

The BCHA Group

Supported Housing Customers PRIVACY NOTICE

SUBJECT: Privacy Notice SECTIONS: General Needs REVIEWED BY: Head of Strategy & Governance	Policy No: Privacy notices	Regulatory Std: Gov & FV
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Bournemouth Churches Housing Association: Customers of Supported Housing and Community-based Support PRIVACY NOTICE

WHO WE ARE

Bournemouth Churches Housing Association (BCHA) gathers and processes your personal information in accordance with this Privacy Notice and in compliance with the relevant data protection laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

About BCHA:

- **Registered office address:**
The Factory, 14 Alder Hills, Poole, BH12 4AS
- **Company status:**
BCHA (Bournemouth Churches Housing Association Ltd) is a charitable registered society registered under the Co-operative and Community Benefit Societies Act 2014 with the Financial Conduct Authority, number 18497R.
- **ICO registration:**
BCHA is registered on the Information Commissioner's Office Register, under registration number Z5985815. BCHA act as the controller and processor when processing your data.
- **Data Protection Officer:**
BCHA's designated Data Protection Officer is Philip Baker, who can be contacted by email at companysecretary@bcha.org.uk, or telephone on 01202 410500.

Please read this privacy notice carefully to understand our views and practices regarding your personal data and how we will treat it.

WHAT INFORMATION WE COLLECT

BCHA process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and will only process your information in ways specified in this notice.

We collect information about you either during your referral process, and throughout your time as a customer, when relevant and necessary.

We may collect the following information from you:

- Basic personal information: *Name, address, postcode and contact details (we may also collect this information from any household members)*
- Other personal information: *NI numbers, NHS numbers, Housing Benefit/Universal Credit reference numbers*
- Diversity information: *Age, ethnicity, gender, religion and sexuality*
- Health & disability information: *Details of disabilities or your physical, mental and sexual health*
- Criminal history: *History of criminal convictions and offences*
- Substance misuse history: *History of current or previous substance misuse (i.e. drug/alcohol misuse)*
- Housing history: *History of tenancy both within and outside BCHA*
- Employment history: *History of previous employment*
- Support history: *History of external agencies that you have been or are being supported by*
- Financial & bank details: *Account numbers, sort codes, invoices/receipts*
- Next of kin/emergency contact details: *Name, address and contact details of next of kin or person to contact in an emergency*
- Tenancy case notes and support records: *Dates/notes on visits, correspondence with tenants/third parties, risk assessments*
- CCTV images: *CCTV images retained on 3-week cycles for security*

HOW WE USE YOUR INFORMATION

BCHA takes your privacy very seriously and will only process your personal data in accordance with the terms of this Privacy Notice. BCHA will never sell your information under any circumstance.

We may process your personal information for the following purposes:

- To provide and manage tenancy-based management, support and property maintenance
- To provide and manage individual and community-based support
- To provide walk-in support services
- To source new customers
- To provide you with our publicity and marketing material
- For security purposes (i.e. CCTV images)

We may process your personal information for the following reasons:

- **To fulfil the requirements of a contract between you and us:**
We process your personal data to provide you with our services and to ensure that the requirements of your tenancy agreement are met.
- **To fulfil our legal obligations:**
We process your personal data as part of our legal obligation for business accounting and tax purposes.
- **For a legitimate interest:**
We process your personal information under the legitimate interests' legal basis (e.g. when we use the next of kin details you have provided to us in emergency situations or when we retain CCTV images of our premises). When necessary, we have carried out a Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and the interests of others involved, and any risk posed to you or others involved against our own interests; ensuring that they are proportionate and appropriate.
- **For a public task:**
We process your personal data as part of our contractual obligations to assist local authorities and other statutory agencies (e.g. providing tenancy support, community-based support and walk-in services). In such cases, BCHA may be jointly responsible for protecting your personal data with the local authority or statutory agency funding the services we provide to you.
- **For a vital interest:**
We may process your personal data to protect either yours or someone else's life. We will only process in this capacity in emergency or life-threatening situations.
- **With your consent:**
We process some of your personal information only with your consent (e.g. to provide you with our publicity and marketing and/or for our community-based support services). You are free to withdraw this consent at any time.

WHO WE SHARE YOUR INFORMATION WITH

We may share relevant information about you with the following third parties in order to fulfil our services to you:

- Police, Health & Emergency Services
- Social Services
- Local Authority
- Your service funder, if not one of the above
- DWP
- CCTV providers or Security companies
- Partner Agencies that we work that can provide additional services to you. For example, in Plymouth this includes The Plymouth Alliance partners.
- Your Landlord, if not BCHA

Sharing information with local authorities and other statutory agencies that fund our services is undertaken to allow these funders to monitor contract compliance and performance and to inform the funders' commissioning decisions and plans.

We promise not to disclose or share your details with any other third parties unless there are safeguarding concerns about potential abuse or harm or where an indictable offence may have been committed.

TRANSFERRING YOUR INFORMATION OUTSIDE OF THE EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

BCHA do not transfer or store any personal data outside the EU.

HOW LONG WE'LL KEEP YOUR INFORMATION AND WHERE

BCHA only retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

We hold your personal information for the full extent of your time as a BCHA customer, and then for a maximum of 6 years after you cease to be a customer of BCHA. We are required under UK tax law to hold your data for this time period. After this time period, the personal information we hold about you will be destroyed. Where you have consented to us using your details, we will use your personal

information in ways outlined in this Privacy Notice, unless you notify us otherwise and/or withdraw your consent, at which point we will destroy your details.

We may store your personal information in the following locations:

- On our **cloud-based file server**
- On our **OpenHousing customer database**
- On our **finance accounting systems**
- On our **Inform customer database**
- In a **hard-copy file** in our secure file system

YOUR RIGHTS

You have the right to access the personal information that BCHA processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

Where allowed by law, you may also have the right to:

- request erasure of your personal data (“right to be forgotten”)
- restrict BCHA processing your personal data
- object to any direct marketing from us
- request your personal data is moved, copied or transferred from one IT environment to another (“right to data portability”)

BCHA do not employ any automated decision-making or profiling in relation to your personal data.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

SAFEGUARDING MEASURES

BCHA takes every reasonable measure and precaution to protect and secure your personal data.

We may use the following safeguarding measures to protect your data:

- **Anti-virus software:** We ensure that our computer systems are protected by updating them with effective anti-virus software.
- **Restriction and passwords:** Our file structures are restricted and password protected across our departments in BCHA, to ensure that only relevant staff may access certain information.
- **Encrypted email service:** Where necessary, we use an encrypted email service when transferring sensitive data about you.
- **Locked offices and file stores:** All our offices and file stores are securely locked by a designated person outside of office hours to ensure your personal information is protected.

LODGING A COMPLAINT

If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with either BCHA directly or the UK Supervisory Authority.

Lodging a complaint via BCHA:

Philip Baker
Data Protection Officer
The Factory, 14 Alder Hills, Poole, BH12 4AS
Tel no: 01202 410500
Email: companysecretary@bcha.org.uk

Lodging a complaint via the ICO:

The Information Commissioner's Office
Tel no: 0303 123 1113
Website: www.ico.org.uk

CHANGES TO THIS PRIVACY NOTICE

We will notify you of any changes to the Privacy Notice should they occur, to ensure that you are aware of how we are processing your personal information. Please contact the Data Protection Officer via the details provided above if you have any questions or concerns.