

BACKGROUND INFORMATION FACTORING OFFICER

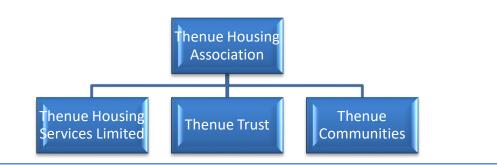
Our Story

Thenue Housing Association Ltd is a Registered Social Landlord (RSL) and was formed in 1979. We have a stock base of 3,000 properties; we own 21 supported housing properties, have around 45 sharing owners and offer a factoring service to over 800 owner occupiers. Our housing stock is a mixture of new build houses and flats built between the late 1970s and the present day, Victorian sandstone tenements including a few listed buildings and 1930s 'interwar' flats. They are spread across several locations in Glasgow including Bridgeton, Calton, Cranhill, Castlemilk, Dalmarnock, Scotstoun, Baillieston and Blackhill.

All our staff are based in the registered office at 423 London Road. We have two Community Centres (Calton Heritage & Learning Centre and Netherholm Community Hall), which are managed through our subsidiary Thenue Communities. We employ over 75 members of staff and have Group turnover of over £20.3 million.

Thenue Housing operates a group structure:

- **Thenue Housing Association Limited**: owns the housing, is the parent body with charitable status. Regulated by the Scottish Housing Regulator.
- Thenue Housing Services Limited: a wholly owned subsidiary company through which non-charitable consultancy work other housing related activities are channelled.
- **Thenue Trust:** aims to attract charitable resources for the communities where we work.
- Thenue Communities: a charitable subsidiary company that manages our local community centres providing facilities for learning, training, play or social events.



BACKGROUND TO FACTORING OFFICER POST

FACTORING TEAM, FINANCE DEPARTMENT

We are seeking a highly skilled, enthusiastic and motivated individual who will be a key part of our Factoring Team.

The Factoring Officer role is a permanent, full-time post. The post is based within the Factoring Team currently consisting of 2 Factoring Officers. The Factoring team is part of the Finance Department and you will report to the Finance Manager.

The Factoring Officer will play a key role in the delivery of Thenue's Factoring service.

The post is 35 hours per week Monday to Friday. We currently operate a Hybrid and Flexible First Working Policy, working in our office in London Road and working from home each Friday. The opportunity to work more from home each week is available, in line with service delivery requirements and our Finance Team Charter.

You will be responsible for delivering an effective factoring service function which is responsive to the needs of the Association's staff, Board and customers . You will be responsible for providing excellent customer service to owner occupiers, sharing owners and commercial owners as well as ensuring that the factoring service maximises its income.

You will have significant experience of factoring coupled with experience of legislative and compliance requirements and be prepared to go the extra mile for our customers.

Educated to a higher standard is required and a relevant professional qualification is desirable.

As a member of our team, you will embrace our organisation's culture and values, ensuring they are visible, embedded, and upheld. We aim to be the best we can be.

SALARY AND CONDITIONS

Thenue Housing Association Ltd offers an attractive employee benefits package in accordance with EVH terms and conditions including:

Salary

The pay band range for the Factoring Officer is EVH Grade 7, PA22 - PA25 (£39,072- £42,903) per annum

Duration

The Factoring Officer post is a permanent post, subject to satisfactory completion of a 6 months' probationary period.

Checks

A Basic Disclosure Scotland check will be required for this post.

Holidays

Annual leave entitlement is 25 days plus 15 public holidays per annum, in line with our EVH Statement of Terms and Conditions of Employment. There are an additional 4 days leave through our Hybrid and Flexible First Policy.

Work/Life Balance

Thenue promotes a work/life balance in relation to working hours. Our standard working week is 35 hours Monday to Friday. We operate a hybrid model of working where some days can be worked from home, others in the office, dependent on the needs of our business and in accordance with our Team Charters. We also operate a Flexible First approach which allows some degree of flexibility in terms of working hours.

Pensions Scheme

Thenue provides a Defined Contribution Pension Scheme through the Scottish Housing Association Pension Scheme (SHAPS). Life cover is paid by the association in addition to the main pension contribution. Automatic enrolment into the pension scheme we provide is necessary, however, you may opt out if you wish. If you do, we are required to enrol you again every three years. Additional voluntary contributions can be made and a salary sacrifice/exchange scheme operates.

Westfield Healthcare

Thenue has recently introduced provision of healthcare, however you may opt out if you wish.

Payment of Professional Fees

The Association will re-imburse one set of annual fees paid by employees for membership of professional institutions when such membership is directly relevant to the work of Thenue.

Prescribed Spectacles

Thenue will contribute £110.59 as of 1 April 2025 towards the cost of prescribed spectacles.

Cycle to Work

Thenue participates in the Government's 'cycle to work' scheme to promote healthier journeys and to reduce environmental pollution.

THE RECRUITMENT PROCESS

Thank you for taking an interest in Thenue Housing. We hope that a combination of this introduction and the various attachments should help you to learn more about us, the post open for recruitment and encourage you to take the next step!

When submitting your completed application form, please email to recruitment@thenuehousing.co.uk. Please include the job title in the email subject line.

Complete your Equalities Data Collection Form – click to view

Identification, work eligibility, proof of qualifications, Disclosure Scotland and references will be requested only if you are offered the position. The offer will be subject to satisfactory checks. **Please do not include copies of your qualifications or references with your initial application.**

An application made by a relative of either a current Board member or anyone who has been a Board member within the last twelve months, cannot be considered and no offer of employment can be made. The enclosed person specification lists the minimum essential and desirable requirements for the post. When shortlisting for interview, the interview panel will not make any assumptions about the nature of your experience, skills and knowledge. It is therefore important that you provide detail of your skills and abilities within the application form.

You should consider the relevance of the information supplied in your application form, with that contained in the person specification and job description. Stating that you meet the criteria in the person specification alone does not demonstrate this to the interview panel. You should provide examples and evidence demonstrating your skills and experience.

If you are shortlisted for interview, the interview panel will wish to discuss the areas covered in the Person Specification in more detail. The questioning at interview will be designed to assess further how you meet the criteria in the person specification as well as your commitment to the values of Thenue.

Please note if you are not asked to interview we are unable to provide feedback to those candidates that have not been invited to interview.

Thenue Housing Association is an equal opportunities employer and is committed to diversity in employment. If you are interested in the post and wish an informal discussion with us then you may contact Tracy Thomson, Finance Manager on tracy.thomson@thenuehousing.co.uk

Please note that the closing date for receipt of your application is at 12:00pm on Monday 27th of January 2025. Interviews will be held on 4th & 6th February 2025, in Thenue's office at 423 London Road.

Communication from Thenue will be via email, please ensure the email address given is operational and check your Spam or Trash boxes for responses.

THENUE HOUSING ASSOCIATION LTD

JOB DESCRIPTION

JOB TITLE: DEPARTMENT: GRADE: RESPONSIBLE TO: Factoring Officer Finance EVH Grade 7 (PA22 – PA25) Finance Manager

JOB OUTLINE

- To assist the Finance Manager in maintaining and developing a comprehensive factoring service to owner occupiers, sharing owners, and commercial owners.
- To assist the Finance Manager in ensuring that the Association meets its obligations under the Factoring Code of Conduct as outlined in the Property Factors (Scotland) Act 2011 and the revised code of Conduct for Property Factors 2021.
- To deliver excellent customer services and to act as the initial point of contact for owners.
- To liaise with the Association's Property Services and Community Housing Services Departments and individual owner occupiers on all matters relating to non-routine services including major repairs.
- To ensure that the factoring service seeks to maximise its income.
- To assist in achieving Thenue's organisational objectives.

RESPONSIBILITIES AND TASKS

1. Customer Service

- To provide a customer friendly service in line with Thenue's Service Standards.
- To take a positive and helpful approach to customer complaints and enquiries.
- To suggest improvements in customer services.
- To be the day-to-day contact in respect of customer enquiries/complaints with regard to the factoring service.
- To report to the Finance Manager on customer complaints with the factoring service.

2. Customer Invoicing & Payments

- To produce and issue invoices to agreed timetables in accordance with the Written Statement of Services.
- To issue final accounts to former owners including liaising with solicitors regarding retentions of monies from sale proceeds pending finalisation of charges.
- To co-ordinate and manage the regular payment scheme for owner occupiers including the regular review of direct debit amounts.
- To adopt a proactive approach to the taking of immediate payment over the phone where appropriate.
- To respond to queries from owners about their invoices and seek to resolve disputes as quickly as possible.

3. Income Maximisation

- To ensure that the Association's policies and procedures pertaining to income maximisation are carried out on a proactive and consistent basis.
- To liaise with the Association's approved debt recovery agents as appropriate.
- To apply Notices of Potential Liability for Costs to properties as appropriate.
- To liaise with the Association's legal representatives in relation to court action as appropriate.
- To assist the Finance Manager in the production of regular performance reports on income maximisation, including regular arrears reports.

4. Liaising with Owner Occupiers

- To communicate effectively with owner occupiers regarding the maintenance of their common property.
- Issue the Association's Factoring Written Statement of Services to all owner occupiers.
- To assist in the preparation of periodic articles for the Association's newsletter on factoring and our factoring service and for any Owners Newsletters.
- To attend meetings with owners including close meetings to discuss proposals for forthcoming major works or other non-routine works.
- To arrange and manage regular owner forum meetings.
- To conduct interviews with owners and/or carry out home visits as appropriate.
- To provide details to owner occupiers of the Association's block insurance policy.
- To provide prospective owners with information on the Association's factoring service.

5. Internal Communication/Team Working

- To work with the Repairs, Property Services and Area Services teams to ensure that the factoring service is effectively co-ordinated.
- To liaise with the Property Services team in the delivery of the Association's cyclical and major repairs programme relating to factored properties.

6. System Management

- To ensure that the Association's factored property and tenancy management records are properly maintained on the Association's computer systems. This will include liaising with the Finance team to ensure that the correct property charges are applied.
- To ensure that change of ownership details are properly recorded on the Association's computer systems.
- To ensure that tenure types relating to factored properties are properly recorded on the Association's computer systems.
- To review and recommend improvements in efficiencies, processes and procedures.

7. Policy and Service Review

- To assist the Finance Manager in the development, review and implementation of policy and procedures.
- To assist the Finance Manager to ensure continuous improvement in the delivery of the factoring service.
- To be fully aware of Thenue's policies and procedures in respect of factoring.

8. Other Aspects of Factoring

- To request information from Land Registry as and when appropriate.
- To maintain all records and legal documents on ownership.

9. Approach to Tasks & Activities

- Put the customer first and aim to "go the extra mile".
- Prioritise your own workloads, time, and resources to agreed deadlines and budgets.
- Be flexible and adaptable and be able to work under pressure.
- Demonstrate energy and commitment.
- Display excellent communication skills.
- Effectively use relevant software for tasks.
- Look for solutions, not just problems.
- Be flexible in approach to working hours.
- Be able to cope effectively with competing demands.
- Constructively liaise with other sections and departments.
- Embrace change.

10. General

- To undertake training or attend training events and conferences as required.
- To undertake any other tasks which may from time to time be required in line with the needs and objectives of the Association's business.

Barry Allan Director of Finance (IT and Resources) 6 January 2025



PERSON SPECIFICATION

	ESSENTIAL	DESIRABLE
EDUCATION AND QUALIFICATIONS SKILLS AND KNOWLEDGE	 Educated to higher standard or equivalent. Excellent knowledge of factoring and a track record of dealing and negotiating with a cross-section of colleagues and customers. Awareness of, and compliance with all relevant best practice and legislative frameworks. Provision of technical advice to colleagues, seniors and others. Good working knowledge of Microsoft Word and Excel. Awareness of the Property Factors (Scotland) Act 2011 and the Revised Code of Conduct for Property Factors 	 Housing qualification, degree. Experience of using HomeMaster Basic technical knowledge of building components
EXPERIENCE	 Excellent communication and customer service skills as well as the ability to manage your own workload whilst coping with changing circumstances and demands. Solid work history which indicates a track record of appropriate responsibilities having been successfully covered in previous posts. Significant experience of negotiation skills in setting up realistic and affordable payment plans with individuals in arrears. Experience of routinely applying judgement and concluding all pieces of work within policy guidelines. Experience of suggesting and applying solutions to work problems encountered within the role and contributing to procedural improvement and policy development. 	 Experience of working in a housing association. Group meetings with owners either at a forum level or close level Experience of data gathering, analysing customer and providing solutions.
PERSONAL ATTRIBUTES	 Excellent customer service skills. Pleasant, positive, assertive and helpful manner. Enthusiasm towards all aspects of the role. Ability to be supportive but also firm as necessary with customers in arrears. 	Full Driving Licence.

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THENUE HOUSING ASSOCIATION LTD

CUSTOMER PRIVACY NOTICE

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will process your information.

Who are we?

Thenue Housing Association is:

A Scottish Charity (Scottish Charity Number SC032782); A registered society under the Co-operative and Community Benefit Societies Act 2014 (No 1933R(S));

and having our Registered Office at:

423 London Road, Glasgow, G40 1AG

We take the issue of security and data protection very seriously including compliance with the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018, and the Privacy and Electronic Communications Regulations, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z5976217 and we are the data controller of any personal data that you provide to us.

Our Data Protection Co-ordinator is the People and Culture Manager, DPO@thenuehousing.co.uk, 0141 550 3581. Any questions relating to this notice and our privacy practices should be sent to the People and Culture Managerat the details above.

Our Data Protection Officer is provided by RGDP LLP and can be contacted either via 0131 222 3239 or info@rgdp.co.uk

How do we collect information from you?

We collect information about you:

- when you apply for housing with us, become a tenant, request services / repairs, enter into a factoring agreement with ourselves, or otherwise provide us with your personal details
- when you apply to become a member;
- when you contact us, by whatever means, whether to report any tenancy / factor related issues, make a complaint or otherwise;
- when we contact you, by whatever means, whether to investigate any tenancy / factor related issues, make a complaint or otherwise; from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information);
- from your responses to satisfaction surveys; and
- From your use of our online services, including social media

What information do we collect?

We may collect the following information from you:

- Name;
- Address;
- Telephone number;
- E-mail address;
- Date of Birth;
- Gender;
- Signature;
- Ethnicity;
- Disability information;
- Religion
- National Insurance Number;
- Housing Benefit or Universal Credit registration No
- Next of Kin;
- Bank details;
- Employment details;
- Dependents details, including name, address, date of birth, National Insurance number, gender, disabilities, economic status, relationship to tenant, telephone number, e-mail address;
- Photographs and associated Permission forms;
- CCTV images;
- Sound recording data;
- Account information;
- Information provided or collected in investigating a complaint;
- Information provided or collected in investigating an anti social behaviour issue;
- Information provided or collected to assist with tenancy sustainment; and
- Information provided or collected to inform our decision as to whether a two person visit is required.

We may also record factual information whenever you contact us or use our services, as well as information about other actions we take, so that we have an accurate record of what happened.

We may receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit
- Payments made by you via bank transfer, Allpay or any other method
- Complaints or other communications, regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland & Community Safety Glasgow
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour
- Information relating to any homeless application you may have submitted, supplied by the relevant local council
- Information from health or social work services in relation to your tenancy or housing application
- Updated information received by our contractors and suppliers who have undertaken works on our behalf
- Information in relation to health and wellbeing following responses to alarm call outs from our alarm contractors, Scottish Fire and Rescue Service and the relevant Local Authority
- Legal advisors
- Health professionals

- Local authorities
- Charities
- MPs, MSPs and Councillors
- Other registered social landlords
- Utility companies
- Household members

How will we use your information?

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to contact you for your views on our products and services.
- to contact you in order to send you details of any changes to our services or supplies which may affect you;
- to perform our public task in relation to provision of secure tenancies and for the alleviation of homelessness
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer; and
- for all other purposes consistent with the proper performance of our operations and business.

When you visit our website

We may collect personal information about you, if you:

- pay your rent;
- pay your factoring bill;
- report a repair to us;
- make a complaint to us;
- complete and submit a "contact us" form;

We may use this personal information to:

- provide you with the services that you have requested from us;
- communicate with you, including in response to any of your enquiries;
- improve our services and respond to changing needs;
- process your rent payments;
- carry out repairs to your property;
- handle and resolve complaints made by, or, against you;
- keep the personal information that we hold about you accurate and up-to-date (if you provide any new personal information to us via the website); and
- signpost you to organisations that can offer benefits and debt advice and support
- To provide you with translation services where you require it
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Visiting our premises

When you visit one of our premises, we may record your name in our signing-in register. Your image may be captured by our CCTV cameras. Notices are available where the cameras are in operation.

If you are a business contact

We may collect your business contact details such as your name, business address and business e-mail and your company's bank account details. If you are a sole trader this may be your personal details which will be treated in accordance with this notice.

If you apply for a job with us

We will ask for your contact details, previous employment history and qualifications. We may collect details of ethnicity and disability – for equalities monitoring and so that we can make any appropriate adjustments to accommodate you through the recruitment process.

What are the legal bases for us processing your personal data?

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

Performance of a contract

Where we are entering into a contract with you or performing our obligations under it, such as when you have a Tenancy or Factoring Agreement with us.

Performance of a task in the public interest

Where we provide housing services in relation to:(a) the prevention and alleviation of homelessness,(b) the management of housing accommodation where we have granted a Scottish secure tenancy

Legal obligation

Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court or regulatory authority like HMRC.

Vital interests

Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual on our premises) or a safeguarding issue which requires us to share your information with the emergency services.

Consent

Where you have provided specific consent to us using your personal information in a certain way, such as to send you email, text and/or telephone marketing. This is also the basis for you giving permission for photography at our events.

Legitimate interests

Where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights).

We consider our legitimate interests to be for running Thenue Housing Association. For example to:

- provide our services;
- run our business, for example, processing financial transactions for payment of our suppliers and to invoice our contractors
- recruit staff
- protect our staff and customers and assist with the prevention and detection of crime
- monitor who we deal with to protect our Association against fraud, money laundering and other risks;
- enhance, modify, personalise or otherwise improve our services /communications for the benefit of our customers; and
- better understand how people interact with our website.
- use CCTV for the prevention and detection of crime, and for the safety and security of staff, tenants, and other persons, including visitors to Thenue HA premises

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you, for example, where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

Processing special category personal data

Special categories of personal data means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

When we process sensitive personal information, such as health information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law (for example, if we need to process it for employment, social security or social protection purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

Who might my data be shared with, or seen by?

The information provided to us will be treated as confidential and will be processed only by our employees within the UK. We may disclose your personal data to any of our employees, officers, contractors, insurers, professional advisors, agents, debt collection agencies, suppliers or subcontractors, government agencies and regulators and healthcare providers insofar as reasonably necessary, and in accordance with data protection legislation.

We also disclose your personal data:

- With your consent;
- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners
- If we instruct repair or maintenance works, we may disclose any relevant information required for the contractor to carry out the work
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise
- If we are updating tenancy details, we may disclose any relevant information to third parties (such as utility companies and Local Authority)
- Your information may be shared with our solicitors and auditors and Data Protection advisers
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, solicitors, debt recovery agents, Local Authority and the Department of Work & Pensions
- If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results
- Your data (name and address) may be shared with organisations who deliver mail on our behalf
- Your data may be shared with the Department of Work and Pensions, Local Authorities or any other relevant department to facilitate the payment of any benefits or if required to assess your housing needs
- As requested by the local authority with regards to the processing of council tax or electoral registrar
- If requested by an emergency service
- If you are using an advice or advocacy service (such as a solicitor, advice agency or welfare benefits advisor) we will share relevant information with them where it is necessary to progress your case.
- When required to do so for legal or regulatory reasons, for example to the Health and Safety Executive or Scottish Public Services Ombudsman. Where we share your information with our photographer to allow photos to be taken for our newsletter and website

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information provided to us without consent.

Transfers outside the UK and Europe

Customer information will only be stored within the UK and EEA (European Economic Area) except where international transfers are authorised by law.

Security

When you give us information, we take steps to make sure that personal information is kept secure and safe. All data is held in accordance with Thenue's Data Protection Policy, a copy of this is available on our website and from our office.

How long will we keep your information?

We review our data retention periods regularly and will only hold personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

Data retention guidelines on the information we hold are available. We will generally keep your information for the minimum periods set out in the guidelines after which this will be destroyed if it is no longer required for the reasons it was obtained.

What are your rights?

You have the right at any time to request to exercise your data subjects' rights in relation to the following:

- The right to be informed covered by this privacy notice
- The right of access to request a copy of your personal information and to check that we are holding and using it in accordance with legal requirements.
- The right to rectification correction of any incomplete or inaccurate personal information that we hold and use about you, there may be instances where it is not appropriate to rectify information, for example, if something was done incorrectly but identified and the correct cause of action taken, the record would show the full picture so would be accurate
- The right to be forgotten to request deletion of your personal information where there is no good reason for us continuing to hold and use it, if there is a legal obligation to keep the information then this does not apply, for example, where there is a contractual obligation to keep the information
- You also have the right to ask us to do this where you object to us holding and using your personal information (details below).
- The right to restrict processing to temporarily suspend the use of your personal information, for example, if you want us to check that it is correct or the reason for processing it, this is not an absolute right and only applies in certain circumstances, for example, where the processing is unlawful or we no longer need the data for the purpose of the processing.
- The right to data portability to request the transfer of your personal information to another organisation, where you have provided the information to us electronically.
- The right to object to processing You can also object to us holding and using your personal information where our legal basis is a legitimate interest (either our legitimate interests or those of a third party), including the right to object to direct marketing.
- Rights in relation to automated decision making and profiling

If you would like to exercise any of your rights above please contact us at DPO@thenuehousing.co.uk .

We will respond without delay and within one month of your request in writing.

You will not have to pay a fee to access your information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for information is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below: The Information

Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 Website: <u>https://ico.org.uk/make-a-complaint/</u>

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

Changes to this Privacy Notice

Thenue Housing Association reserves the right to update this privacy notice at any time and will provide you with a new notice when making any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.