**PENRHOS CORNER PRIVACY NOTICE (aka Fair Processing Notice)**

This Privacy Notice explains how we process your personal data, what we do with it, who we share it with and what rights your rights are.

**1. Who we are:**

Penrhos Corner is a scheme within North Wales Housing, who are the ‘Data Controller’. For further details about how North Wales Housing process your personal data, please see North Wales Housing’s full Privacy Notice @ <https://www.nwha.org.uk/about-us/data-protection/> .

**About Penrhos Corner –**

We help you by providing accommodation and support to benefit your mental wellbeing

Penrhos Corner provides supported accommodation if you have a housing need and are recovering from, or have, a long-term mental health issue.

If you are referred to us by the Housing Support Grant via the local Community Mental Health Team or Conwy County Borough Council (Housing Solutions Team) and want to work with us, we will give you a full explanation of our service at a meeting with a member of staff and we will write a personal Support Plan with you.

**We will:**

* Hold weekly meetings with you to discuss your support needs and review your Support Plan regularly.
* Work closely with your Social Worker or Community Psychiatric Nurse (if you have one), or other relevant agencies, to support you.

**According to your personalised needs, we can support you to:**

* develop good independent living skills such as cooking, shopping and cleaning
* become confident in managing your money by budgeting
* access health and social care
* contact other relevant organisations for support and advice
* access education, employment, training and voluntary opportunities
* become a part of a wider community
* complete housing applications and contact landlords and hostels
* prepare and move on to your own accommodation
* build healthy relationships, and make sure you are not discriminated against

As you move forward, we will support you as you to plan for the future and help you with housing applications. During your time with us, we are committed to ensuring your physical and emotional safety and offer access to staff support during weekdays.

Services are provided in accordance with the commissioning body Conwy County borough Council, who are a data controller in their own right, see <https://www.conwy.gov.uk/en/Council/Access-to-Information/Privacy-Notices/How-Conwy-County-Borough-Council-uses-your-Information.aspx> for more details.

We also work in closely with Adferiad, who are jointly facilitating a service provision to you with us in our scheme and a data controller in their own right, see <http://www.adferiad.org.uk/privacy-policy/> for more details.

**2. How we collect information about you**

**When you interact with us directly:** This could be if you ask us about our activities, register with us for an event, ask a question about support services, access our support services or otherwise provide us with your personal information. This includes when you phone us, visit our website, message, get in touch through the post, or in person.

**When you interact with us through third parties or our partners:** This could be a referral from your local authority or another partner agency that work with us. In these instances, we will then contact you directly to offer our services to you.

**3. Information we collect about you**

The personal data we collect about you may vary, depending on the circumstances of your case and our involvement. However, you can typically expect us to collect your:

* name;
* contact details;
* date of birth;
* next of kin details;
* children’s details;
* gender;
* national insurance information;
* bank or credit card details (where you provide these to make a payment);
* details of activities on our website(s) and about the device you use to access these, for instance your IP address and geographical location;
* health, social care and support needs;
* age, sexual orientation, religion and beliefs, nationality and ethnicity information (for equality monitoring purposes);
* criminal offence data;
* health/medical data;
* disability details;
* language preferences;
* employment status, welfare and financial situation;
* housing history; and
* background information (i.e, personal and family history).

You are under no obligation to provide such information. However, the information above is considered necessary to provide you with support services and if you choose to withhold requested information, it will affect the service(s) we can deliver.

**Call Recording**

All calls processed through our BT Cloud App are subject to call recording (inbound and outbound). The primary purpose for call recoding is for training and awareness.

Recorded calls will also be used for quality monitoring and/or complaint handling and used to protect staff from false allegations aggressive, inappropriate, or vexatious callers and as evidence in Anti-Social Behaviour (ASB) cases.

Ordinarily, calls recorded will be retained for 90 days, unless the recording is downloaded for use for one or more of the above purposes – in which case it will be subject to North Wales Housing’s Document and Data Retention Policy for that purpose.

NWH process call recording data in accordance with its Call Recording Policy and Data Protection legislation.

**We may also collect:**

* CCTV footage (including audio recordings) at our schemes for the purposes of safeguarding staff and others.
* Any other relevant personal data you chose provide to us with.

**Special Category Data**

Certain types of the personal information we collect are classed as ‘special category’ data under data protection laws. Examples of this type of sensitive data would be information about health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information.

Where we collect relevant special category data about you, we rely on the Social Protection purposes condition under Article 9 (2) (b) of the GDPR, and Schedule 1 Part 1 (1) of the Data Protection Act 2018 for this type of data and criminal offence data.

Where we collect equality and diversity information (race, ethnic origin, religious/philosophical beliefs, disability data and sexual orientation), we rely on Schedule 1 Part 2 (8) of the Data Protection Act 2018 (Equality of opportunity or treatment) as this type of data is used in reporting to Welsh Government and feeding in to the regional strategic approach to promoting equality and diversity through sharing reporting data with the North Wales Registered Social Landlords Equality Partnership (NWREP).

**4. How your information is used**

North Wales Housing uses the information you provide to us for one or more of the following purposes to:

* provide you with the services or information you asked for;
* keep a record of your relationship with us;
* respond to or fulfil any requests, complaints or queries you make to us;
* understand how we can improve our services or information by conducting analysis and research purposes;
* manage our activities/events;
* check for updated contact details against third party sources so that we can stay in touch if you move;
* send you correspondence and communicate with you;
* process applications for funding and for administration of our role in the projects we fund;
* generate reports on our work, services and activities;
* safeguard our staff and volunteers;
* conduct due diligence;
* conduct training and quality control;
* audit and administer our accounts;
* perform contracts between you and us;
* meet our legal obligations to regulators, government and/or law enforcement bodies;
* establish, defend or enforce legal claims; and/or
* fulfil a legitimate interest

**5. Who your information is shared with and why**

North Wales Housing work in partnership with the following agencies and will share your information with them as part of delivering our service(s) to you:

|  |  |
| --- | --- |
| **Organisation** | **Why** |
| **Adferiad** | To ensure that both agencies can support you effectively,  the type of information shared include:  Referral, Risk Assessment documents, file notes and support plans. | |
| **Betsi Cadwaladr University Health Board (BCUHB)** | For any support agreed with you regarding your health. |
| **Colleges and places of skills and learning** | For additional information (where you have enrolled on a course) and relevant learning opportunities. |
| **Betsi Cadwaladr University Health Board (BCUHB) – CPNS** | For any support agreed with you regarding your mental health. |
| **Conwy Council Social Services Wellness Team – Social Workers** | For any support agreed with you regarding your wellbeing. |
| **Conwy County Borough Council – the Commissioning Body** | Any information relating to the Housing Support Grant contract including; outcome data, a range performance indicators and associated financial information relating to the grant allocated by the Council. | |
| **Conwy Voluntary Services Council (CVSC)** | To support you to access volunteering opportunities |
| **Cyfle** | To support you to access volunteering opportunities | |
| **Department of Work and Pensions (DWP)** | Receiving rent/benefit payments / Preventing homelessness. | |
| **NEWREP** | For the purpose of feeding into the regional strategic approach to promoting equality and diversity through sharing reporting data with the North Wales Registered Social Landlords Equality Partnership (NWREP). | |
| **North Wales Fire And Rescue Service** | For relevant signposting of fire safety and any necessary referrals to promote the health and safety of the scheme. |
| **North Wales Police** | To assist with any prevention and detection of crime and for community and scheme safety. |
| **Welsh Government** | In order to access Public funding and evidencing use of funds, sharing statistics and reporting. | |

North Wales Housing may also disclose personal information if required to do so by law or if it believes in good faith that such action is required by law.

Where there are safeguarding concerns for your welfare or that of someone else, particularly the welfare of a child, (where possible) we will talk to you first before taking action sharing information with the appropriate authority.

**6. How long we keep your information for**

North Wales Housing will only keep your information for a long as is reasonable and necessary for the relevant activity, which may be to fulfil our legal obligations (i.e. a statutory retention period). As a standard, we will retain personal information on your record with us for 7 years or indefinitely, where there safeguarding concerns.

**7. How we keep your information safe**

North Wales Housing places great importance on the security of your information. We have physical, technical and organisational security measures in place to protect against the improper access, loss, misuse and alteration of personal data under our control (for example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to your personal information).

**8. Lawful basis for using your information**

**Performance of a contract / take steps at your request to prepare for entering into a contract**

This will typically be the basis we rely on when processing your personal data in order to provide you with a service or fulfil our obligations under an agreement we have with you, or where we are entering into a contract with you.

**Legal Obligation**

In certain circumstances, such as when you sign up to our scheme/service, we have a legal obligation to undertake identity checks in order to prevent fraud. As a Registered Social Landlord we also have certain duties imposed on us by law, such as Health and Safety, that require us to collect and process personal data in order to comply with those legal obligations.

**Legitimate interests**

We have a basis to use your personal information if it is reasonably necessary for us to do so, providing that what the information is used for is fair and does not unduly impact your rights.

An example of processing in our legitimate interests would be where we contact you to offer our services, following a referral received from a third party.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others’) interests in us using your information in this way.

**Consent**

Consent is relied on where we ask you for permission to use your information in a specific way, and you agree to this (for example where you complete a Form of Authority agreeing for us to contact an agency/organisation on your behalf). Where we use your information for a purpose based on consent, you have the right to withdraw your consent at any time.

**9. How we will communicate with you**

North Wales Housing needs to communicate with our tenants, residents and service users under the lawful basis of contract. This will usually be in writing, via email or by telephone. This communication will be linked with service delivery.

We will only discuss or communicate your tenancy or lease details with those named on the agreement or those authorised (temporarily or permanently) by you. You can authorise someone temporarily (verbally over the phone) or permanently (in writing).

You can also choose to communicate via our chat bot and live chat via the [website](https://www.nwha.org.uk/) .

**‘Marketing Communications’ linked closely to our values**

North Wales Housing will send you communications about the following:

* Opportunities at NWH, including tenant engagement, training, and events
* Jobs, careers, volunteering and work experience opportunities
* Additional information including health and wellbeing
* Keep you informed about what’s going on at NWH e.g. receive our tenant newsletter Clwb Seren.

We consider sending Marketing Communications to you via email and text to be within our legitimate interests. However, we recognise that not everyone wants to be contacted like this. If you don’t want to be contacted in this way you can contact us with the subject ‘OPT OUT’.

There is no intention of marketing third party products or services to you.

Anything promoted will be free and clearly outlined for social benefit or promoting wellbeing.

**10. Your rights, the right to complain and the ICO**

**Rights of access, correction, erasure, and restriction**

**Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during your relationship with North Wales Housing.

**Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

* **Request access (commonly known as a "Subject Access Request"**. This enables you to request a copy of the personal information we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
* **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer and request a copy of the Subject Access Policy and Form or download the form at <https://www.nwha.org.uk/about-us/data-protection/> .

**Right of Complaint and the ICO**

You have the right to complain about any matter relating to our service, including how we use your personal data: In the first instance please contact our Customer Services team. If you wish to make a complaint, raise a concern or ask a question about your personal data, you can do so by contacting the Data Protection Officer on: 01492 572727 or via e-mail [Gareth.roberts@nwha.org.uk](mailto:Gareth.roberts@nwha.org.uk) .

If you are still not happy with our service you may complain to the Public Services Ombudsman Service at <http://www.housing-ombudsman.org.uk/> .

If you wish to complain about our use of your personal data, you may complain to the UK

Information Commissioner’s Office (ICO) at: 2nd Floor, Churchill House, Churchill Way, Cardiff CF10 2HH

Telephone: 016 2554 5297 – Welsh Language Operators also available

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

Website: <https://ico.org.uk/>

**11. Review and Changes to this Privacy Notice**

North Wales Housing’s Privacy Notice is regularly kept up to date with changes in the law and will be reviewed annually. This version was updated on **27th January 2022.**

The latest full version will be available on our website at <https://www.nwha.org.uk/about-us/data-protection/>