

COVID-19 Privacy Statement

Version: 3

Last Updated: 14 July 2021



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1. Introduction

This policy describes how Connect Housing Association may handle your data in relation to the current COVID-19 public health crisis.

2. About us

In this notice, whenever you see the words 'we', 'us', 'our', or 'Connect Housing Association', it refers to Connect Housing Association. Our ICO registration number is Z5633639.

We are a Registered Social Landlord (RSL) regulated by the Regulator of Social Housing with registered office at 205 Roundhay Road, Harehills, Leeds, LS8 4HS

3. Questions relating to this document

If you have any questions in relation to this document or how we use your personal data they should be sent to: hello@connecthousing.org.uk; or the Senior Manager Business Assurance, Connect Housing Association, 21 Bond Street, Dewsbury, WF13 1AX

4. Scope

This privacy information is applicable to employees and contractors, customers, and other individuals we may come into contact with or who use our services or visit our premises.

5. Personal data processed in relation to COVID-19

Connect Housing Association collects, stores, and discloses information in relation to the COVID-19 epidemic for the following purposes:

1. Safeguarding the health and safety of our staff and customers
2. Providing care and support to our tenants who may need it
3. Safeguarding the most vulnerable among us and helping everybody comply with government guidelines in the current context
4. Profiling, modelling and analysis

In order to fulfil the above purposes we may need to process information about you including: your name, address, contact details, information relating to your health (including for example reports of infections, testing, and medical conditions including mental health) information and details of your movements (including for example recent travel, associations with others, compliance with government "lock down" and isolation instructions). Personal data relating to these categories will be sourced directly from you as the data subject in most cases. In very limited circumstances we may be informed of an individual's COVID status for example by a support agency.

The table below illustrates how we use the information we collect in relation to COVID-19 including the lawful grounds for processing.

Relates to	Purpose	Lawful basis
Employees, customers, others	Disclosing information requested by health professionals or other public services in connection with the pandemic	Art. 6 (1) (f): GDPR: for the purposes of legitimate interest. Art. 9.2 (i) GDPR: Public interest in public health
Employees, customers and contractors	Record and disclose positive COVID status or need to self-isolate to ensure the health and safety of our customers employees and contractors.	Art. 6 (1)(c) GDPR: Compliance with a legal obligation Art. 9.2(b) GDPR: Statutory requirement as an employer: Health and Safety at Work Act 1974
Employees and customers	Monitoring the equality of opportunities of individuals	Art. 6 (1) (f) GDPR: for the purpose of our legitimate interest Art. 6 (1)(c): compliance with our legal obligations; Art. 9 (g): Reasons of substantial public interest: Equality of opportunity or treatment.
Employees and those for whom we have a duty of care	Monitoring the health of employees and preventative medicine.	Art. 6 (1) (c) GDPR: compliance with legal obligations as an employer Article 9.2(h) GDPR: Health and Social Care.
Customers in Supported Housing	Monitoring behavioural compliance and vaccine status	Art.6 (1) (f): Legitimate interest Art. 9 (2) (i): reasons of public interest in the area of public health
Employees and customers	Referrals to support systems where there is a need for social care.	Art.6 (1) (f): Legitimate interest Article 9.2(h) GDPR: Health and Social Care.
Employees, customers and their families, neighbours and friends	Safeguarding Individuals at heightened risk from the epidemic.	Art. 6 (1) (c): Compliance with legal obligations: Data Protection Act 2018, Schedule 2 Para. 18: Safeguarding Children and Vulnerable Individuals. Article 9.2(h) GDPR: Health and Social Care.

Retention periods for information held are outlined in Connect's Data Retention Policy.

6. Consent

Please note that it is not our intention to base processing of personal data or special category personal data on consent for a number of reasons. It is not practical for us to obtain consent in these current circumstances and in reality the processing of personal data for COVID-19 purposes is in the public interest and not optional. You have the right to object to our processing of your personal data for COVID-19 purposes.

7. Data sharing and disclosure

Connect Housing Association may share data with the following categories of recipients in line with the purposes and lawful bases for processing outlined above:

1. Health professionals, health care services, and occupational health providers
2. Social care services and social care professionals
3. Police and law enforcement services
4. Our contractors and other organisations we may ask to visit our premises
5. Connect employees or customers where we believe there is a risk to them and the disclosure of information to them outweighs the other individuals' rights to privacy in relation to their COVID-19 status and/or behaviour (such as compliance with government restrictions).

Wherever possible data will be anonymised.

8. Profiling

Connect Housing Association may undertake basic profiling to build up a picture of some data subject's travel patterns and health conditions in order to determine whether they may be subject to government guidelines in relation to COVID-19 and to inform our broader decision making and response to the COVID-19 pandemic.

9. International transfers

Connect Housing Association does not transfer any personal data relating to the Coronavirus pandemic outside of the United Kingdom.

10. Secure storage of data

All personal data is stored in secure Connect Housing data centres.

11. Your rights

You have the following rights concerning your personal data. If you wish to exercise any rights specifically in respect of COVID-19 please specify that in your request so that we are able to respond as quickly and effectively as possible.

Right of access	You have the right to obtain confirmation from Connect Housing Association as to whether or not personal data concerning you are being processed, and, where that is the case, access to that
Right to rectification	You have the right to require Connect Housing Association to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige Connect Housing Association to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige Connect Housing Association to restrict processing of your personal data for certain purposes. For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances, but not all) to oblige Connect Housing Association to provide you with the personal data about you which you have provided to Connect Housing Association in a structured, commonly used and machine-readable format. You also have the right to oblige Connect Housing Association to transmit those data to another controller.
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 that the processing of personal data for COVID-19 purposes is not generally based on consent.
Right to object processing	You have the right to object to processing based on our legitimate interests or where we state that the processing is undertaken pursuant to our fulfilling a task in the public interest.
Rights in relation to automated decision making	Connect Housing Association may perform automated decision-making based on personal data such as profiling and analysis. The results of that decision making may mean that we initiate certain interventions (e.g. reporting you to the Police for breaking the lock down rules or referring you to a health or social care professional where we believe it is in your interests).

Please direct any requests to the Senior Manager Business Assurance:

Email: hello@Connecthousing.org.uk

Postal address: Connect Housing Association, 21 Bond Street, Dewsbury, WF13 1AX

12. Your right to lodge a complaint

If you wish to exercise any of your rights concerning your personal data, you should contact Connect Housing Association's Data Protection Officer at the address shown

above. If you are not satisfied with the response you receive you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is:

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

(t) 0303 123 1113
 (e) casework@ico.org.uk

13. Document Owner and Approval

Connect's Senior Manager Business Assurance owns this template and is responsible for ensuring that it is reviewed on a regular basis.

A current version of this guidance is available to all employees on the organisation intranet.

This guidance was approved by the Chief Executive Officer on 14/07/2021 and is issued on a version-controlled basis under their signature.

Signature: *Helen Lennon*

Date: 16/07/2021

Appendix:

A: Version History

Issue	Description of change	Approval	Date of issue
1.0	Initial issue	CEX	28/05/2020
2.0	Minor amends, updated branding	CEX	01/03/2021
3.0	Minor amends	CEX	14/07/2021