Privacy notice for the Resident Panel

The Housing Ombudsman Service set up its Resident Panel so that social housing residents could be involved in the development of our service and tell us about their own experiences of complaining to their landlord and accessing our service.

This Privacy Notice is to let applicants and members of the Housing Ombudsman Resident Panel know how we process personal data.

Why we collect personal information from you

We collect and process personal data about you to administer your participation in the panel. This includes:

- reviewing applications to join the panel
- corresponding with you about upcoming meetings
- recording attendance at panel meetings
- video recordings of virtual meetings
- sending you documentation such as meeting minutes or presentations
- sending you questionnaires or surveys to complete as a panel member
- Provide a tailored and enhanced service to you through the use of analytics

Personal data we collect about your protected characteristics will assist us to make sure that the current and future panel is representative of the diversity of social housing residents across England.

It will also help us to ensure we implement any adjustments you need to attend the meetings.

On what basis do we process personal information?

We process your personal information to assist our public task duties in improving complaint handling across the social housing sector and developing accessibility of The Housing Ombudsman Service.

Our lawful basis under the UK GDPR for this purpose is Article 6(e) which states processing is necessary for the performance of a task carried out in the public interest. This is to administer the Panel's activities and to comply with the Equality Act 2010.

The lawful basis we rely on to process personal information about you which is defined as 'special category' data under the UK GDPR is Article 9(g) which is for purposes of substantial public interest to promote the equality or opportunity of treatment.

What personal information do we collect about you?

We only collect personal information directly from you which is necessary and relevant to the purposes of the panel.

Through the applications process, we will collect the following personal details:

- name
- contact details
- age range
- gender
- geographical location
- tenancy Information
- skills and experience

Special Category Data

- ethnicity
- health data (through reasonable adjustments requirements)

Access to this personal information is restricted and is used for internal analytics use only.

We also collect information about your engagement with our email communication. We collect your:

• Browser User Agent such as Safari, Firefox, Edge.

- IP Address for estimated location.
- Date and time associated with each open and click for an email.

We collect and store this information when we correspond with you via our third party mailing system GovDelivery which is provided by Granicus.

For more information on analytics data and GovDelivery, please see the 'email Analytics Data' section at the end of this privacy notice.

Who do we share your information with?

We won't share your personal information with other organisations for marketing, market research or commercial purposes.

We will share you personal information with organisations that provide services to us to enable us to administer the panel's activities, however we will not share your sensitive or special category data unless you volunteer this information, for example, if you discuss your disability or reasonable adjustments on a Zoom video call.

We are obliged to consider one off disclosure requests where exemptions in the Data Protection Act allow for this. These can include:

- Requests from law enforcement agencies where the information is required to prevent and detect criminal activity or apprehend and prosecute offenders
- Requests from Legal representatives where the information is required to facilitate legal claims or the obtaining of legal advice
- Requests from individuals relating to their rights of access under the Data Protection Act
- Requests from agencies involved in safeguarding where the information is required to protect children and vulnerable adults.

In each case, disclosure will be considered on a case by case basis and a proportionate response provided.

How we store and how long we keep personal information

We only store your personal information for the length of time we need it for.

We will store and retain your personal information for 3.5 years. This is the length of the panel term plus 6 months.

Unsuccessful applications to join the panel will be stored for a period of 6 months from the closing date of the application period.

Information may be anonymised and used for statistical purposes at the end of the retention period.

Your personal information will be stored securely on The Housing Ombudsman Service systems with the necessary access restrictions in place.

Meeting recordings

The panel is required to meet virtually in full at least twice per year. We may choose to record some meetings for the purposes of administering the current and future panels. The image and voice of the presenters will be captured and if you actively contribute to a meeting which is recorded then your image and voice will also be captured. These recordings will only be used internally.

You will be informed the meeting is being recorded as early as possible and at least before the recording starts.

We use Zoom as a platform to deliver virtual meetings. Zoom are a third-party supplier and are a global organisation, therefore your personal data may be transferred outside of the EEA.

Zoom Video Communications, Inc. are registered under the UK-US Data Privacy Framework which aims to provide an adequate level of protection to data transferred to the United States.

You can view how Zoom process personal data by viewing their Privacy Notice.

Email analytics data

We use GovDelivery to send email bulletins and updates on the Resident Panel activities to panel members in line with our legitimate interest to effectively manage communication and obtain engagement insights.

Emails sent from GovDelivery contain web beacons which capture data about your interactions with the email. For example, when you open an email and click a link, this information will be recorded on an individual basis.

We use this information to analyse and understand how our emails are interacted with, and to inform and improve future communications with you as a panel member to promote the service and requirements of your membership.

Analytics data is stored for each email campaign directly on GovDelivery. Data access is restricted and is only accessible to the Communications Team within HOS for a period of 12 months.

Granicus employees can also access the information for support purposes and store your information for a period of 6 years after you are removed from the platform.

To view more on how this information is collected, used and stored by GovDelivery, see their <u>Privacy Notice</u> and <u>Cookie Statement</u>.

Your legal rights

Under data protection laws you have rights in relation to the processing of your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights on the '<u>Your rights</u>' page of this Privacy Notice.

If you wish to exercise any of these rights, please contact the Data Protection Team at DPO@housing-ombudsman.org.uk

If you are not happy with any aspect of how we collect and use your data, you have the right to complain independently to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). However, the ICO can choose not to progress your complaint if you have not first contacted us to attempt to resolve the issue.

Contact details for the Data Protection Officer:

Data Protection Officer

Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET

Telephone: 0300 111 3000

Email: dpo@housing-ombudsman.org.uk