

Privacy Notice



The National Church Institutions (NCIs) - The Church of England Pensions Board (Housing)

Privacy Notice

The Church of England Pensions Board is committed to protecting your personal data. Personal data is any information relating to an identified or identifiable person.

This privacy notice explains what to expect when the NCIs collects your personal information.

1. Data controller

The data controller is **The National Church Institutions (NCIs) - Church of England Pensions Board**

Church House,
29, Great Smith Street,
London, SW1P 3AZ

2. Why we collect and use your personal data

In the Housing Department of the Pensions Board, we collect and use your personal information to carry out the following activities:

- 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 so that we have a contact in the event of an emergency or if they hold power of attorney for you. 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.
- To inform you about the services that we provide. We may also ask our colleagues in the Pensions team, to send information out on our behalf to pensions customers for this purpose.

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3. The categories of personal data we collect:

The types of information we process include:

Personal details such as – your address and contact details, household members, pension and service details, housing needs and circumstances, financial circumstances, bank account details.

Special categories of information that may include:

- religion
- medical, health and support needs
- criminal allegations, proceedings or convictions

We process personal information about current and retired clergy and their dependents.

4. The lawful bases for using your information

We collect and use **personal data** as explained below:

- **Contract:** - we process personal information in order to comply with the terms of a contract such as a tenancy agreement or lease, or in order to be able to enter into a contract, tenancy agreement or lease with you.
- **Legal obligation:** - we process personal information in order to comply with the law
- **Consent:** where you have provided information with your specific consent
- **Public task:** - we must process information about you to perform a task in the public interest, such as information about criminal convictions to comply with Court orders or in respect of safeguarding responsibilities to yourself or others.
- **Legal Claims:** - where we need to bring or defend legal claims or in connection with a judicial process.

5. Who we collect from or share your information with:

Normally, only the Board's staff or the staff of other bodies of the NCIs such as Accounts 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.

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- 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)

Once your information has been collected by an organisation that constitute one of the National Church Institutions (NCIs) it may be used by other NCIs, where necessary, to provide a complete service to you, and we do this on the lawful bases listed (in section 4) above. We share your information internally, to save you providing your information more than once.

6. Location of your personal data

The NCIs do not share your information with countries outside of the UK or EEA without your consent and necessary safeguards.

7. How long we retain your information

There's often a legal and/or business reason for keeping your information for a set period, as stated in our retention schedule.

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.

8. Security of your personal data

We are committed to ensuring that your personal data is secure. We limit access to data on a need to know basis and test our security practices and technologies.

Employees and temporary workers are required to follow policies and procedures and complete mandatory annual training to understand data protection and information security.

If a data breach does occur, we will do everything in our power to limit the damage. In the case of a high-risk data breach, and depending on the circumstances, we will inform you about the breach and any remedial actions to prevent any further damage. We will also inform the Information Commissioner's Office of any qualifying data breaches.

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9. Profiling and automatic decision

Your personal data will not be used for any automated decision making without access to human intervention.

10. Your rights

- You have the following rights regarding your personal data, subject to exemptions:
- The right to request a copy of your personal data
- The right to rectify your data if you think it is inaccurate or incomplete
- The right to request that your data being erased, in certain circumstances
- The right to restrict processing of your data, in certain circumstances
- The right to request that we transfer your data to you or another organisation, in certain circumstances
- The right to object to our processing of your data if the process forms part of our public tasks, or is in our legitimate interests
- To exercise these rights please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

11. Complaints or concerns

If you have any concerns or queries about how the NCIs handle your personal data, please contact the Data Protection Team at:

gdp@churchofengland.org

or

Data Protection Team, Church of England Record Centre, 15 Galleywall Road, London, SE16 3PB, Tel: 020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner at **<https://ico.org.uk/concerns/>** or Information Commissioner's Office, Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF, Tel: 0303 123 1113.