

Client and Customer Privacy Notice

IMPAKT Housing & Support Client and Customer Privacy Notice

IMPAKT Housing & Support (“we,” “us,” “our,” or the “Organisation”) is committed to protecting the privacy of individuals who use our services (“Clients”) or buy our goods (“Customers”)

This Privacy Notice describes the Organisation’s information and privacy practices including how it collects, uses, shares and secures the personal information of Clients and Customers. It also advises of the rights and choices offered regarding use, access and amendment of personal data.

IMPAKT Housing & Support as Data Controller

IMPAKT Housing & Support is listed as the Data Controller for personal data collected in connection with IMPAKT Housing & Support services. IMPAKT Housing & Support is joint Data Controller with Grand Union Housing Association for Personal Data collected in connection with Refugee services. IMPAKT Housing & Support will only process your personal data in accordance with applicable data protection and privacy laws.

We are listed on the Information Commissioner’s Office (“ICO”) register of data controllers with registration number Z2740631.

Our Contact Details

Contact information

For the purpose of applicable data protection legislation, the Data Controller of your personal data is IMPAKT Housing & Support located in Bedfordshire, UK.

IMPAKT Housing & Support
43 Bromham Road
Bedford
MK40 2AA
01234 307040
www.impakt.org.uk
hello@impakt.org.uk

The main point of contact for data protection matters including questions regarding this Privacy Notice should be directed to the IMPAKT Housing & Support privacy team by emailing us at

Privacy@impakt.org.uk

or by writing to us at:

IMPAKT Housing & Support
Data Privacy Team
43 Bromham Road
Bedford
MK40 2AA

The type of personal information we collect and how we collect it

We currently collect and process the following information:

Directly from you

IMPAKT Housing and IMPAKT Domestic Abuse - Personal identification (inc. photograph); dependent(s) information-if applicable; historical data (employment, criminal, address); equality and diversity data (ethnicity, sexual orientation, gender identity); health information, support and wellbeing needs.

IMPAKT Young People - Children: Personal identification (inc. photograph); historical data (education, criminal, family history); diversity data (ethnicity, gender); support & medical needs. Parents: Personal identification data (inc. family status), historical data (employment, criminal, health).

IMPAKT Preloved Personal details (name, address, phone number)

IMPAKT Food Postcode; Personal details for deliveries only (name, address, phone number)

IMPAKT Interiors Personal details (name, address, phone number, email address)

Indirectly from the following Sources

IMPAKT Housing and IMPAKT Domestic Abuse - Police National Computer (PNC) checks, people providing required references, housing benefit / council tax support payment information, information and feedback from education providers /social worker/other professionals, information from other residents (e.g. reporting an incident, conversation etc.), CCTV (video footage)

IMPAKT Young People - Tutors' behavioural notes, school feedback, other professional feedback (social worker etc.), information from other Fun4YP young people (e.g. reporting an incident, conversation etc.)

IMPAKT Preloved and IMPAKT Food - Local Authority and other fund providers for provisions of referral items and food parcels.

The lawful bases for processing this information

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

Your Consent – we will use this where we can offer you a choice as to whether or not we collect, store, share or otherwise process your information. This will be made clear to you, and will not be done unless we have your consent. If you later want to withdraw your consent, contact IMPAKT Housing & Support at Privacy@impakt.org.uk

Consent of Children - If the personal information collected relates to somebody under the age of 16, this privacy notice is aimed at their parent or guardian with parental responsibility, who is expected to make a decision regarding consent on their behalf.

We have a contractual obligation – in some cases we need to collect information in order to fulfil a contract

We have a legal obligation in some cases we need to collect information in to fulfil our legal obligation

We need it to perform a public task – where we are working to assist with public law we will collect your information under public interest. We will be clear about why we have to collect this information, how it will be used, who you can expect it to be shared with and why.

We have a legitimate interest – we may collect, or otherwise process information about you which we believe will assist you when you are with us or using our services.

It is necessary for the protection of vital interests – we may collect or share personal information where it is necessary to protect an interest which is essential for the life of the data subject or that of another natural person.

If you have any objections to these types of processing, you can contact the Data Protection Officer using the details below.

What we do with the information

How we use your personal information

General We use the information in order to generate anonymised statistical data which is used to report to funders and other stakeholders.

IMPAKT Housing, IMPAKT Skills and IMPAKT Domestic Abuse We use the information in order to process your application, assess risks, assess how best to support you, help you make applications to other services, funds and certain benefits, set up your Licence agreement (if applicable), make a record of support given during contact and key work.

IMPAKT Young People We use the information in order to have a record of activities accessed, support given, and feedback collected.

IMPAKT Preloved We use the information in order to process collections, sales – including those via third party funding - and deliveries of goods, to record and process gift aid, to maintain a 'wish list'.

IMPAKT Food We use the information in order to fairly distribute goods and deliver when applicable.

IMPAKT Interiors We use the information in order to process sales – including details of commissioned items, deliver goods and to maintain a 'wish list'.

Sharing your personal information

We may need to share some of your information, and we will always take appropriate precautions before doing so. If there are parties we share with regularly, their details will also be provided in this Privacy Notice, along with a reason for doing so. Where we do not **need** to share information, we will always ask for your consent. We do this to respect your right to have a control over your data, and where it is going.

Service Providers

IMPAKT Housing & Support may share Data about our Clients with the Organisation's contracted service providers so that these service providers can provide services on our behalf. These service providers are authorised to use your personal information only as necessary to provide the requested services to us. Unless described in this Privacy Notice, IMPAKT Housing & Support does not share, sell, rent, or trade any information with third parties for their promotional purposes.

Third Parties

IMPAKT Housing & Support Partners:

- *Centum: Basic client information for overnight project security*
- *Grand Union Housing Association: Anonymous statistics on project use & client profiles*
- *Central Bedfordshire Council: Anonymous statistics*
- *Bedford Borough Council: Anonymous statistics*
- *Luton Borough Council: Anonymous statistics*
- *Big Lottery: Anonymous statistics*
- *Children in Need: Anonymous statistics*
- *Wixamtree: Anonymous statistics*
- *Panacea Society: Anonymous statistics*
- *Bedford Rotary Club: Anonymous statistics*
- *BPHA: Anonymous statistics*
- *Harpur Trust: Anonymous statistics*
- *PNE: Anonymous statistics*
- *BLCF: Anonymous statistics*
- *WRAP: Anonymous statistics*
- *Sport England*
- *Postcode Lottery*

Compelled Disclosure

IMPAKT Housing & Support reserves the right to use or disclose information provided if required by law or if the Organisation reasonably believes that use or disclosure is necessary to protect the Organisation's rights and/or to comply with a judicial proceeding, court order, or legal process. In addition to the above, the following are bodies we might expect to require information from IMPAKT Housing & Support are:

- Police
- Social Services
- Early Help
- Integrated Front Door
- DWP
- HMRC
- IMPAKT Housing & Support Insurers

International transfer of information collected

For IMPAKT Housing & Support Client Data:

There is currently no third party supplier data transfer outside of the UK.

How we store your information

General:

Your information is stored on our secure servers in Drives and folders accessible only to the relevant staff.

IMPAKT Housing, IMPAKT Domestic Abuse, IMPAKT Young People:

Client data is stored on our secure external CRM System hosted by Homeless Link.

Data Retention

General:

- Anonymised statistical data: for as long as that data is useful to the organisation.
- Marketing materials: (such as case studies, photographs etc) for as long as you have allowed us consent, or until you withdraw that consent

IMPAKT Housing, IMPAKT Domestic Abuse, IMPAKT Young People:

We will only retain your personal data for the period you are accessing our service(s) plus whichever is the longer of:

- We will keep your data for a period in-line with the National Housing Federation guidelines, which you can find here. This usually means a retention period of 6 years after you leave our service unless you were under 18 years of age when you accessed our service, in which case the Children's Act 1989 will apply and we will retain some data until your 26th birthday.
- Data records containing Team Teach incident reports, must be kept until the clients 85th birthday (applicable to IMPAKT Young People service)

We will only retain the data which is relevant to the reason which we are citing for retaining as above.

Your data protection rights

Rights and Choices regarding your Personal Data

Access (Right to be informed, Right of Access)

You may access the data we hold about you at any time by contacting us directly at Privacy@impakt.org.uk

Amend (Right to Rectification)

You can contact us to update or correct any inaccuracies in your personal data

Move (Right to Data Portability)

In certain situations, your data is portable. Where the right applies, you are entitled, on request, to receive your data in a structured commonly used and machine-readable format and to have the data transferred to other Organisations.

Erase and forget (Right to Erasure)

In certain situations, for example when the data we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

Object to processing (Right to Object)

You have the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Privacy@impakt.org.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Privacy@impakt.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Changes to this privacy notice

IMPAKT Housing & Support may update this Privacy Notice from time to time. The most current version of this notice will be available to view on our website www.impakt.org.uk If we make any material changes, we will notify you, if possible, by providing a copy (paper or email) of the revised Privacy Notice. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Any additional provision of personal data during your continued use of the IMPAKT Housing & Support Service(s) will be subject to the terms of the then-current Privacy Notice.