

Client Privacy Notice

1. Introduction

- 1.1 In order for us to carry out our duties in providing effective housing, support and training services, we have to obtain, record, process and store personal information about our applicants, clients and suppliers.
- 1.2 For the purposes of the Data Protection Act 2018, Horton Housing is a Data Controller. Horton Housing includes all organisations within the Horton Group: Horton Housing Association, Chartford Housing Limited, Bradford BASE and Horton Housing Support Limited. This Policy applies to all organisations within the Horton Group ('Horton Housing').
- 1.3 In order to comply with the Data Protection Act 2018, this Notice details how we treat your personal data, so please read it carefully. We are committed to ensuring that your personal data is processed fairly and lawfully.
- 1.4 For the purposes of this Client Privacy Notice, "client" refers to any person using our accommodation, support or training services. These are sometimes referred to as 'tenants', 'service users', 'residents', 'applicants' or 'clients'.

2. What is personal data?

- 2.1 Personal data is information that relates to a living person, and which allows that person to be identified e.g. name, date of birth, address, telephone number etc.
- 2.2 Certain types of personal data are classed as being 'special category data'¹. For example, information which relates to a person's:
 - race;
 - ethnic origin;
 - politics;
 - religion;
 - trade union membership;
 - genetics;
 - biometrics (where used for ID purposes);
 - health;
 - sex life; or
 - sexual orientation.
- 2.3 Personal data relating to criminal allegations, proceedings and convictions is classed as 'criminal offence data'.

¹ Information Commissioners Office (ICO) Special Category Data [Online] <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/> [Accessed 29.06.18]

3. What is our lawful basis for processing your personal data?

- 3.1 We process your data for our legitimate interest and/or for contractual obligation. This means that we ask for and use your personal information so that we can provide you with a service e.g. accommodation, support or training, and so that we can carry out our duties to you.

4. How and why do we collect personal data?

- 4.1 We ask you for your personal data so that we can provide you with a service, tailor it to your particular needs, and carry out the duties expected of us. We collect special category data primarily for monitoring purposes. You may be asked to provide personal data to us when you get in touch or communicate with us.
- 4.2 This may include, when you make or respond to housing or other service applications, as part of receiving a service from Horton Housing, or when a member of our staff gets in contact with you in relation to personal matters, your accommodation or support, or for any other reason.
- 4.3 Whenever you communicate with us, we may need to get personal details about you so that we can carry out any actions that may be needed.
- 4.4 We collect information including needs, risks and your personal history, so that we can provide you with support and accommodation services that are tailored to your individual needs.
- 4.5 We may also get your personal details from organisations you have dealt with, such as referral agencies, support providers, social landlords, past landlords, the police, and other services you have had contact with.
- 4.6 At some accommodation schemes we have a secure CCTV-based access control entry system to ensure the safety and security of our clients. This will be used to verify your identity and control who is accessing the building.
- 4.7 If you are a client at any of our accommodation schemes, then you need to agree to be photographed so that we can confirm your identity. This is to ensure, for your safety and others, that we only let people into the building who should be there.
- 4.8 At our accommodation schemes, we may also use your photo if we need to make a missing person's report to the Police. The Police may then decide to use this photo in the media (including social media) if they feel that it is necessary.
- 4.9 If it is unclear to you why we are asking for any piece of information, you can ask staff to explain further. They will be able to give you an example of how we may use the information to support or house you.

5. How do we use your personal information?

- 5.1 The ways in which we process your personal details are:
- to allow us to assess applications;
 - to provide you with support and/or accommodation;

- to manage your accommodation;
- to assist you with accessing accommodation or other support services from external providers.
- to support you in training or work placements;
- to conduct surveys and produce statistics in order to improve services;
- to conduct surveys and produce statistics when requested by the local authority, the Regulator of Social Housing or other relevant agencies;
- to provide you with information about Horton Housing's services that may be of interest to you;
- to enable us to comply with our legal, regulatory and contractual obligations;
- to enable us to carry out our audit, quality assurance and continuous improvement functions;
- to allow us to produce case studies for monitoring or promotional purposes;
- to provide CCTV based identity confirmation and access control at some of our accommodation services.

6. Who may we share your personal details with?

6.1 We may need to contact other people and organisations, and share or receive information about you with them. These may include:

- Utility companies
- Housing providers/landlords/supported lodging hosts
- Benefit offices (Job Centre/DWP)
- Social Services
- Medical professionals e.g. Doctor, Nurse, Health Visitor
- Drug and alcohol services or treatment agencies
- Police – including for the purposes of obtaining risk information
- Probation/Youth Offending Team
- Other professionals e.g. your Support Worker, CPN
- Training, education or employment organisations
- Family
- Friends
- Funders
- Charitable organisations e.g. if applying for grants
- CCTV access control monitoring staff
- Other Horton Housing colleagues

6.2 We may be required by law to disclose your personal details in order to comply with relevant laws, and lawful Government requests; this could include disclosing personal details as part of a criminal investigation or for safeguarding purposes.

6.3 We may share your assessment details with another provider, if we think that their service is better suited to your needs, e.g. when we have a lengthy waiting list or when there is a more appropriate service available elsewhere.

- 6.4 We may transfer your details internally to another Horton service if we think that it is more suited to your needs.
- 6.5 If you live in our accommodation, then on occasion we may need to share limited information about you with our Approved Contractors, in order to progress repairs or other work orders. This will be done through an automated mechanism in our electronic data management system.
- 6.6 If you live in our accommodation we are required by the Ministry of Housing, Communities and Local Government to complete a CORE log, which will contain your personal data. The Ministry will use your information for research and statistical purposes. We will make a CORE Privacy Notice available to you which explains this.

7. Storing your personal information

- 7.1 We will not keep your personal data for any longer than is necessary to fulfil the purposes for which it was collected and processed. Each scheme has a different retention period e.g. some may need to keep information for 2 years, 5 years, 10 years etc. If you would like further information about how long we will need to keep your personal data, then please speak to the Manager of your service.
- 7.2 When no longer needed, we will review and delete your personal data, unless there is some special reason for keeping it, e.g. when we are required for contractual reasons by the organisation who funds your service.
- 7.3 We are committed to protecting your personal details, and have measures in place to ensure restricted staff access. We use both electronic and paper systems for recording, processing and storing your data.
- Electronic format – email, computer systems, CCTV, digital cameras, mobile phones;
 - Paper format – an organised paper filing system containing a variety of documents e.g. applications, tenancy agreements, support plans, case notes, letters, minutes of meetings e.g. Client Forums.
- 7.4 The record of your housing, support or care will be stored on our electronic data management systems, accessed by staff employed by Horton Housing. Our Information Communication & Technology Department make sure that access to this is restricted, and that appropriate security measures are in place.
- 7.5 Paper records or copies of your data may also be kept, and will be stored securely by the service working with you. Records will be kept safe in transit, such as when staff are out of the office working with you, or on your behalf.
- 7.6 We sometimes use CCTV for the purposes of crime prevention and detection, and where we do, signage will be clearly displayed. At some accommodation schemes we also use CCTV so that we can control access to the building. We will not use CCTV to record audio information, nor will it be used in any area where you would normally expect privacy, such as changing rooms or bathrooms.

8. Your Rights ²

8.1 ***Your right to be informed:*** we will always tell you how we will collect and use your personal data, and will check that you understand what this means. We will use this Client Privacy Notice to let you know how we do this. We will also explain it to you when we request your personal data e.g. when you are referred to the service, come for an assessment, and when you start receiving support. We will also provide you with information about this in our Client Handbook.

8.2 ***Your right to access your information:*** you have the right to know what information is held about you, and can request access to your personal information.

We will provide the information as quickly as we can, and within one month from your request. This period may be extended by a further 2 months where requests are complex or numerous. If this is the case, we will notify you within 1 month of your request.

We will usually provide the requested information free of charge, although we have the right to charge a 'reasonable fee' where a request is excessive, particularly if it is repetitive.

We have the right to withhold information under the following circumstances:

- where it also includes information that relates to another person;
- where disclosure may affect the health, safety or welfare of you or another person;
- where disclosure may affect crime prevention or investigation.

We will always let you know in writing, if there is a reason to withhold information.

If you want to request information about a child under 13, we can only provide this if you have parental responsibility. Children aged over 13 have rights over their own personal data, and parents/guardians cannot be given access to it, unless we have permission from the child to allow this to happen.

8.3 ***Your right to update your information:*** we are committed to keeping your personal details accurate and complete. You can inform your worker or the Manager of the service if there are any personal details that need updating. We may require the amendment to be notified to us in writing, and for documentation to be provided depending on the nature of the request.

We will respond to any requests to update your personal information as soon as possible, normally within 1 month. Where a request is complicated, this may be extended to within 2 months.

8.4 ***Your right to erasure:*** you have the right to request the removal or deletion of your personal data, where there is no justification for Horton Housing to continue to process it.

8.5 ***Your right to restrict processing:*** you have the right to request the restriction of your personal data. This right is only available in certain circumstances e.g. when you have queried the accuracy of your data. Where you have the right it means we are able to store your personal data, but not process it.

² Information Commissioner's Office (ICO) Individual Rights [online] <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights> [Accessed 21.06.18]

- 8.6 ***Your right to data portability:*** you have the right to obtain and reuse any personal data we hold electronically, for your own purposes across different services. This allows you to move, copy or transfer data from one IT system to another.
- 8.7 ***You have the right to object:*** in certain circumstances you have the right to object to how we process your personal data e.g. using your personal data for statistical, marketing or profiling purposes.
- 8.8 ***You have rights in relation to automated decision making and profiling:*** this is when an electronic system uses your personal data to make decisions without any human intervention. We have no plans to make any decisions about you using automated decision making, including profiling. However, if this changes we will ensure that we let you know.

9. If you want further information or are unhappy with how we handle your data

- 9.1 If you want more information on any of the above rights, please contact your worker or the Manager of your service. If you want to let us know that you want to exercise any of these rights, contact our Data Compliance Manager at datacompliance@hortonhousing.co.uk or telephone Head Office on 01274 370 689.
- 9.2 If you think there is a problem with the way we have handled your personal information, then you have the right to complain. You can follow our Complaints Policy and Procedure. Full details are available on the Horton Website www.hortonhousing.co.uk or you can speak to your worker or the Manager.
- 9.3 You can also complain to the Information Commissioners Office (ICO) or seek recourse through the courts. The ICO can be contacted on 0303 123 1113, online at www.ico.org.uk or by post at ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

EASY READ CLIENT PRIVACY NOTICE

When you get support, accommodation or training services from Horton Housing, we need to collect and keep personal information about you. This information is kept secure either on our secure computer systems or in locked filing cabinets.

What information do we have?	<ul style="list-style-type: none"> ▪ Personal details about you and sometimes your family e.g. name, address, telephone number, D.O.B, NINO ▪ Financial information e.g. about any benefits or wages you receive, bank details ▪ Sensitive information such as any health problems, details of religion, ethnicity, sexuality, and any information about criminal offences or risks. ▪ Details about what you need help with and why we are helping you ▪ Your photograph if you live in one of our accommodation services
Why do we need your information?	<ul style="list-style-type: none"> ▪ We need your personal information so that we can support you, give you a home or help you with training. For example, we use the information you have given us to plan your support, manage your tenancy or provide you with training ▪ We would be unable to our job and deliver you a service without having and using your personal information (this is called “legitimate interest”)
How do we use your information?	<ul style="list-style-type: none"> ▪ To provide you with support, accommodation or training ▪ To assist you with accessing accommodation, support or other services from other organisations ▪ To support you in training or work placements ▪ For monitoring and statistical reports ▪ To carry out quality audits and comply with our legal or contractual obligations ▪ We use CCTV and your photo in our accommodation services so we can know who you are when we need to let you into the building. ▪ If we have your photo and you go missing we may use it to make a missing person’s Report to the Police.
Who do we share your information with?	<ul style="list-style-type: none"> ▪ Other people or agencies that we are working with on your behalf. Examples include: utility companies, housing providers, benefit agencies, health services, Police, Probation, training or employment organisations, social services, your family/friends, and other Horton colleagues. ▪ People who fund our services sometimes ask to see information about you.
How long will we keep your information?	<ul style="list-style-type: none"> ▪ This will depend which of our services you are using. Each service has an agreed amount of time that they must keep your personal information for. This is often because the people who fund our services tell us how long we must keep it. Ask your worker if you need more information and they will find this out for you.
What are your rights?	<ul style="list-style-type: none"> ▪ You have a lot of rights when it comes to your information and privacy, including: <ul style="list-style-type: none"> ○ The right to see what information we have about you; ○ The right to tell us if some of the information is wrong and ask us to make it right; ○ The right to object to any information you think is inaccurate.
Where can you get more information?	<ul style="list-style-type: none"> ▪ You should read our full Client Privacy Notice. Ask any member of staff for a copy, or you can download it from our website www.hortonhousing.co.uk ▪ Contact our Data Compliance Manager: datacompliance@hortonhousing.co.uk
What if you have any concerns?	<ul style="list-style-type: none"> ▪ Speak to any member of staff if you are worried or unhappy with how we are managing your personal information/data. ▪ Contact the Information Commissioners Office on 0303 123 1113 or www.ico.org.uk