



Action Homeless (Leicester) Ltd (“Action Homeless”)

PRIVACY NOTICE FOR CUSTOMERS

What is the purpose of this document?

Action Homeless is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you. It provides you with certain information that must be provided under the **General Data Protection Regulation (GDPR)**.

You are being sent a copy of this privacy notice because you are a prospective or existing customer.

Action Homeless is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The contact details for Action Homeless are:

Action Homeless (Leicester) Limited, Central Services, Ridgway House, Little Hill, Wigston, Leicester, LE18 3SE. Telephone: 0116 2211851. Email: info@actionhomeless.org.uk

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.



5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Your name and surname;
- Any former addresses or locations you may have been residing at prior to becoming homeless;
- Identification documents, if you have them;
- Family details and next of kin contact details in the event of an emergency;
- National Insurance number and details necessary to register you for benefits entitlement;
- Relevant details regarding your personal history and the causes of your homelessness. This might include information that relates to:
 - Relationship breakdown;
 - Mental or physical ill-health issues and history;
 - Criminal offending history;
 - Drug or alcohol addiction or dependency;
 - Other reasons relevant to the reason for your homelessness.
- Any support needs you will need whilst we seek to provide you with housing;
- Details of any third-party support providers who have provided support to you;
- Details of your GP (if registered) or we may help you register with a local GP;
- Details provided by any local authority or law enforcement agencies that may be relevant to your support needs or our duty of care towards you or other customers;



- Details of outside agencies that we introduce you to or which have been brought in to provide you with your support needs;
- Details of any incidents involving or affecting you whilst customer of ours;
- Any details kept on file pertaining to previous housing we may have offered you as a former customer of ours;
- Bank account details;
- Benefits details;
- Rent and rental payments (including arrears) history and debt history;
- The location we place you in for housing;
- Details of referrals, if we refer you to another organisation;
- Details of any complaints made by you or by others about you;
- Any dietary or allergy information we need to be aware of whilst you are a customer of ours;
- Any risk assessments we or others may carry out concerning you to assess your suitability for any project managed by us;
- Details of any warnings (or previous warnings) issued to you whilst based at any of our projects;
- Details of drugs/medicines prescribed;
- Details of probation officer (if relevant);
- Details of employment history and (if relevant) present employers and details of any income earned (including copy wage slips);
- (if relevant) details of any children who will be resided with you – if housed at our domestic violence project
- (if relevant) details of your child's support needs – if housed at our domestic violence project;
- Assessment for your suitability for any of our projects;
- Details relevant to our health and safety duties and our duty of care towards you whilst a customer of ours;
- Details of any accidents whilst on any of our premises;
- Details of tenancy and landlord details (if not the Company);
- Details of support case note actions regarding support provided to you;

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



- Information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation and political opinions.
- Information about your health (physical and mental), including any medical condition, health and sickness records and medical history.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information from you when you first present yourself to us as a prospective customer and we complete an assessment of your needs and make a decision about whether you are suitable for housing at one of our projects. Part of this assessment is to understand your history and support needs so that we can ensure you are properly supported whilst with us as well as ensuring we satisfy our duties of care towards you and our customers and employees.

We will also collect personal information from you if we accept you as a customer at one of our projects and during your stay with us.

We will also retain certain personal information on you if you cease to be a customer.

Much of our personal information will be contained in confidential customer files that we keep and will also be placed on our client data management system.

How we will use information about you

We will only use your personal information we collect about you to:

- Assess your suitability for any of our projects;
- Carry out background checks, where applicable;
- To help us understand the causes of homelessness to help us in our fight to prevent homelessness;
- To ensure we can satisfy our duty of care towards you as a customer and towards our other customers and employees and visitors;
- Communicate with you during your stay with us as our customer;
- To help us manage any issues with you whilst our customer (including the management of any complaints);



- Keep records related to your stay with us;
- Comply with legal or regulatory requirements;
- To satisfy our safeguarding obligations and to ensure that we comply with social protection laws;
- Making a decision about whether to accept you as a customer.
- Keeping records of your rental payments and making sure you are getting access to the correct benefits to support you;
- To ensure that you receive the correct support needs;
- To ensure you are put in touch with the correct agencies;
- Checking you are legally entitled to live in the UK;
- Checking you comply with our policies and procedures and rules relating to each of our projects;
- To deal with any emergencies;
- Ensuring your safety and the safety of others;
- Dealing with health and safety duties;
- (if relevant) ensuring your child is safe and has the appropriate support needs in place – if at our domestic violence project;
- (if relevant) dealing with your child’s education and development needs whilst at our domestic violence project;
- Making decisions about terminating your stay with us;
- Understanding the reasons for you leaving our projects to assess better the cycle of homelessness;
- To understand the side-effects of any medicines or drugs you may be prescribed;
- To enable us to enforce any rules, policies and procedures relevant to your stay with us;
- To help you find employment and to sustain permanent housing;
- To communicate with local authorities and third party funders to account for how we use funds and grants for the services we provide.

We rely on one or more of the following legal grounds for processing your personal information:

- Where we have sought your consent;
- Where it is necessary to perform our contract with you as our customer;



- Where it is necessary to comply with our legal obligations;
- Where it is necessary to protect your vital interests or the vital interests of another individual;
- Where it is necessary for the performance of a public interest task; and/or
- Where it is necessary for our legitimate interests (or the interests of a third party) except where such interests are overridden by your fundamental rights and freedoms.

Our legitimate interests include:

- Acting as a charity involved in providing housing for homeless and vulnerable people;
- Acting as a charity that manages a domestic violence project which houses women with young children;
- As a business and charity and the need to manage and organise our work and resources and people;
- Acting as a charity which is highly regulated;
- As an employer employing people to provide our services;
- As an owner of properties;
- As a landlord;
- As a manager of properties owned by third parties (e.g. Housing associations);
- As a business that receives funding and grants from the local authorities/third party funders;
- Protecting our customers who are vulnerable and present with a range of health and other issues (including addictions) and who have multiple and complex needs.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application, we may not be able to accept you as a customer or to house you. This may mean that we are unable to help you.

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require higher levels of protection. This information includes the following information: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation.



In some situations we may seek your explicit consent to use Special categories of personal data. When we do so, we will make this clear and also provide information as to how you can withdraw that consent.

In most situations, we will not need your consent to use special categories of personal information.

We will use special categories of personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments to any of our premises or services.
- We will use information regarding your mental or physical health (which might also include details of any drug or alcohol addictions or dependencies) to ensure that we can comply with our duty of care to you and others; to comply with our health and safety obligations; and to comply with our obligations under social security or social protection laws (where we deal with a range of customers with multiple and complex needs);
- We will use information about your racial or ethnic origin, religious or philosophical beliefs, health or your sex life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting and to ensure that our services are inclusive to all in accordance with the public interest.

Information about criminal convictions

We may receive information about any previous criminal convictions when you present to us as a prospective customer or whilst you are a customer. We require this information as part of our legitimate interests and need to comply with our legal obligations. We also need this information to comply with any social protection laws, which includes (but is not limited to) managing our duty of care to you and to other customers and our employees.

We will ensure that we have in place appropriate safeguards when processing this type of information.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.



What about other third parties?

We may share some of your personal information with other third parties as part of providing our services to you or ensuring that your support needs are met. Those third parties may include:

- Law enforcement agencies (including the police (when relevant));
- Local authorities (e.g. for housing benefit applications or other benefits);
- Statutory Housing Associations;
- Other voluntary associations if partnering with them for support needs;
- Third party support and medical providers – carers, support workers, counsellors, GPs, support agencies etc;
- Probationary service (if relevant);
- Social workers;
- Hospital/health community teams;
- Moneywise Plus (if relevant to you);
- Other third parties on a need to know basis who are necessary to help us provide our services and support to you.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

Whenever we share personal information with a third party we ensure that appropriate safeguards are in place and your information is held securely and only used for the purposes for which we have shared it.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third



parties who have a business or legitimate need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We operate In-Form which is a client relationship and service management system provided to housing and homelessness organisations. We will input data (including, where necessary Personal Data) into In-Form to monitor our services and performance from time to time. The data from In-Form is stored and backed up on Salesforce EU data centres and some data may be transferred to Salesforce servers outside the EEA for backup purposes. Salesforce is a certified member of the US-EU Privacy Shield Framework which provides a mechanism to comply with EU data protection requirements which is deemed adequate by the European Commission.

Data retention

How long will you use my information for?

We will retain your personal information for no longer than is necessary for the purposes for which the personal information has been collected.

The criteria we consider when deciding how long we retain personal information includes (but is not limited to):

- The purpose for which we hold your personal information;
- The amount, nature and sensitivity of the personal information;
- The potential risk of harm from unauthorised use or disclosure of such personal information;
- What alternative means we have for achieving our purposes;
- The legal limitation periods for bringing claims and whether we need the personal information to bring or defend any proceedings;
- Any legal or regulatory requirements for the retention of your personal information;
- What our insurance terms require in relation to the retention of personal information;
- The requirement of our funders or grant providers;
- Any specific requests to hold such personal information from you



- Satisfying any legal, accounting or reporting requirements;
- Any orders for preservation of evidence, including your personal information.

Your individual rights

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive 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 Tammy Bolton, HR Manager in writing using the contact details above.

No fee usually required

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



What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where we have relied on your consent for the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Tammy Bolton, HR Manager using the contact details above. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Person responsible for managing data at Action Homeless

We have appointed Reg Mawdsley, Finance Director to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Reg Mawdsley using the contact details above. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Reg Mawdsley or Tammy Bolton using the contact details above or speak to any of our employees in the first instance.