

Southward Housing Co-operative Data Protection Policy	Author: MM Date: 23 June 2026 Approved by Committee: 07/07/2026
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1. Introduction

Southward Housing Co-operative (“the Co-operative”) is committed to protecting the privacy and security of personal information. We collect and process members’ personal data solely to fulfil our responsibilities as a registered landlord and to manage our housing services effectively.

This policy sets out how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all members, applicants, employees, volunteers, contractors, and third-party service providers who handle personal data on behalf of the Co-operative.

2. GDPR Principles

The Co-operative adheres to the six core principles of the UK GDPR. Personal data must be:

1. **Processed lawfully, fairly and transparently**
2. **Collected for specified, explicit and legitimate purposes**
3. **Adequate, relevant and limited to what is necessary**
4. **Accurate and kept up to date**
5. **Retained only for as long as necessary**
6. **Processed securely**, protecting against unauthorised or unlawful processing, loss, destruction or damage

These principles underpin all data-handling activities within the Co-operative.

3. Purpose of This Policy

This policy explains:

- What personal data we collect
- Why we collect it
- How we use, store, share and protect it
- The rights of members and applicants
- Our responsibilities as a Data Controller

It should be read alongside our **Privacy Notice**, which provides detailed information on specific processing activities.

4. Legal Bases for Processing

Under the UK GDPR, we must have a lawful basis for processing personal data. The Co-operative relies on the following:

4.1 Legal Obligation

To comply with housing law, health and safety requirements, regulatory duties, and financial reporting obligations.

4.2 Legitimate Interests

To operate effectively as a housing provider, including tenancy management, maintenance, governance, and communication with members.

4.3 Consent

Used only where necessary and appropriate (e.g., optional communications). Members may withdraw consent at any time.

5. Data We Collect and How We Use It

We collect personal information directly from members and applicants, and occasionally from third parties where necessary (e.g., references, local authorities).

We collect data for purposes including:

- Tenancy applications and allocations
- Tenancy management and rent collection
- Repairs and maintenance
- Governance and membership administration
- Legal compliance and regulatory reporting
- Emergency contact and safeguarding purposes

We only collect information that is necessary for these purposes.

6. Data Storage, Security and Retention

6.1 Storage and Security

We use a combination of technical and organisational measures to protect data, including:

- Password-protected systems
- Secure cloud storage with access controls
- Encrypted devices
- Restricted access based on role
- Staff and committee training on data protection

6.2 Retention

We retain personal data only for as long as necessary. Our **Data Retention Schedule** (maintained separately) sets out specific retention periods for:

- Tenancy files
- Financial records
- Maintenance records
- Complaints
- Governance documents

When data is no longer required, it is securely destroyed.

7. Sharing Data with Third Parties

We work with trusted third-party organisations to deliver services such as:

- Repairs and maintenance contractors
- IT and cloud service providers
- Accountants and auditors
- Legal advisors
- Regulatory bodies (where required)

7.1 Roles

- **Data Controller:** Southward Housing Co-operative
- **Data Processors:** Third parties (managing agents) acting on our instructions

All processors must comply with UK GDPR and sign appropriate data-processing agreements.

8. Data Breaches

A data breach is any incident that results in:

- Loss
- Unauthorised access
- Disclosure
- Alteration
- Destruction of personal data

We will:

- Assess all breaches immediately

- Report notifiable breaches to the ICO within 72 hours
- Inform affected individuals where there is a high risk of harm (e.g., identity theft, fraud, discrimination)

All processors must notify the Co-operative of breaches without delay.

9. Rights of Members and Applicants

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent (where consent is the legal basis)
- Lodge a complaint with the Information Commissioner's Office (ICO)

9.1 Subject Access Requests (SARs)

Requests must be made in writing to:

The Data Controller
Southward Housing Co-operative
3 Lydden Grove Wandsworth London, SW18 4LJ

Email: admin@southwardhousing.co.uk

Telephone: 07907 631 333

We will respond within **one month**. Identity verification may be required.

10. Data Protection Governance

- The Management Committee oversees compliance with this policy.
- A designated **Data Protection Lead** is responsible for day-to-day data protection matters.
- Data protection is reviewed quarterly and reported annually at the AGM.
- Training is provided to all committee members and volunteers who handle personal data.

11. Data Protection Impact Assessments (DPIAs)

The Co-operative will conduct DPIAs for any processing that is likely to result in high risk to individuals, such as:

- New technologies
- Large-scale processing
- Sensitive data handling

12. Policy Review

This policy will be reviewed annually or sooner if:

- Legislation changes
- New processing activities are introduced
- A significant data breach occurs
- The Management Committee determines an earlier review is necessary