

YMCA Trinity Group – Accommodation Privacy Notice

1. Who and what does this Privacy Notice apply to?

YMCA Trinity Group (“we”, “our”, “us”) is committed to protecting and respecting your personal information. This privacy notice describes how we collect and use personal information in relation to the provision of YMCA Trinity Group accommodation

Personal information means any information about an individual from which that person can be identified, and includes identifiers such as a name, an identification number, location data, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.

YMCA Trinity Group acts in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”). References in this privacy notice to “personal information” include “personal data” as defined and used in the GDPR.

This privacy notice applies to you if you make use of any of our accommodation services, or apply to do so.

Throughout this Notice we refer to “our retention schedule”. This is a list of record types, how we keep them and how long for.

2. How we collect personal information

We collect information from applicants, from current residents whilst they are receiving services, from residents as they leave our services and from other people who use our buildings such as gym users and nursery clients. Residents and other visitors may be recorded on our CCTV system that is operated for safety and security reasons (see our section on CCTV, below).

When you apply to live in one of our housing schemes we access the information you have either provided to City/County Council or that Social Services hold about you. If you have applied directly to us then this information is solely what you have told us about you and your housing/support needs.

When you give us personal information yourself we become the “controller” of that information. When your personal information is passed to us by another person or organisation then we are the “processor” of your information.

3. How we use your information

We use your personal information in order to:

- inform our decision as to whether we can accommodate you
- Make allocations of flats or rooms

- Manage licences or tenancies
- Operate rent accounts
- Provide repairs and maintenance services
- Provide residents with support which help achieve the aim of independent living skills
- Prevent crime, anti social behaviour and resolve disputes between residents and neighbours
- Engage with residents and make improvements to our services
- Promote equal opportunities and fair treatment for all people
- Provide information (e.g. about products or services) that you request from us

We will only use your personal information to the extent that we are allowed to by law. We will rely on the following legal bases in order to process your personal information:

- where you have given your consent;
- where it is necessary to perform the contract (such as a licence or tenancy agreement) we have entered into, or are about to enter into with you;
- where it is necessary to comply with a legal obligation; and/or
- where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests and fundamental rights and freedoms do not override those legitimate interests.

4. Personal information

We understand that all people have personal information that they might not wish others to know or be made public. This private information is treated with particular care by YMCA Trinity Group. This may include information relating to physical or mental health, sexual orientation, and what you believe. We minimise how much of this private/personal data we hold and what we use it for. However there are times that we need to use it e.g. to support victims of hate crime or unfair treatment or to make sure our services are tailored to your needs. We may also use this information to manage and minimise risks to you and others.

When we collect this type of data we will tell you how we will use it including who it may be shared with, if anyone.

When processing your private/personal data, we may rely on one or more of the following legal grounds for processing:

- where you have given explicit consent;
- where it is necessary for the purposes of carrying out our obligations under social security and social protection law; and/or
- where it is necessary to protect your vital interests, or the vital interests of another individual.

We may also collect data concerning criminal convictions and offences. We will only use this information where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations.

5. Your Image

We take your photograph when you move in and store this electronically against your rent account details on our housing management software. We use this to identify you as we employ a range of staff including bank and agency workers. We may also use it to assist the police if you go missing.

Only authorised staff employed by the YMCA can see this image. It will not be shared with anyone else unless we are obliged to by law.

6. CCTV

We also use CCTV in the shared areas of most of our schemes e.g. corridors, car parks, entrance hallways. If you use these areas your image may be collected by CCTV. We have a separate policy about how we use CCTV and protect/use the images we collect. You can request a copy of this policy by asking your key staff member.

7. Sharing Your Information

Your personal information is held securely by us and is kept confidential. Usually we will not disclose your personal data without your consent. However we may share relevant information with:

- The Local Authority (for example in relation to housing benefit payments or council tax liability)
- Social Services who commission us to provide housing and support services
- The Police (we will only do this when required by law or in the interests of detecting crime)
- Other landlords that you have authorised to seek a reference from us when you are ready to move on

We may also disclose your personal information if we are under a duty to disclose such information in order to comply with any legal obligation, or in order to enforce or apply our other agreements (for example, our tenancy agreements), or to protect the rights, property or safety of YMCA Trinity Group, our staff, or others.

8. Security Of Your Information

We have an IT Security Policy that sets out how our computer systems protect your data. You can request a copy asking your key staff member.

9. How Long do we Keep Your Information

We will only keep your personal information for as long as is necessary to fulfil the purposes for which we collected it, and in accordance with our retention schedule. A copy of the schedule is available on request. If you would like to see a copy, please ask your key staff member.

If your application for accommodation is successful, we will keep your personal information for as long as you remain a resident of one of our properties, and for a period of 6 years after you have left. This is because any money paid to us on your behalf such as Housing Benefit may be recovered by the Local Authority within this time period.

If we decide we cannot accommodate you then we will only hold your information whilst we are making the decision. After the period of appeal has expired, the information is destroyed. We may keep some anonymous statistical data such as your Date of Birth but not any information that can be used to identify you.

10. Your Rights

Under the GDPR, in certain circumstances you have the right to:

- See your data, and receive a copy of the personal data we hold about you. To exercise this right, you need to submit a Subject Access Request.
- Request that your data to be removed from our records.
- Request correction of the personal data that we hold about you.
- Object to the processing of your personal data.
- Request the restriction of processing of your personal data.
- Request the transfer of your personal data to another party.

If you would like more information on these rights or wish to exercise any of these rights, please submit your request to the senior Housing or Accommodation Manager responsible for the scheme that you lived in or applied to. You can get this persons contact details by asking your Project Worker/Engagement Officer or by emailing admin@YMCATrinity.org.uk.

If you submit a request that your data be removed and we are unable to remove all your data (for legal reasons), we will inform you of this in writing, including the reasons why.

11. Complaints or Enquiries

We aim to provide the highest standards of service in all areas of our business. We take complaints seriously and use them as an opportunity to rectify things and improve services for the complainant and others.

If you make a complaint or suggestion for improvement we may store personal information in relation to the matter. When the matter is resolved we will destroy these records in accordance with our retention schedule.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO"). If you have any concerns about the way in which we process personal data, please do contact us. Alternatively, you can contact the ICO. Their contact details are available here: <https://ico.org.uk/make-a-complaint/>

12. More Information

You can learn more about your rights in relation to the handling of your personal information from the Information Commissioners Office.

www.ico.org.uk

13. Changes to our Privacy Notice

We may make changes to this privacy notice. The current version will always be available both on request and on our website www.ymcatrinitygroup.org.uk.

14. Our Contact Information

If you have any questions, comments or requests regarding this privacy notice, please contact admin@YMCATrinity.org.uk

I understand the terms of this Privacy Statement and accept how it applies to me and my data.

Signed: _____

Date: _____