environmental sensors have been installed in a property to help diagnose, prevent and monitor damp, mould and condensation in a property, environmental data from your home, such as temperature; humidity; air quality; energy consumption, will be processed by BCHG. Whilst this is not personal data, it can indicate personal household information such as number of occupants.
- On occasion, when investigating an Anti-Social Behaviour complaint, sound monitoring equipment may be used to detect excessive noise coming from one of our properties. All sound recordings are destroyed once the Anti-Social Behaviour case is closed.
- We will collect information relating to any relevant criminal convictions from housing applicants, to ascertain whether they are unsuitable to be a tenant in a property by reason of its position, their behaviour or the behaviour of a member of their household.
- The national data opt-out gives everyone the ability to stop health and social care organisations from sharing their confidential information for research and planning

purposes. It is a legal requirement for all health and social care CQC registered organisations, such as us, to be compliant with the national opt out Policy. At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all the confidential customer information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>.

6. Where does BCHG collect this personal information from?

We collect and /or validate this information from the following general sources:

- From you directly and from any family members or beneficiaries of products and services.
- From third-party organisations, who transfer your personal information to us when BCHG operates a service that the third party previously operated or where they make referrals to our services.
- From the independent social and market research agency TLF Research we have engaged to conduct satisfaction surveys on our behalf.
- From environmental sensors installed in your property, where deemed necessary.
- From trusted external sources such as Fraud Prevention Agencies, Credit Reference Agencies, the Department of Work and Pensions, National Health Service, Local Authorities, Her Majesty's Revenue and Customs and organisations to assist in the detection and prevention of crime, including police and law enforcement agencies.

7. Data Sharing

We may have to disclose personal information about you to comply with applicable laws or other lawful requests. Depending on the service you receive, we also share information with:

- relevant regulators and/or commissioners.
- external agencies or third parties that are involved in any coordinated services that you receive and require your personal details to do so (such as contractors for repairs, planned maintenance, refurbishment of properties; or software companies supporting systems on which personal data is held, the legal basis in such instances is that it is necessary to carry out a contract).
- government or other statutory agencies to help you with benefit claims and any tenancy issues, and to help them to fulfil their public tasks. This includes Social Services, local authority council tax and benefits departments, the DWP (Department for Work & Pensions) and HMRC (HM Revenue & Customs). We may share information with DWP if you are in receipt of Universal Credit and have significant arrears, to make a request for your housing benefit to be paid directly to us.
- If you have breached your tenancy contract and now owe us money, we may make a referral to our internal debt and welfare advisors who can help you with any monetary management issues you have. We may also share your data with tracing agencies for the purpose of seeking payment or repaying you if you are in credit. Tracing agencies are only used in extreme cases and after any risk has been assessed.
- We will share your information with third parties including the Police, other law enforcement agencies, and have an active Information Sharing Agreement with West Midlands Police. We will also share your information with the emergency services, lone working service providers, and support service providers to prevent or detect a crime, where we believe the health & safety of an individual is at risk.

- We have Data Sharing Agreements in place with Local Authorities where applicants are nominated for vacant properties as part of a Nominations Agreement and will share information with Local Authorities in relation to any fraud prevention/detection work they carry out.
- Where we are providing you with debt advice, we may share your details with other debt advice agencies to provide that service. With your permission, we will also contact your creditors, DWP, HMRC, HMCTS, the local authority, other advice services, charities, and schools.
- We will work in collaboration with other agencies, for example healthcare providers, law enforcement agencies, charities and third sector, to provide our customers with a more complete and coordinated service and will share your personal data with them to enable you to access services or benefits you have identified you need.
- Where we receive a one-off data request from another public body or another data controller for their own legitimate interest. (e.g., a utility company requesting forwarding details of a tenant to recover debts owed), we will usually provide your new address but only if we believe it is up to date and it is less than 12 months old.
- Where we use trusted identity verification services or participate in national smart data schemes, this is done in accordance with the framework established by the Data (Use and Access) Act 2025.

All personal information is held securely and only accessed by colleagues with a legitimate business interest in accessing it. BCHG does not currently transfer any personal data outside of the UK. If BCHG were to transfer data outside the UK, we would ensure the necessary safeguards are in place, these would ensure that these are not materially lower than UK standards.

8. How does BCHG protect personal data?

BCHG has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed. We limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate business need to access it and will ensure your data is secured by processors, ensuring requirements are incorporated into contracts or Data Sharing Agreements. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so, or we believe it is important to tell you about a breach even if we are not legally required to tell you.

9. For how long does BCHG keep personal data?

Unless we inform you otherwise, we will hold your personal information based on the following:

- for as long as we have reasonable business needs, including managing the service(s) we provide to you.
- retention periods that are in line with legal/regulatory requirements or guidelines. Please see our [Data Retention and Disposal Policy](#) and appendices for more information.

10. Your rights under data protection laws

You have several rights over how we process your personal data. They are listed below. If you wish to use any of them, please contact us, and we will explain to what extent your request is valid and how we will respond to it.

Your right of access	You have the right to ask us for copies of your personal information. We will conduct a reasonable and proportionate search to locate your information. We may pause the response period while awaiting clarification, extend the response time by up to two months for complex requests, and charge a reasonable fee for manifestly unfounded or excessive requests or additional copies.
Your right to rectification	You have the right to ask us to correct personal information you think is inaccurate. You also have the right to ask us to complete any of your information you think is incomplete.
Your right to erasure (to be forgotten)	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 complain to the controller	You have the right to complain to us as the data controller about the processing of your personal information and may escalate your complaint to the ICO if unhappy with the response.

Generally, you are not required to pay any charge for exercising your rights, however if a request is manifestly unfounded or excessive, or requires additional copies of information, we may charge a 'reasonable fee' for the administrative costs for complying with the request or we may decline to fulfil the request. If you make a request, we will aim to respond to you in one month. We may need to request specific information from you to help us confirm your identity so that you can exercise any of these rights, this is a security measure to ensure that personal information is only disclosed to the person who proves that they have a right to access it.

Please contact us at data@bchg.co.uk or write to Data Protection Officer, Black Country Housing Group, 134 High Street, Blackheath, West Midlands, B65 0EE, if you wish to make a request.

11. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for unrelated purposes, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

12. Changes to this Privacy Notice

We may change this privacy notice occasionally to reflect changes in the law and/or in our privacy practices. You will be able to access the latest privacy notice via our website.

13. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at: data@bchg.co.uk or write to Data Protection Officer, Black Country Housing Group, 134 High Street, Blackheath, West Midlands, B65 0EE, if you wish to make a request.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk