



Giving people
room to create
a better future.

Privacy policy

April 2024

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CRAWLEY FRIENDS HOUSING ASSOCIATION LTD.

PRIVACY POLICY

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1. Personal Information

1.1 The privacy and security of personal information is extremely important to us.

1.2 Contact with us generates records, including records of some personal information which is subject to data protection legislation.

1.3 This privacy notice explains how and why we use personal data, to make sure those who contact us can be confident about giving us their information. We will never sell personal data and will only share it with organisations we work with when it's appropriate and the privacy and security of personal data is assured.

2. Overview

2.1 This notice applies if you're a resident, volunteer, contractor, or use any of our services, visit our website, email, call or write to us, or visit us in person.

2.2 The type of information we collect depends on our needs. For example, if you contact or visit us, we may only need limited information about you to deal with your query. If you are one of our residents, we may need to collect a variety of information about you to ensure that we can provide you with appropriate accommodation, comply with the terms of your licence with us, or to provide you with or refer you to appropriate support services to assist you. Information may include your contact details, financial information (including the receipt of benefits), or mental or physical health information (including whether you have any disabilities we should be aware of). We may also need to collect certain information to meet our statutory obligations.

2.3 We ensure that the information we hold about you is only used for the purposes it was obtained for, and only kept for as long as is necessary to provide you with services, deal with your licence, or to comply with our other statutory or regulatory obligations. We may need to share some information with third parties, such as local authorities, benefits departments, our repairs and maintenance contractors, social services, other social landlords and government departments as required, and the emergency services.

2.4 You also have various rights in relation to your personal data, including the right to see copies of the personal data we hold about you, or to make a complaint to the regulator, the Information Commissioner's Office (ICO).

2.5 This is only a simple overview of how we use your personal data. The rest of this notice is split into sections to make it easier to understand. If you have any queries about this notice, please contact us using the Contacting Us section below.

3. Who are We?

3.1 In this notice, whenever you see the words 'we', 'us', 'our', 'Camfield' or 'CFHA', it refers to Crawley Friends Housing Association Limited. Our ICO registration number is RI8128.

4 Contacting us

4.1 If you have any questions in relation to this document or how we use personal data they should be sent to: committee@crawleyfriendsha.org.uk or

The Chair of Trustees

Crawley Friends Housing Association, Camfield, Langley Lane, Ifield, Crawley, West Sussex RH11 0NB

5 Who the personal information relates to

5.1 We collect and hold personal information about:

- **Residents.** This includes current, former and potential residents who live in our accommodation or access our support and other services and may include members of their family and people associated with them.
- **Trustees and volunteers.** This includes Trustees and other volunteers who assist our staff in the governance and administration of the organisation.
- **Visitors** - Visitors to our website and our offices, those who email, call, message us or write to us, including anyone who makes a complaint or enquiry to CFHA.

6 How we collect personal information

6.1 We collect information in a variety of ways.

6.2 You can give us personal data by filling in forms provided by us, for example on signing our licence agreement, by registering on our website or by corresponding with us (by phone, email, etc.).

6.3 We also collect information through our ongoing contact and correspondence with you, and with other support agencies which relate to you, and from people associated with you such as family, friends and neighbours.

6.4 Calls to our office might be recorded.

6.5 We also have Closed Circuit Television (CCTV) surveillance cameras to record events in public areas.

6.6 If you provide us with personal information relating to members of your family or your associates, we will assume that you do so with their knowledge and consent.

7 What information we hold (residents)

7.1 When you apply to become a Camfield resident, we obtain information to determine your needs. You will provide us with information through your application form. We will also use information from third parties where appropriate to help us to assess your application.

7.2 We will generally require the following information from residents:

- Full name including proof of identity / photo ID.
- Date of birth.
- National Insurance number.
- Contact details, including telephone, email or contact address.
- Details of anyone authorised to act on your behalf if applicable.
- Details of next of kin.
- Banking or payment card details if you make payments to us.
- Benefit information.

7.3 We may also need additional information from you concerning:

- Disabilities or vulnerabilities – We use this information to tailor our service to better meet your needs. We may also use this information for safeguarding of staff.
- Financial information – It is important that arrears payments are settled promptly, therefore we may collect information to help us to work out a plan with you. In addition, to provide welfare, benefits and debt advice as a free service to help you budget, pay your bills, or to apply for funding on your behalf.

8. What information we hold (visitors)

8.1 For visitors to the website, in order for our website to work correctly, we automatically collect the information set out below.

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet.
- Information about your visit

8.2 Visitors to Camfield are required to sign the visitors' book. These records are kept.

9. CCTV and photographs

9.1 CCTV is used to provide security and to protect both our visitors and residents. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is stored for a set period of time after which it is recorded over. CFHA complies with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

9.2 We may take photographs at our events to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your prior consent.

10. How we use your information

10.1 Your personal data will be collected and used to help us deliver services or to complete a task raised at your request. What we do with your information will depend on how you interact with our various services.

10.2 We use your personal information to allow us to enter into, or manage any contract we have with you, including:

- Processing applications for accommodation.
- Managing licence agreements, including collecting rent and service charges.
- Ensuring compliance with the conditions of any agreement between us
- Provide care and support for vulnerable customers.

10.3 We use your personal information to allow us to provide you with services and benefits in both our legitimate interests, including ensuring the proper management of your licence and giving you appropriate support:

- Offering help with debts and benefits advice.
- Assisting you in the management of account charges, payments and arrears.
- Providing support services to help residents achieve their goals
- Keeping in touch with residents to understand your needs and preferences.

10.4 We use your personal information to allow us to comply with our legal and regulatory obligations, and acting in the public interest, such as:

- Preventing and detecting crime and resolving disputes.
- Preventing and detecting fraud and money laundering.
- Promoting safety and the quiet enjoyment of our neighbourhoods and residents.
- Promoting equal opportunities and fair treatment for all our residents.
- Meeting any obligations we owe to our funders and regulators.

10.5 Under the data protection legislation certain personal information is classified as “sensitive” or “special category” personal data. This includes information relating to racial or ethnic origin, physical or mental health, sex life or sexual orientation, religious or philosophical beliefs, political opinions, membership of a Trade Union, allegations of criminal offences and criminal convictions and offences, along with biometric data such as fingerprints.

10.6 We minimise our holding and use of sensitive categories of personal information but, given the services we provide, there are times when we use it to understand our residents and their needs better. We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we offer, to provide you with social care, or to deal with any legal action. There may be times where we need to ask you for your consent to use this type of personal information, in which case we will always notify you and make this clear.

11. Children’s personal data

11.1 We do not usually process data on children aged under 18 as Camfield does not accommodate people in this category.

12. Sharing your information

12.1 Your personal information will be kept secure and confidential. Our staff, trustees and other volunteers have restricted access to personal information on a “need to know” basis.

12.2 We may share information with third parties, including contractors we work with such as our repairs and maintenance contractors and IT infrastructure providers, agencies and authorities we work with, such as Local Authorities, Social Services and the Police.

12.3 We will share certain information in appropriate circumstances with our regulators or funders. We will also share relevant information with others when CFHA believes it is in your, or the public’s, interest to do so, such as to keep residents, staff or visitors safe, or as required by law.

12.4 In particular, please be aware:

- If you default on any licence conditions, **whether financial or behavioural**, information about you may be provided to authorised **agencies, e.g.** debt recovery agencies, to enable them to recover the debt. This may affect future applications for accommodation, credit and insurance
- We may discuss your financial situation, rent payments (including any arrears) and any claims made for welfare benefits with an external debt advice agency, welfare rights advisor, the housing benefit department or the local authorities’ housing advice and homeless prevention team to make sure that benefits are paid correctly.

- We may pass data about your rent payment record to credit reference agencies. This will enable them to assist other organisations to assess your financial standing if you apply for products and services.

12.5 When we allow third parties acting on behalf of CFHA to access your information, we will always have complete control of what they see, how long they see it for and what they are allowed to do with it. We do not sell or share your personal information for other organisations to use.

13. How we secure your data

13.1 Information system and data security is imperative to us to ensure that we are keeping your data safe. We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever-changing threat landscape.

13.2 Personal information is stored and managed within a variety of IT software systems which are maintained to achieve a high level of security and confidentiality. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

13.3 Our employees complete mandatory information security and data protection training at the start of their employment, and annually thereafter to reinforce responsibilities and requirements set out in our information security policies. Only those staff members and third parties who require access to your information will be able to access it.

13.4 When you trust us with your data, we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit, we minimise the risk of unauthorised access or disclosure.

13.5 CFHA are based in the UK and we store most of our data within the European Union (EU). In the event that some organisations which provide services to us intend to transfer data outside the European Economic Area, we will only allow this if your data is adequately protected.

14. How long do we keep your information?

14.1 We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

14.2 We will usually keep:

- Any application for accommodation for 6 years following acceptance of the offer of accommodation.
- Housing benefit notifications and rent statements for 2 years.
- Information on your licence file for 6 years following the end of your licence with us.
- Care plans and related documents permanently, or until transferred to a subsequent accommodation provider.

15. Your rights

15.1 You have various rights in your personal data including the right in certain circumstances:

- To ask us for access to information about you that we hold.

- To have your personal data rectified, if it is inaccurate or incomplete.
- To request the deletion or removal of personal data unless there is a compelling reason for its continued processing, for example if we are required to retain it for statutory purposes, or to protect our legal interests.
- To restrict our use of your personal data (i.e. permitting its storage but nothing further), although in some cases we will not be able to restrict our uses of your information, for example if we are required to process it for statutory purposes or to protect our interests.
- To object to certain ways in which we use your information.
- Not to be subject to decisions made automatically through the use of technology and with no human consideration where it produces a legal or similarly significant effect on you
- To request that we transfer your information directly to a new landlord or other third party.

15.2 Further information about your data protection rights appears on the Information Commissioner's website.

[A guide to individual rights | ICO](#)

16. Consent

16.1 We may sometimes process your data for specific purposes which require your consent. If we do this, we will always ask for your written consent. Where we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. This may affect the services that we can make available to you but, if so, this will be explained in the consent form. Please contact us if this is the case.

17. Complaints or concerns

17.1 If you are unhappy with our use of your personal data, or anything in this notice, please talk to us directly so we can help to resolve any problem or query.

17.2 You also have the right to raise any concerns with the Information Commissioner's Office (ICO). They can be contacted by post:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

By calling 0303 123 1113 or by email casework@ico.org.uk

Their website is www.ico.org.uk

18. Related documents

18.1 Other CFHA policies that may be used to help ensure the effectiveness of the Privacy Policy include:

- Data Protection Policy
- Records Retention Policy
- Safeguarding Policy

- Equality, Diversity and Inclusivity Policy

19. Legislation and Regulations

19.1 The legislation listed in this policy is not intended to cover all legislation applicable to this policy. CFHA will take reasonable measures to ensure compliance with any and all applicable legislation by reviewing policies and procedures and amending them as appropriate. The legislation listed within this policy was considered at the time of the development of this policy, but subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered and the policy reviewed and adopted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy.

19.2 The following is a list of key legislation relating to Privacy:

- Data Protection Act 2018
- Care Act 2014

20. Review

20.1 This policy will be reviewed every year or sooner if there is:

- A significant incident relating to this policy
- An organisational change related to this policy
- A change in legislation