

Strong Foundations Sustainable Futures

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Data matters: managing your co-operative's Information

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What is personal data under GDPR?

What information could identify a living person?

Which examples do we hold in our housing co-op?

Which information needs extra protection?

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Who does GDPR apply to?

- Controllers decide why and how personal information is used.
- Processors handle it on a controller's behalf.
- Housing co-ops and landlords usually act as controllers.
- UK GDPR covers UK processing and some overseas organisations.
- EU GDPR may also apply where its territorial conditions are met.



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Key obligations

- Lawful basis and transparency: Landlords must establish a legal ground (like contract or legitimate interests) and supply transparent privacy notices outlining data collection for rent, maintenance and tenancy management.
- Special category data: Handling sensitive details like tenant health, vulnerabilities or ethnicity requires strict explicit consent or specific legal justification.
- Subject access requests (SARs): Tenants have the right to request their personal data, which organisations must fulfil within one calendar month.
- ICO registration (Information Commissioner's Office): Unless exempt under purely personal household use, anyone processing tenant data must register.



Common compliance pitfalls

- Sharing tenant details without a lawful basis or proper authority.
- Using “GDPR” to refuse safe, justified information sharing.
- Keeping inaccurate records or no record of key decisions.
- Giving committee members wider access than their role needs.
- Keeping old data indefinitely or using insecure personal accounts.

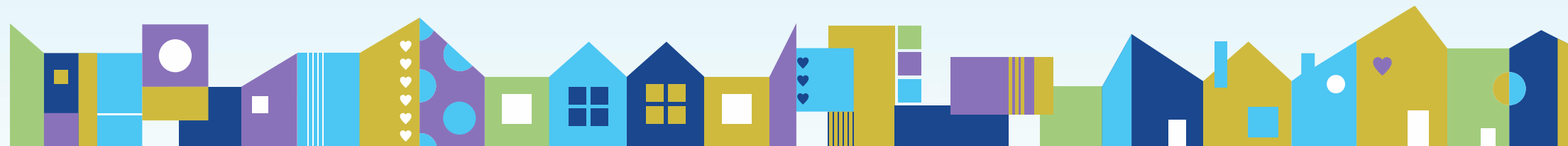


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The seven GDPR principles

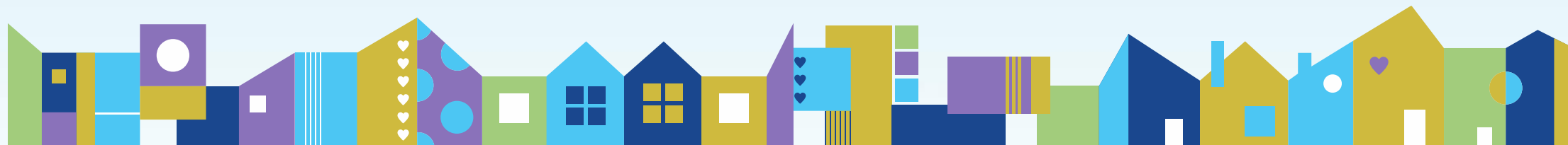
Principle	Co-operative housing example
Lawfulness, fairness and transparency	Explain why tenancy and repair data is used.
Purpose limitation	Use repair contacts only for the repair.
Data minimisation	Give contractors only necessary details.
Accuracy	Correct contact details and rent errors.
Storage limitation	Set retention periods and delete securely.
Integrity and confidentiality	Restrict files; use approved secure systems.
Accountability	Keep decisions, training and review records.



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Landlords need to register

- Electronic processing: If you store tenant personal data (names, phone numbers, bank details) on a computer, tablet or smartphone you have to register.
- Property count: Rule applies whether you own a single rental property or a large portfolio.
- Using an agent: You still need to register if you independently hold or process any tenant info yourselves.
- CCTV: Landlords who use security cameras that monitor common areas or outside spaces must register.



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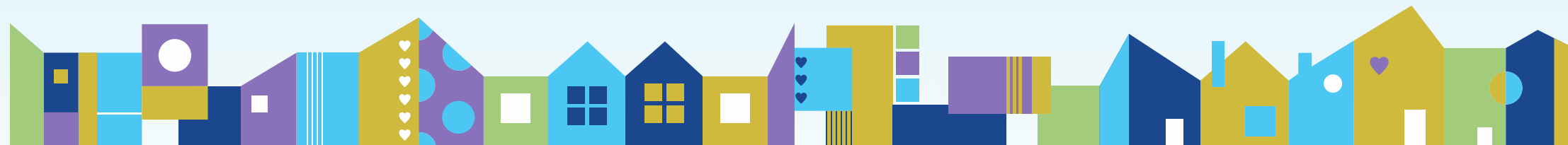
Key UK GDPR changes

So, what has changed?

How should we handle data protection complaints?

What are recognised legitimate interests?

What has changed for automated decisions?

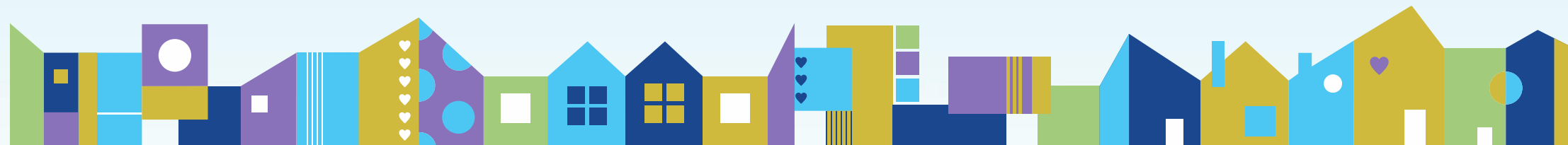


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What does it mean to be GDPR compliant?

What do we need to have?

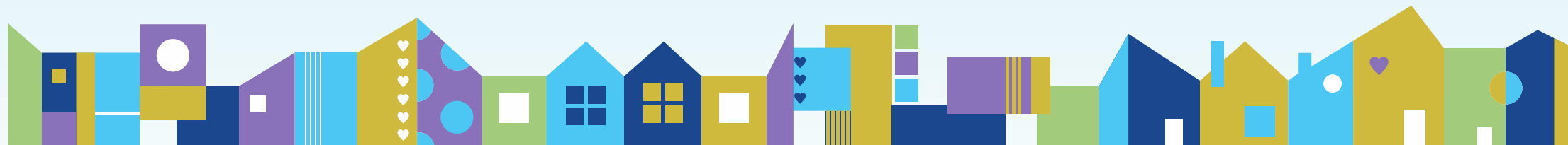
- Secure access controls
- Automated retention policy
- Comprehensive audit trails
- Make sure tenant data is managed responsibly
- Have good policies in place
- Privacy notice
- Reducing risk and maintaining tenant trust



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What does that look like?

- Have a data map: applications, tenancies, repairs and complaints.
- Have clear policies, privacy notices and justified retention rules
- Have role-based access and staff/committee confidentiality training
- Have appropriate contracts with processors and sharing arrangements.
- Have workable SAR, complaint and breach reporting procedures.

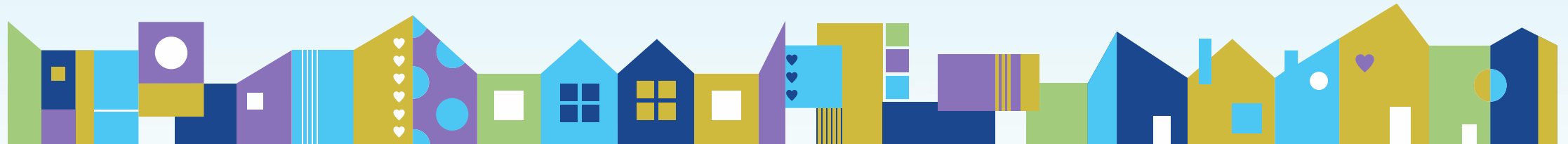


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Benefits of GDPR compliance

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- Legal compliance: Avoid fines and penalties for data breaches or mishandling.
- Tenant trust: Builds confidence by safeguarding personal info.
- Data accuracy: Encourages proper data management and governance practices.



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How do audits link to GDPR

Audit trails track all data interactions for accountability.

1. Information held

2. Lawful bases for processing personal data

3. Consent

4. Consent to process children's personal data for online services

5. Registration

6. Privacy notices

7. Processing children's personal data

8. Right of access

9. Right to rectification and data quality

10. Right to erasure including retention and disposal

11. Right to restrict processing

12. Right of data portability

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How do audits link to GDPR

13. Right to object

14. Rights related to automated decision-making including profiling

15. Accountability

16. Data processor contracts

17. Information risks

18. Data protection by design

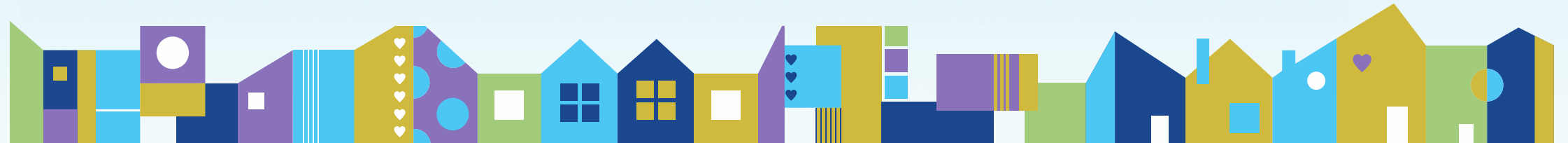
19. Data protection impact assessments (DPIA)

20. Data protection officers (DPO)

21. Management responsibility

22. Security policy

23. International transfers



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Example of a GDPR audit trail

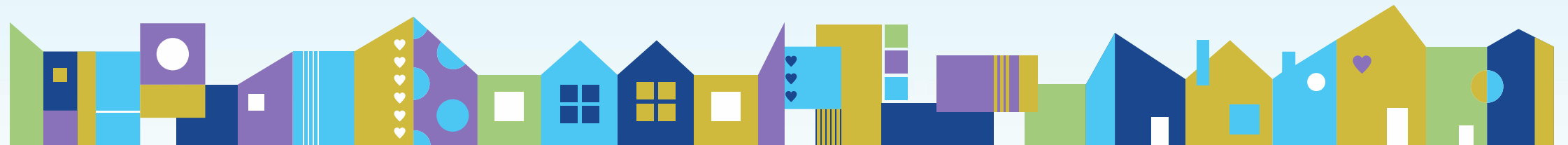
Illustrative repair case R-026: routine plumbing repair

Stage	Evidence kept
1. Receive the request	Date, case reference and necessary contact details.
2. Approve the use	Purpose, lawful basis, approver and recipient checks.
3. Share the minimum	Details sent, recipient, date and secure channel.
4. Record completion	Who updated the repair record and what changed.
5. Review retention	Retention rule, review date and deletion record.

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Draft agreement

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Strong foundations for responsible data use

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Know what you hold and why.

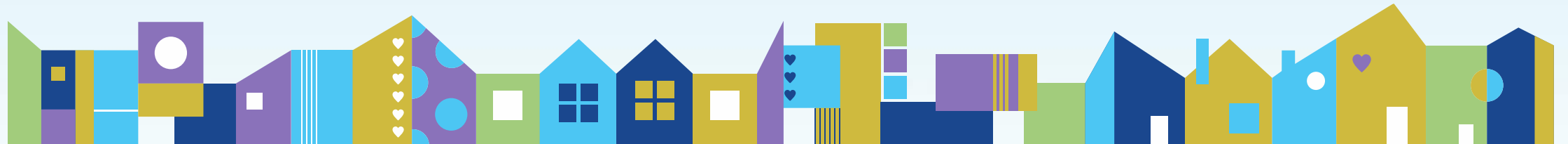
Control access and share lawfully.

Keep evidence and review your practice.

Thank you

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