

Privacy Notice
The Church of England Pensions Board
Provision of Housing & Charitable Services

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 you can expect when we collect and process your personal information under the UK and EU General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

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1. Data controller

The data controller is the **Church of England Pensions Board**, Church House, 29, Great Smith Street, London, SW1P 3PS.

The Pensions Board is one of the organisations that make up the National Church Institutions (NCIs). You can find out more about the NCIs at:

www.churchofengland.org/about/leadership-and-governance/national-church-institutions

You can find out more about the Pensions Board at:

www.churchofengland.org/about/leadership-and-governance/church-england-pensions-board

2. Why we collect and use your personal data

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, dealing 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, other household members or named contacts that you have provided to us so we have a contact in 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. All CCTV recordings are held in line with our corporate retention policy before being erased.
- To tell you about the services that we provide, including invitations to events at our supported housing schemes.
- To enable us to put in place risk management arrangements (with other agencies as

- necessary) in relation to any criminal convictions you may hold.
- To forecast current and future demand for retirement housing

3. The categories of personal data we collect

The types of information we process include:

- **Personal details about you and your spouse/partner** such as your address and contact details, pension and service details, housing needs and circumstances, financial circumstances, bank account details.
- **Personal details about any other household members or dependents**, including names, ages, housing needs and circumstances, where this supports or informs your application for housing.
- **The names and/or contact information** for your next of kin or third-party representative, where you have given consent for them to contact us on your behalf, or where they have a legal power of attorney.

Special categories of information that may include:

- religion, including any titles you might hold due to your role or position with the Church of England
- medical, health and support needs
- criminal allegations, proceedings or convictions

4. The lawful basis for using your information

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

- **Contract:** - we process personal information to comply with a contract such as a tenancy agreement or lease, or to be able to enter into a contract, tenancy agreement or lease with you.
- **Legal obligation:** - we process personal information to comply with the law
- **Consent:** where you provide information with your specific consent or give permission for someone to act for you (e.g. a 3rd party representative or through a power of attorney). *You can withdraw your consent at any time by contacting us using the details in Section 11 below. Please be aware that by doing so you may prevent us from delivering some services to you, where these rely on your consent e.g. welfare advice.*
- **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.
- **Vital Interest:** where it is necessary for us to process your data in emergency circumstances.
- **Legitimate Interest:** In certain instances, we rely on our legitimate interest to process

your personal information.

For instance, to contact you about a small, select number of third-party organisations that we believe may be of interest to you, including telling you about any services we provide that might be of benefit.

We have undertaken a Legitimate Interests Assessment to help us ensure our processing of your personal information for this is lawful. You can ask us for a copy of the full assessment. Our contact details are in Section 11 below.

Legitimate Interest Assessment – 3rd party information

We have a specific purpose with a defined benefit.	Yes, to share information about a service which could be very helpful to a large number of our members, residents, tenants or customers.
The processing is necessary to achieve the defined benefit.	It benefits the Pensions Board, its members, residents, tenants and customers and the third-party organisations to publicise relevant and carefully selected services.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	We will not manage or process requests to use or “opt-in” to any third-party service. Instead we will direct members to this service. Individuals have the right to object to receiving such communications again in the future. After we provide the initial information, we will direct members, tenants, residents or other customers who enquire about these additional services to our website (or the third-party website), for more information.

For **special category** data:

- **Explicit consent:** to share with and receive information from Occupational Health specialists about meeting your housing needs and on your health and personal circumstances (including any titles you may hold due to you work with the Church) to support you in accessing any benefits or other charitable support you may be entitled to. We will also seek your consent to install and remotely monitor the performance of additional fire detection devices in your home, where the installation of such a device (e.g. strobe lighting), might indicate something about your health.
You can withdraw your consent at any time by contacting us using the details provided in Section 11 below. Please be aware that by doing so you may prevent us from delivering some services to you, where these rely on your consent e.g. welfare advice
- **Legal Claims:** where we need to bring or defend legal claims or in connection with a judicial process.
- **Substantial public interest,** including, where we need to meet safeguarding obligations¹ or process information related to an insurance claim²

¹ Under the Data Protection Act, Schedule 1 part 2, paragraphs 11, 18.

² Under the Data Protection Act, Schedule 1 part 2, paragraph 20.

- **Legitimate Activity:** to process information about any title you may hold due to work within the Church in ensuring the delivery of safe, quality retirement housing.
- **Vital Interest:** where it is necessary for us to process your data in emergency circumstances and you may not be able to give consent.

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

We collect your personal information from a number of sources, including:

- You and your spouse/partner
- The Pensions team, to assess your eligibility for housing support; to make sure we can contact you about any services which might be of benefit to you (including retirement housing and welfare advice services)
- Occupational Therapists or other medical practitioners to assess the need for aids and adaptations (but only with your consent)
- Other Church and statutory bodies, with your consent, where this supports your application or tenancy.

Normally, only the Board's staff or the staff of other bodies of the NCIs such as Accounts staff, can see and process your personal data.

There may be times when we will share relevant information with the third parties listed below. We do this for the purposes outlined above or where we are legally required to do so. Where necessary or required, we may share information as follows:

- With our contractors and suppliers to undertake repairs, maintenance or improvement works
- With third party service providers, about services performed on our behalf such as solicitors and including Aareon who supply our Housing Management System. Our relationships with such providers are governed by our contracts with them which include strict data sharing and confidentiality agreements.
- With insurers in relation to any specific claims that may affect our insurance policies
- With community partners, about the delivery of coordinated local services.
- With utility companies and their representatives, about 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, and to manage safeguarding risk
- With local authorities, courts 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 emergency services, to protect the vital interests of an individual (in a life or death situation)
- With other statutory organisations, e.g. social services and health authorities, as necessary for exercising statutory functions and to support safeguarding.
- With individuals who hold a legal Power of Attorney for you or who you have explicitly authorised to speak to the Board on your behalf.

Once your information has been collected by an organisation that constitutes 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 Pensions Board will not transfer your personal information outside the UK without your consent and necessary safeguards.

7. How long we retain your information

There is 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.

9. Profiling and automatic decision making

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 withdraw your consent
- 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 Pensions Board team handle your personal data, please contact housingservices@churchofengland.org or 020 7898 1824.

If you have a complaint about how the Pensions Board handles your personal data, please contact the Data Protection Team at: gdpr@churchofengland.org or online at: www.churchofengland.org/national-church-institutions-data-protection or by phone to 020 7898 1114.

You have the right to make a complaint at any time to the Information Commissioner, online at <https://ico.org.uk/concerns/> or phone: 0303 123 1113.