

Privacy Statement



CHURCH OF ENGLAND PENSIONS BOARD (HOUSING) PRIVACY NOTICE

Your 'personal data' is any information that enables you to be identified - protecting it is extremely important to us here at the Church of England Pensions Board.

This notice tells you why we collect your personal data, what is collected and from whom, how it is used and who it is shared with.

WHO WE ARE

The Church of England Pensions Board is the data controller and decides how your personal data is processed and for what purposes.

WHY WE NEED YOUR PERSONAL DATA

We need to collect, process and store personal data about you and other household members for the fulfilment of our tenancy agreements, contracts and leases and to deliver efficient and effective and appropriate services.

WHAT PERSONAL DATA DO WE COLLECT AND FROM WHOM

We process your personal data so we can deliver services to you. Data we hold will normally have been provided by you (for example on application or enquiry forms or when we communicate with you). However, we may also hold data provided by third parties where this is relevant to your housing circumstances: This includes social workers and health professionals (such as doctors and occupational therapists), Diocesan officials such as Retirement Officers and also from Diocesan and Local Authority Safeguarding teams.

We will only ask for personal data that is necessary for us to deliver our services. In some cases you can refuse to provide your details if you deem a request to be inappropriate but this may impact our ability to provide some services to you. The information we collect about you will include some, or all, of the following:

- Your personal details such as your name, date of birth, gender, contact details (e.g. home address and former addresses, telephone numbers and e-mail address) and identifiers such as National Insurance number.
- Your pensionable service, so as to ensure that you are eligible for the Board's housing.
- Details of your income and capital (with your consent) if you are applying for financial assistance from us and/or to ensure that you are eligible for specific housing or support services.
- Other financial details about you, such as your bank account details for the purposes of collecting rent and other charges.

Privacy Statement



- Details of your household circumstances where this affects your housing needs or your tenancy.
- Information about your physical or mental health (with your consent) when it is needed to assess your eligibility for support (or other) services or financial assistance or welfare benefits.

Please note: Sending information via e-mail is not completely secure; anything you send is done so at your own risk. Once received, we will secure your information in accordance with our security procedures and controls.

HOW WE USE YOUR PERSONAL DATA

Our main legal basis for processing your personal data is to meet our contractual obligations in respect of managing and supporting our tenancy agreements or leases or mortgage agreements. We also rely on our legitimate interests to process data for instance, to ensure that you are eligible for housing or for receiving financial support or to plan future levels of demand on the service and to raise finance, in order to continue to pursue our charitable objectives. We can do that so long as we do not interfere with your fundamental rights or freedoms.

We hold personal data about you for the following purposes:

- To assess housing applications and your eligibility for housing with us and to communicate with you about our services.
- To record information on your health and support needs for example (in our Supported Housing service) for agreeing a Support Plan with you or for providing out of hours emergency support and evacuation planning. Or if you need adaptations to your property.
- To provide advice about your entitlements to financial support and welfare benefits.
- To provide housing management services. For example, deal with reports of anti-social behaviour, neighbour nuisance or complaints;
- To set up payments such as direct debits and for rent collection.
- To arrange services provided by other parties. For example, to provide a repairs service, to apply for a concessionary TV licence if you live in one of our Supported Housing schemes.
- To help us improve our service to customers. The information you provide in surveys will be anonymous unless you agree that we can use your details.
- We also process personal data about your next of kin and other household members that you have provided to us for example for emergency contacts or if they have power of attorney. We process this data on the understanding that you have provided this information with their full knowledge and consent.
- We may capture your image on our CCTV systems if you visit a property which is covered by this facility. Any CCTV recordings will be held in line with our corporate retention policy before being erased.

The other reasons we can rely upon to hold and process your personal information under the Data Protection Act are:

Privacy Statement



- With your specific consent. You can withdraw your consent at any time. This is explained further below in the section entitled 'Your rights';
- Where we are under a legal obligation or an obligation under a contract to process the data;
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person

Where we hold and process 'special' categories of personal data (such as religious beliefs or data concerning health) we are required to meet additional conditions for processing such data. The basis on which we can or may process this data is:

- With your specific consent;
- Where we need to protect the vital interests (i.e. the health and safety) of you or another person for example in respect of safeguarding;
- Where you have already made your personal data public;
- Where we or another person needs to bring or defend legal claims; and/or
- Substantial public interest grounds

WHO WE SHARE YOUR PERSONAL DATA WITH

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations and in line with our corporate retention schedule. For example, if you live in one of our properties we will process your data for the duration of your tenancy or contract and for up to 7 years after.

Normally, only the Board's staff will be able to see and process your personal data. However, there may be times when we will share relevant information with the third parties listed below. We do this for the purposes as outlined above or where we are legally required to do so. Where necessary or required, we may share information as follows:

- With our contractors, in order to undertake repairs, maintenance or improvement works
- With third party service providers, in connection with services performed on our behalf such as solicitors. Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality protocols.
- With community partners, in connection with the delivery of coordinated local services.
- With utility companies and their representatives, in connection with unpaid bills (gas, electricity & water).
- With credit reference agencies and debt collection agencies in relation to any outstanding charges owed once residents leave their home with us.
- With Diocesan officials and post holders, such as retirement officers in relation to supporting applications for housing with us.

Privacy Statement



- With local authorities and government departments, as necessary for administering justice, or for exercising statutory, governmental, or other public functions.
- With police and other relevant authorities (e.g. Probation Service, Department of Work & Pensions, HM Revenues & Customs) in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty.
- With other statutory organisations, e.g. social services and health authorities, as necessary for exercising statutory functions

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life or death situation)

TRANSFERRING YOUR DATA OUTSIDE THE EU

We do not transfer your personal data outside the European Economic Area ("EEA") ourselves but some of our third-party service providers may do so, having obtained our consent first. They are required to only transfer your personal data to a recipient outside the EEA where they are permitted to do so by law and to undertake all reasonably necessary steps to make sure that your personal data is treated securely, and in accordance with this privacy notice.

HOW LONG WE KEEP YOUR INFORMATION FOR

We keep your personal data in accordance with our retention policy. We determine the length of time we keep it for based on the minimum retention periods required by law or regulation. We will only keep your personal information after this period if there's a legitimate and provable operational reason to do so. When no longer needed, we will ensure your personal data is securely destroyed.

YOUR RIGHTS

Unless subject to an exemption under the GDPR, you have the right to:

- a copy of the personal data we hold about you;
- have your personal data corrected if it is inaccurate or out of date;
- have your personal data deleted or removed if it is no longer required by us;
- restrict the use of your data where you contest its accuracy, or its processing by us, is unlawful
- withdraw your consent to the processing at any time, where processing is based on consent;
- request that we provide you with your personal data and where possible, transmit that data directly to another data controller (where applicable). This is known as 'data portability'

Privacy Statement



CONTACTS AND COMPLAINTS

If you have any questions because of reading this privacy notice or wish to exercise any of your rights, please contact us using the email address: gdpr@churchofengland.org.uk or by writing to:

**The Data Protection Officer
National Church Institutions
27 Great Smith St
London
SW1P 3AZ**

We will aim to respond to any request received from you within one month of receipt of your personal data will usually be provided free of charge.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Tel: 0303 123 1113
Email: casework@ico.org.uk**

More information is available on the ICO website at <https://ico.org.uk/>

UPDATES TO THIS NOTICE

We may update or amend this privacy notice from time to time to comply with law or to meet changing business requirements. Any changes made to the privacy notice will be posted on our website <https://www.churchofengland.org/more/clergy-resources/retirement-housing>.

This privacy notice was last updated in May 2018.

For and on behalf of the Church of England Pensions Board

Privacy Statement

