



Aspire Housing Privacy Notice

We are committed to ensuring that the personal data of our customers is handled in accordance with applicable UK data protection legislation including, but not limited to, the UK General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (the DPA). This privacy notice tells you what to expect when Aspire Housing collects personal information about you. **It applies to applicants for housing, tenants and members of their household, former tenants, visitors to our properties and schemes and visitors to the Aspire Housing Website.**

From time to time, as our organisation evolves and develops, we may update and make changes to this privacy notice.

This privacy notice was last updated in **January 2025**.

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Who we are

ASPIRE HOUSING LIMITED is registered as a Data Controller with the Information Commissioner (registration number Z7678641). Our Registered Office is Aspire Housing, Kingsley, The Brampton, Newcastle-under-Lyme, ST5 0QW Telephone: 01782 635200

ASPIRE HOUSING LIMITED is a leading housing provider, place shaper and property developer. We are a financially strong business. Profits are reinvested in new homes, in revitalising communities and in a comprehensive range of innovative support services, designed to transform lives. ASPIRE HOUSING LIMITED own the trading name Cerris Homes.

ASPIRE HOUSING LIMITED is a Registered Society under the Co-Operative and Community Benefit Societies Act 2014 with number 31218R. We are also authorised by the Financial Conduct Authority to provide Debt Counselling & Debt Adjusting (FCA registration number 672504).

How do we get your information?

We get information about you from the following sources:

- Directly from you.
- Local Authorities, such as Newcastle Housing Advice and Cheshire East Council, who refer housing applications to us.
- Police
- Referees you provide, previous landlords and employers.
- Social workers, medical professionals, credit reference agencies and mortgage lenders who provide us with information relevant to your housing application and housing needs.
- The Probation Services
- Support Workers
- Aspire Housing employees and contractors who deal with you.
- CCTV images that we operate at our offices, residential blocks and community schemes.
- Key fob usage of communal entrances in residential blocks.

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

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, online application forms, questionnaires, and text messages.

Why we process personal data and the lawful basis we rely on

Housing Applications

To prioritise and assess housing applications, eligibility, and complete tenancy sign-ups. The lawful basis we rely on for processing the following personal data is article 6(1)(b) of the GDPR, **processing necessary to Perform a Contract** or to take steps at your request, before entering a contract.

We will need your name and contact details (including telephone numbers, email addresses and details of anyone you may choose to represent you) for use across the organisation and by our contractors, suppliers, and partners. We will collect detailed personal information about you and other household members, including previous addresses, age, date of birth, National Insurance number, income and benefits details, employment status, relationship status, nationality, caring responsibilities, and bank details.

We will also collect information about any disabilities, any communication and accessibility requirements and medical information relevant to your housing needs. Please see the section below headed Special Category Data for more information.

We process data about criminal convictions and offences with your consent under article 10 of the GDPR and the DPA 2018, Schedule 1, Part 2 and Part 3.

If your application for housing is successful, we are legally obliged to share your details about your background, but not your name with the Department Levelling Up, Housing and Communities. You can read about how they process your information here; [CoRE Privacy Notice](#)

Managing Tenancies

To manage your tenancy, we continue to rely on the lawful basis of the processing being necessary for **Performance of a Contract**, article 6(1)(b).

We need up to date contact details (telephone number and email address) so we can reach you when we need to discuss issues pertaining to your tenancy, e.g. rent collection, access for maintenance, repairs and improvements, if we need to arrange a home visit or to contact you in the event of an emergency or to enforce the terms of your tenancy. We keep details relating to the repair, maintenance, and servicing such as gas & electricity inspections of your home (although this information will not necessarily constitute your personal data).

Financial records about the amount of money you have paid us, any amount(s) outstanding and associated recovery action. Depending on the method of payment, we may hold your bank account details.

We would like to keep records of your circumstances up to date and ask that you help us to do this (e.g. if you have a medical need that means your housing requirements need to be re-assessed we would ask for supporting information about your change in health needs) or to effect any changes to your tenancy (e.g. if you want to change your name on our records we ask for a copy of your marriage or deed poll certificate).

We carry out the following processing because it is in our **Legitimate Interest** (article 6(1)(f)) to provide the best service we able

We will use your contact information to tell you about changes at Aspire Housing that effect you.

We will hold records of all our contact with you, and any contact from third parties representing you or about you. This may include call recordings, online chat, and SMS messages.

We are under a **Legal Obligation**, article 6(1)(c) and there is often a public interest in carrying out a **Public Task**, article 6(1) (e) of the GDPR, to carry out the following processing.

To prevent fraud and illegal sub-letting and to confirm your ongoing eligibility for housing. To investigate and resolve complaints or housing management issues such as Anti-Social Behaviour which may result in us collecting relevant information about you.

Enhanced and Intensive Housing Management Services

Tenants of our Community Living schemes who require support maintaining their ability to live independently may sign an Enhanced Housing Management Agreement. Tenants in individual properties may sign an Intensive Housing Management Agreement. This is a separate document from the Tenancy Agreement. We process information to provide this service under article 6(1)(b), **Performance of a Contract**.

Money Advice and Employment and Skills Support

We have a Money Advice Team and an Employment and Skills Support Team who support Tenants and members of the public that voluntarily engage with the services. We process this information under Article 6(1)(a) **Consent**.

Special category data

We routinely process the health data of housing applicants, tenants, and residents where it is relevant to their housing needs and the provision of our services. We rely on GDPR Article 9 2(b), and the Data Protection Act (DPA) 2018 Schedule 1, Part 1 (1) (social security and social protection).

Our Wellbeing, Adaptations, Intensive Housing Management and Independent Living teams rely on your Consent and, where appropriate, Article 9 2(b) or (h) and the DPA 2018 Schedule 1, Part 1 (1) (social security and social protection) or Part 1(2) (health and social care).

When we deal with antisocial behaviour complaints, we will process special category data under Substantial Public Interest (GDPR Article 9 (g)) and the DPA 2018 Schedule 1, Part 2 (10) (Preventing or detecting unlawful acts).

We also collect faith, race and sexual orientation data to monitor equality, diversity and inclusion to help ensure our services are delivered fairly. The lawful basis we rely on to process this information is Consent and the DPA 2018, Schedule 1, Part 2 (8) (Equality of opportunity and treatment).

We collect information that you provide about criminal convictions and offences so that we can safeguard our employees and the communities where we are the landlord. The lawful basis we rely on to process this information is Employment and Social Protection Law (GDPR Article 9 2(b)) and Substantial Public Interest, 9 2(g)) and the DPA 2018, Schedule 1, Part 1 (Employment and Social Protection Law) and Part 2 (Substantial Public Interest)

The DPA 2018 requires us to have an Appropriate Policy Document (APD) for certain conditions of processing special category and criminal offence data. Our APD sets out and explains our procedures for securing compliance with the principles of GDPR and policies regarding the retention and erasure of such personal data.

The Noise App

The Noise App is a third-party application used to capture audio recordings. We use personal data collected through The Noise App to expediate investigations into noise nuisance and to determine whether the noise report is anti-social behaviour, domestic living noise or a statutory nuisance.

We carry out this processing because it is in our **Legitimate Interest** (article 6(1)(f))(or those of a third party) and your interests and fundamental rights do not override those interests (e.g. expediting investigations into noise nuisance)

Using The Noise App is optional. We will use the contact details of customers who choose to use The Noise App to contact them regarding their reports of noise nuisance.

Each report/recording consists of a 30-second recording of the noise nuisance that the customer is experiencing, including the type of noise, the location within the property where the recording was made, how much it is affecting them, and the noise source address/ location.

Once submitted, the information is forwarded to the relevant team dealing with noise nuisances for further investigation. Reports and recordings may be used as evidence in investigating and managing anti-social behaviour and statutory nuisances, including, where relevant, for legal proceedings.

Shared Ownership/Right to Buy

If you approach us regarding the purchase of a shared ownership property or you engage with us regarding Right to Buy entitlement the lawful basis, we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to **processing necessary to Perform a Contract or to take steps at your request, before entering a contract.**

Foodbank Referral

We also need to share some legal information with you so we're clear with you how we're sharing your information as part of this referral process.

Lawful basis for processing your information

We collect this information from you & pass it to our Foodbank partners with your Consent. You may have given this Consent over the phone to a colleague at Aspire Housing when discussing the Foodbank.

Who we share your information with

Newcastle & Staffs Foodbank uses the information we share to provide you with food and provisions. We have a written agreement with them to share data. They are a controller of your data. We generate the Foodbank voucher by entering your details into software hosted by The Trussell Trust who is a controller of the data you provide. This software has strong security measures to keep your information safe. The Trussell Trust supports a nationwide network of foodbanks and to provide emergency food and support to people locked in poverty.

Please see the links below for more information about the processing of your personal information.

<https://newcastlestaffs.foodbank.org.uk/privacy-cookies-policy/>

<https://www.trusselltrust.org/privacy/>

Customer Forum

As a customer, we may approach you to take part in our customer forum. We further process your information in relation to this as a **Legitimate Interest** to improve our services, Article 6(1)(f). Your participation will be for a specified period, and you may withdraw your consent at any time.

Security

We operate CCTV for the prevention of crime at all our office premises (both outside and inside), in the communal areas and entrances of residential blocks we own and manage and in public areas of retail and community schemes we manage.

If you are issued with a key fob to gain access to the main entrance of a block the key fob reference will be recorded against your name. The use of key fobs is recorded on a secure, computer-based system to manage the security of the building and the issuing of key fobs.

We carry out the above processing because it is in our **Legitimate Interest** (article 6(1)(f)) to secure our properties, and it is in the **Public Interest** (article 6(1)(e)) to prevent crime and anti-social behaviour.

Marketing

If you sign up for emails through our website, at an event or meeting, we will send you these until you withdraw your **Consent** (article 6(1)(a) of GDPR). You can do this by clicking on the unsubscribe link in each email or by contacting us.

If you are a Tenant, we will send you emails using our **Legitimate Interest** (article 6(1)(f) of GDPR). You can unsubscribe from marketing emails at any time. We may declare some emails or text messages as Service Messages which are not subject to marketing rules.

Customer Surveys

The Regulator of Social Housing (“RSH”) requires Housing Associations, like Aspire Housing, engage with customers regarding the delivery and performance of our services, as outlined in the Tenant Involvement and Empowerment Standard. We process this information based on **our Legitimate Interest** (Article 6(1)(f)). We have a legitimate interest to contact you and find out how we can improve our service through our customer surveys. Our legitimate interest includes contacting you to gather feedback through customer surveys to improve our services. Additionally, we aim to enhance our services and ensure the success of our organisation. We may email, text or call you to gather any information.

If personal information is not necessary, we’ll keep your response anonymous. For instance, in a survey, we may only collect your responses without needing your contact details. If we use your personal information for research and analysis, we’ll keep you anonymous unless you’ve agreed that your personal information can be used for that research.

Automated decision making and profiling

The GDPR has provisions on:

- Automated individual decision-making (making a decision solely by automated means without any human involvement).

- Profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

Aspire Housing analyse rent payment data to help understand which tenants are most likely to fall into arrears. This enables us to contact customers and help them manage their rent account and help them maintain their tenancy.

Sharing your personal data

In certain circumstances we may need to share your personal data with other organisations. When we share personal data to complete a task, we will only share the minimum personal data required to complete that task. Special categories of personal data are confidential and will only be made available to those who require it. We will never sell, rent or trade your personal data.

We will also pass your information on to third parties whom you may ask us to, for example if you ask us to put you in contact with professional advisors.

Who we share data with

We may share information about you with third parties including government agencies, independent regulators, and external auditors. Examples of who we may share your information with include but are not limited to:

- Business associates and professional advisers
- Charities and voluntary organisations
- Courts and tribunals
- Credit reference agencies
- Current, past or prospective employers
- Debt collection agencies
- Emergency services
- Health Authorities, Healthcare, social and welfare organisations, probation services
- Local and central government (we share data of Tenancy Applicants through CoRE, to the Department of Levelling Up, Housing and Communities).
- Housing Benefit and Universal Credit data with the DWP and the relevant Local Authority.
- Council Tax liability information with the local authority.
- Data about property sales with Homes England.
- Other landlords, housing associations and property exchange platforms
- Repairs and maintenance contractors (It should be noted that within the terms and conditions of your tenancy agreement it states that you will allow contractors of Aspire Housing access to your property to carry out repairs and maintenance).
- Survey and research organisations
- Police
- We may share information reported/recorded through The Noise App with Law enforcement and third-party suppliers providing our systems

Data Processors

Where we use data processors, we have a written agreement with them that ensures your data is protected and secure.

We have a legitimate interest to ensure utility bills are accurate and assigned to a new tenant. We use a utility broker as a single point of contact to liaise with tenants, Aspire Housing and the utility companies.

When you move into a WDH property we share your name, contact details and the start-date of your tenancy with the utility broker, Energy Angels (<https://energyangels.co.uk/>).

We use contractors to carry out property repairs and maintenance who we give your contact details so that they can liaise with you.

We use several technology data processors to store data, provide electronic communications, maintain CCTV and operate key fobs.

Data Security

We have put in place appropriate security measures to prevent your personal data from

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions. Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Retention of Data

We retain

- Unsuccessful tenancy applications for 6 months.
- Details of Tenancies for 7 years after the termination date.
- Recordings of calls to our contact centre for 40 days.
- CCTV recordings for 30 days.
- Noise App recording information for up to 2 years.

We may deviate from the above if

- We are legally required to retain information for longer.
- The information relates to a complaint.
- We are preparing information in relation to a legal claim.
- In certain cases, we may need to keep it for longer where an historic noise complaint is re-activated and/or information is needed for the purpose of legal proceedings

The above and all other information we keep, and how long we keep it for is defined on our retention schedule.

Your Data Protection Rights

Under data protection law you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

1. The **right to be informed** about how and why we gather your personal information, how we keep it and what we do with it.
2. The right to access the personal data we hold about you. This is also known as a 'data subject access request' (DSAR). There are some exemptions, which means you may not always receive all the information we process.
3. The **right to have the information rectified** if it is inaccurate or incomplete.
4. In certain circumstances you have the right to have your information erased from our records. You can do this where:
 - the information is no longer necessary in relation to the purpose for which we originally collected/processed it
 - you withdraw consent.
 - you object to the processing and there is no overriding legitimate interest for us continuing the processing.
 - we unlawfully processed the information.
 - the personal information has to be erased in order to comply with a legal obligation.

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- to exercise the right of freedom of expression and information
- to enable functions designed to protect the public to be achieved e.g. government or regulatory functions.
- to comply with a legal obligation or for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- archiving purposes in the public interest, scientific research historical research or statistical purposes
- the exercise or defence of legal claims; or
- where we have an overriding legitimate interest for continuing with the processing

5. The **right to object to processing** where we say it is in our legitimate interests. We must stop using the information unless we can show there is a compelling legitimate reason for the processing, which override your interests and rights, or the processing is necessary for us, or someone else to bring or defend legal claims.
6. You have the **right to restrict us from processing** your personal information. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we can store the information but not use it. You can do this where:
 - You challenge the accuracy of the information (we must restrict processing until we have verified its accuracy).
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - If we no longer need the personal data but you need the information to establish, exercise or defend a legal claim.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

If we have disclosed your personal information to third parties, we must inform them about the restriction on processing, unless it is impossible or involves disproportionate effort to do so.

7. Your **right to data portability**. This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
8. **Right to object to automated processing, including profiling** – you also have the right to object to being subject to the legal effects of automated processing or profiling.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex. In this case, we will notify you and keep you updated.

You can exercise any of your information rights by contacting the Data Protection Officer using the details provided in the 'How to contact us' Section. This can be a verbal request, in writing, via email or by completing our form. You may also ask someone to do this on your behalf. contact us by using the details below.

International Transfers

We will not transfer your personal information outside of the United Kingdom or European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. We will ensure that anyone we pass personal information to agrees to treat it securely and confidentially and to use or process it solely for the reasons it is provided.

Website Cookies

Cookies are small text files placed on your computer by the websites you visit. They are used to help make websites work efficiently. You can control cookies through the settings of your web browser. To find out more, visit www.aboutcookies.org or www.allaboutcookies.org.

These are the cookies we use when you visit our website:

- Google Analytics - to monitor website use and the type of browser that is accessing the website.
- AccessiBe - to remember a visitor's language preferences.
- Microsoft Clarity – to monitor website use and the type of browser that is accessing the website.

Complaints

If you have any questions about our privacy notice or information we hold about you, or you wish to make a complaint about how your personal data is processed by Aspire Housing, please contact the Aspire Housing's Data Protection Officer using the details provided below in the 'how to contact us' section.

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on 0303 123 1113 or through the website www.ico.org.uk

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Officer at Aspire Housing, Kingsley, The Brampton, Newcastle-under-Lyme, ST5 0QW.
- Telephone: 01782 635200
- Email: DPO@aspirehousing.co.uk

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.