Cyrenians Client Privacy Notice

Coventry Cyrenians provide accommodation and individual support, to promote and enhance the life chances of people in Coventry and Warwickshire, who are homeless or at risk of homelessness. This privacy notice describes how Cyrenians collects and uses personal information about you. It applies to all services where we collect your personal data.

Cyrenians is a data controller of your personal information. This means that we are responsible for deciding how we hold and use personal information about you. It is important that you read this notice so that you are aware of how and why we are using such information.

What personal data does Cyrenians collect?

In order to provide you with the appropriate support, we need to collect specific data about you, including where applicable:

- Your name, address and contact details including proof of your identity and your National Insurance number.
- > Your housing history and information relating to your financial circumstances including income details.
- Details of family and next of kin.
- > Bank details in order to process payments.
- Records of your contact with us, such as phone calls to and from support workers, or notes of contact with you in our client files.
- Current/previous details about your mental, emotional and physical health, offending and anti-social behaviour, background which we may require to tailor our services and may also be used to safeguard our staff.
- Details of any complaints made by or about you if relevant.
- A list of those external statutory and/or volunteer agencies you are or have been engaged with.
- Personal information we have obtained from Credit Reference Agencies and Fraud Prevention Agencies e.g. defaults, CCJs, financial history and situations.

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- Information about your age, gender, race or ethnicity, religious beliefs, and sexual orientation.
- Information about your health including any medical condition.
- Information about disabilities or vulnerabilities, to tailor our service to better meet your particular needs.
- Financial information to help resolve arrears payments, and optionally to provide welfare and benefits advice to help you budget and pay your bills. We may also use this information to apply for funding on your behalf.
- Information about criminal convictions and offences.

Cyrenians may need to obtain, or validate, information with other external sources, such as health professionals, councils, previous housing, care and/or support services providers and government departments such as Benefits Office, Inland Revenue or Criminal Justice agencies.

We have installed CCTV systems around some of our premises. These CCTV systems are for the purposes of public and employee safety and crime prevention or detection. In all such locations, signs are displayed notifying you that CCTV is in operation.

Where does Cyrenians collect this personal information from?

We'll collect this information from the following general sources:

- > From you directly and from any family members or beneficiaries of products and services.
- From third party organisations, who transfer your personal information to us when Cyrenians operates a service that a third party previously operated.
- ➤ From trusted external sources such as DWP, HMRC, Fraud Prevention Agencies and organisations to assist in the detection and prevention of crime, including police, criminal justice agencies and law enforcement agencies.

Why Cyrenians collects your personal data

We use your personal data for the following purposes:

- ➤ To provide a comprehensive and professional service that meets your needs and takes into account any risks.
- To issue accommodation agreements.
- > To analyse/improve our services and report our performance to regulators, funders and our Board of Trustees.
- > To comply with legal and regulatory obligations.
- Where we need to protect your interests (or someone else's interests).
- > Where it is needed in the public interest or for official purposes.

Processing your personal data allows Cyrenians to:

- Determine the terms of agreements in place between us.
- Administer the agreement we have entered into with you.
- Maintain accurate and up-to-date records and contact details.
- Operate and keep a record of complaints.
- ➤ Review our services to ensure we are acting fairly and complying with our responsibilities under the Equality Act 2010.
- ➤ Identify and resolve any inaccuracies in data held by Cyrenians to ensure fair processing of accurate information.
- > Review and identify possible areas for service development and improvement.

We may process special categories of personal information in the following specific circumstances:

- In limited circumstances, with your explicit consent. If we need your consent we will contact your separately about this.
- Where we need to carry out our legal obligations.
- Where it is needed in the public interest, such as equal opportunities monitoring.

What are Cyrenians legal grounds for processing your personal information (including sharing it with others)?

We rely on at least one of the following lawful purposes for using your personal information:

- Where it is needed to provide you with accommodation and support services.
- > Where it is in our legitimate business interests to do so.
- To comply with our legal obligations.
- With your consent or explicit consent.
- For a public interest.

All personal information is held securely and only accessed by those with a legitimate business interest to access it. We have put into place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

For how long does Cyrenians keep personal data?

We will keep your personal information for as long as you are accessing our services. If you no longer receive services from Cyrenians, we will retain your information in line with legal/regulatory requirements or guidelines.

Your rights under data protection laws

You have a number of rights over the way in which we process your personal data and these are listed below. If you wish to use any of your rights, we will explain at the time if they are valid or not:

- The right to be informed. This Privacy Notice and subsequent updates serve this right.
- ➤ The right to request access to your personal information by completing a Data Subject Access Request form. This is available from your support worker or by contacting to us at the address at the bottom of this notice.
- ➤ The right to have personal data corrected or made complete. If you feel the information we hold is incorrect or incomplete, please contact your support worker and they will help to make sure that the information is updated.
- ➤ The right to have personal information erased. You have a right for personal information to be erased as long as it is not essential to the service we provide to you. If you believe that some or all of your personal data should be deleted, you can contact Cyrenians through a Data Subject Access Request form.
- > The right to object to processing of your personal information.
- ➤ The right to restrict processing of your personal information. This enables you to ask us to suspend our processing of your personal data. For example, if you want us to establish its accuracy, or the reason for processing it.
- ➤ The right to move, copy or transfer your personal information to another party as long as this does not affect any service Cyrenians is contractually or legally obliged to deliver to you.
- ➤ The right to query automated decision making, which may have a legal impact or significant effect. The services Cyrenians provide do not include any automated decision-making processes.

We will need to request specific information from you to help us confirm your identity so that you can exercise any of these rights. This is a security measure to ensure that personal information is only disclosed to the person who proves that they have a right to access it.

If you believe that Cyrenians has not complied with your data protection rights, you can

complain to the Information Commissioner's Office via the following website: (https://ico.org.uk/concerns/handling).

What if your personal data changes?

You should tell us when your personal data changes so that we can keep our records up-to-date and accurate. Please contact your support worker or contact us through our email address, info@coventrycyrenians.org, and we'll update your records if we can.

Transferring personal data outside of the UK/European Economic Area (EEA)

We are a UK based organisation and we do not transfer your data outside of the EEA.

Residents living in a property owned by a Private Registered Provider

If we are providing a service to you and you are living in a house owned by a Private Registered Provider the information contained in pages 5-6 below applies to you.

Changes to this Privacy Notice

We may change this privacy notice from time to time in order to reflect changes in the law and/or our privacy practices. You will be able to access the latest privacy notice via our website www.coventrycyrenians.co.uk

What if you're not happy with this Privacy Notice

Coventry Cyrenians has a Data Protection Officer whom you can contact if you have any concerns about this Privacy Notice or concerns in the way we have processed your personal data. You can contact them by writing to us at Coventry Cyrenians, Oakwood House, Cheylesmore, Coventry, CV1 2HL or phone on 024 76228099 and ask to speak to the DPO.

Client Signature:				
<u> </u>				
Data				
Date:	 			



COntinuous REcording of Social Housing lettings and Sales (CORE)

Information for tenants of new social housing lettings or sales

HOW ARE WE USING YOUR INFORMATION?



If your household has entered a new social housing tenancy, social housing providers will share your personal information with the Ministry of Housing, Communities & Local Government for research and statistical purposes.

HOW IS THIS INFORMATION PROVIDED?



The information is provided via CORE (COntinuous REcording), a website funded and managed by MHCLG. It collects information on the tenants/buyers, tenancy/sale and dwelling itself. Some of this information is personal and sensitive so MHCLG is responsible for ensuring that all data is processed in line with Data Protection legislation.

WHY ARE WE SHARING THIS INFORMATION?



Information collected via CORE is shared with other Government Departments and Agencies. Data is shared with the Greater London Authority and the Homes and Communities Agency. CORE data providers can also access data for their organisations via the CORE system. Data is only shared for research and statistical purposes.

HOW DOES THIS AFFECT YOU?



It will not affect your benefits, services or treatments that you get. The information shared is anonymous and handled with care in accordance with the law. We are collecting and sharing your information to help us understand better the social housing market and inform social housing policy.

IF YOU WANT TO KNOW MORE...

CORE Data is collected on behalf of the Ministry of Housing, Communities and Local Government (MHCLG) for research and statistical purposes only. Data providers do not require the consent of tenants to provide the information but tenants have the right to know how and for what purpose your data is being collected, held and use. The processing must have a lawful basis which, in this case, is that the processing is necessary for the performance of a task carried out in the public interest to meet a function of the Crown, a Minister of the Crown or a government department.

You have the right to object and you have the right to obtain confirmation that your data is being processed, and to access your personal data. You also have the right to have any incorrect personal data corrected.

The information collected via CORE relates to your tenancy, the dwelling you are living in or buying, and your household. Some of the information may have been provided by you as a tenant when signing the new tenancy or buying your property; other has been gathered from the housing management systems of social housing providers. Data collected will be held for as long as necessary for research and statistical purposes. When no longer needed, data will be destroyed in a safe manner.

We are aware that some of the data collected is particularly sensitive: ethnic group; previous tenure in hospital or prison/approved probation hostel support; if household left last settled home because discharged from prison/ long stay hospital/ other institution; or if source of referral is probation/ prison, youth offending team, community mental health team or health service. Please rest assured that all the information collected via CORE is treated in accordance with Data Protection requirements and guidelines.

Data is published by MHCLG in aggregate form on an annual basis as part of a report and complementary tables. To access the annual publications on lettings please visit https://www.gov.uk/government/collections/rents-lettings-and-tenancies;

To see the publications on sales please visit https://www.gov.uk/government/collections/social-housing-sales-including-right-to-buy-and-transfers

CORE data is shared with other public sector bodies for research and statistical purposes only. For example, data is shared with Homes and Communities Agency and the Greater London Authority to allow them to exercise their role in providing adequate social housing. The detail level data is anonymised and protected to minimise the risk of identification and deposited with the UK Data Archive for research purposes.

If you are unhappy with how any aspect of this privacy notice, or how your personal information is being processed, please contact Department Data Protection Officer at: dataprotection@communities.gsi.gov.uk and if you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO): https://ico.org.uk/concerns/