

Privacy Notice

All personal information about you will be under the control of Quo Vadis Trust (QVT) acting as Data Controller and will be processed in line with applicable UK data protection legislation including, but not limited to, the UK General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (the DPA).

QVT is registered with the Information Commissioner's Office (ICO) and our registration number is Z3068939.

This privacy notice sets out, in line with current data protection obligations, the types of data that we hold about you as a client of the Organisation. It also sets out how we use that information, how long we keep it for and other relevant information about your data. The Organisation is committed to processing your data securely and transparently.

This document tells you about the sort of personal information we collect and how we will use it.

Who does the privacy notice apply to?

This notice applies to current and former clients, and those applying for a place in our schemes.

Data controller details

The Organisation is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: Quo Vadis Trust, 92 Brownhill Road, London SE6 2EW.

Our Data protection officer is John Aligbe, our Head of Strategy Implementation and Quality Assurance (j.aligbe@qvt.org.uk).

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way.
- collect your data only for reasons relating to your application for a place at the Organisations Schemes
- Only use it in the way that we have told you about.
- ensure it is correct and up to date.
- Keep your data for only as long as we need it.
- Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.
- Ensure we are accountable for our processing of all personal data.

Types of data we process

Personal information is information about someone which allows that person to be identified. Examples of personal information that we may hold about you includes:

- Your personal details including your name, address, date of birth, email address, phone numbers, next of kin and emergency contact details.
- Your photograph
- Gender
- Marital (or relationship) details
- Information included your past and current address history, incidents, and hospital admissions
- Documentation relating to your right to reside in the UK
- Bank details
- Tax identification numbers
- National Insurance number
- Benefits and Council tax information.
- Images of you on our CCTV systems
- Proof of housing eligibility
- References
- Details of anyone authorised to act on your behalf, if applicable.
- Personal details of all household

How we collect your data

We collect data about you in a variety of ways and this will usually start when you are referred to our service.

Information collected may be shared by your referral agency and then we will continue to collect them directly from you or from other professionals involved in your care, for example:

- Someone acting on your behalf
- Any other organisations relevant to your application and ongoing service such as local authorities or previous landlords
- Social Services, healthcare professionals for the purpose of health and wellbeing support
- The Care Quality Commission
- Emergency Services
- The Police
- The Probation Service
- Support workers
- Social workers
- Credit reference agencies
- CCTV images taken using our own CCTV systems

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, faxes, online application forms, questionnaires, and text messages.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- To provide a safe and appropriate service to you
- To respond to your enquiry or application for housing or care
- To make sure that everyone who completes a housing application is treated fairly and equally and that our policies and procedures comply with legislation
- To confirm your right to rent in the United Kingdom
- To assess your needs and suitability for the services we provide now and, in the future, - this is necessary for the performance of, or to take steps at your request prior to entering, a contract with you
- To administer client records
- To maintain our own accounts and records
- To help us respond to your wellbeing and social care needs
- To keep you up to date about our services and notify you of any opportunities
- Monitor and meet your housing, care, and support requirements - this is necessary for the performance of our contract with you
- To manage risks

What information do we ask for and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary. The information we ask for is used to assess your suitability for housing and care. You do not have to provide what we ask for, but it may affect your application, if you do not. We will use any feedback you provide about our referral and assessment process to develop and improve our future referral and assessment programs.

Details of what information we collect, and store can be found in Appendix A for Housing Residents data (page 8) and Appendix B for Care Home Residents data (page 9).

The purpose and lawful basis for processing your information

All the processing conducted by us falls into one of the lawful reasons. We will rely on the first three reasons set out above to process your data.

- Legitimate interest Article 6(1)(f) - we may collect other information about you which we believe will assist you when you are with us. This will be used to ensure you are receiving tailored and specific support around your needs
- Consent (Article 6(1)(a)) - 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.
- (Substantial) Public interest Article 6(1)(d) - where we are working to assist with public law we will collect your information under public interest. We will be clear about why we must collect this information, how it will be used, who you can expect it to be shared with and why
- Contract (Article 6(1)(b)) - in certain cases we need to collect information to fulfil a contract, this will be when you have a tenancy or licence agreement with us.

- Legal Obligation Article 6(1)(c) - Sometimes we may need to store and share information where QVT has a legal obligation to do so; for example, we may need to store information to comply with health and safety legislation

Special categories of data

Special categories of data are data relating to your:

- Health
- Sexuality
- Race
- Ethnic origin
- Political opinion
- Religion
- Beliefs
- Physical or mental health condition
- Alleged or real offences
- Proceedings for any alleged or real offence
- Genetic and biometric data

We must process special categories of data in accordance with more stringent guidelines. The additional bases for processing special category data that we rely on are:

- Article 9(2)(a) which relies on your explicit consent
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent
- Article 9(2)(f) for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity

Most commonly, we will process special categories of data when the following applies:

- You have given explicit consent to the processing
- We must process the data to conduct our legal obligations
- We must process data for reasons of substantial public interest
- You have already made the data public
- Legitimate interest. In certain circumstances we may process data to achieve our charitable purposes. This Where we may use our legitimate interest to process sensitive data (special categories) will be where consent or any other lawful basis is not a viable choice. Where this is the case, we will ensure the provisions of the UK GDPR, and the Data Protection Act 2018 are in force. This may include the use of an appropriate policy document

We will use your special category data:

- for the purposes of equal opportunities monitoring
- to conduct our legal obligations (e.g. sharing info with police in case of missing person or incidents)
- to determine reasonable adjustments and make sure that the service we provide to you meets your needs.

We do not need your consent if we use special categories of personal data to conduct our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Proceedings for any alleged or real offence

We will only collect criminal conviction data where it is appropriate and where the law permits us. This data could be collected at the referral stage or may also be collected during your stay at QVT. We use criminal conviction data in the following ways:

- To ensure that we provide you with the right care and support
- To manage risks

We process this data because of our legal obligation to ensure the safety of our staff and clients. We may rely upon an appropriate policy document for the processing of criminal records.

Sharing your data

Your data will be shared with colleagues within the Organisation where it is necessary for them to undertake their duties. This includes, for example, your key worker, your House Manager, the Benefit department for maintaining clients' records and dealing with Housing Benefits, and other external professional and or family members who are involved in your care.

We may also share your data with third parties, such as police and ambulance, to provide you with care and support or to comply with a legal obligation or our legitimate interest. We share data with other supported accommodation and with the council for referral purposes (for example, if we cannot provide you with the adequate support, we will share the information about you with another provider).

Where we do not need to share information, we will always ask for your consent. We do this to respect your right to control your data and its destination.

We do not share your data with bodies outside of the UK or European Economic Area (EEA). We will only allow organisations that provide services to us to store your data outside of the UK or EEA if your data is protected to ensure the security of your personal data. This includes the use of a UK transfer safeguard. We may also undertake a transfer risk assessment.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction, and abuse. We have implemented processes to guard against such. At a minimum, we will password protect any documents being transferred which contain your personal data.

Where we share your data with third parties, we will provide written instructions to them to ensure that your data are held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

QVT operates a robust process for assessing, managing, and protecting new and existing systems. Your data is protected by multiple layers of security. Our employees complete mandatory IT security and data protection training every year. Your information is available to our employees and third parties on a strictly need to know basis.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as necessary, after which it will be securely disposed of.

We usually keep:

- Any application for accommodation for 7 years following acceptance of the offer of accommodation
- Housing benefit notifications and rent statements for 2 years
- Complaints for 6 years after resolution
- Information on your tenancy file for 7 years following the end of your tenancy with us
- Care plans and related documents for 8 years on cessation of our contract with you, or until transferred to a subsequent provider
- Recordings of telephone calls for 1 year
- CCTV images for 28 days

Automated decision making

No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold about you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold about you. To do so, you should make a subject access request. You can read more about this in our subject access request policy which is available from HR
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you can require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it

- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold about you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in certain cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact the DPO by sending an email to: GDPR@qvt.org.uk.

Making a complaint

If you wish to make a complaint about how your personal data is being processed by QVT or any of our third parties, or how your complaint has been handled, please contact QVT's Data Protection Officer on the details provided below.

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on 0303 123 1113 or through the website <https://ico.org.uk/make-a-complaint/>

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- **Writing to the Data Protection Officer** at Quo Vadis Trust, 92 Brownhill Road, London SE6 2EW
- **Email us** at GDPR@qvt.org.uk
- **Using the 'Contact us'** section on our website
- **Telephoning** the Data Protection Team on 020 8778 4546

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.

This privacy notice may change from time to time. Please check our website on a regular basis to read our latest version at <https://qvt.org.uk/>

"We," "us," "our," "the Organisation," or "QVT" means Quo Vadis Trust.

Appendix A - Housing Resident Data

What data we collect	What we do with it
Your name, address, and contact details, including email address and telephone number.	- To process your referral - To process your application - To correspond with you - To carry out welfare calls - To seek your feedback and opinions about QVT
The name, address, and contact details, including email address and telephone number of anyone authorised to act on your behalf.	- To process your enquiry - To carry out maintenance and repairs - To process your application
Next of Kin and Emergency Contacts	To allow us to speak to your preferred contacts on your behalf or in an emergency
Marital (or relationship) details	Equal opportunities monitoring to ensure we are fair
Passport, national insurance details, images, and other evidence of identity	Confirmation of your identity
Income	To support you with in applying for Housing Benefits
Work status	Provided to TV licencing for eligible residents for concessionary TV Licence
Date of birth	- To ensure eligibility for one of our properties - Provided to TV licencing for eligible residents for concessionary TV Licence
Information about your nationality and entitlement to live in the UK	To check your right to live in the UK and enter a contract with you
Photograph	We may capture your photograph to share news of local events for social media platforms and marketing. We will do this with your consent
References	To confirm your suitability for one of our properties
Health information	- To help us support your wellbeing - To assist you in an emergency
Banking details	For payment of rent and service charges through your bank account or GoCardless service

What data we collect	What we do with it
Financial details	- To support the management of arrears - To offer free, confidential, practical help to all housing residents through keywork sessions - This is shared with the team with your consent
Information about a criminal record	To confirm your suitability for one of our properties
Benefit and council tax information	To support your rent payment
Website forms	To support you with your enquiries
Accidents and incidents	To support you in the event of any accidents and incidents
Equality and diversity monitoring information, including your ethnic origin and date of birth	Equal opportunities monitoring to ensure we are fair
Voice recordings of phone calls	Calls are recorded by Customer Services for training & monitoring purposes to improve our service and for the purpose of complaint resolution
CCTV images	Your image may be captured on an QVT CCTV system. CCTVs are installed for the purpose of crime prevention and safety

Appendix B - Care Home Residents Data

What data we collect	What we do with it
Your name, address, and contact details, including email address and telephone number.	- To process your referral - To process your enquiry - To process your application - To correspond with you
The name, address, and contact details, including email address and telephone number of anyone authorised to act on your behalf.	- To process your enquiry - To process your application - To support your needs as a resident
Date of birth	- To ensure eligibility for one of our properties - Provided to TV licencing for eligible residents for concessionary TV Licence



quo vadis trust



What data we collect	What we do with it
Next of Kin and Emergency Contacts	To allow us to speak to your preferred contacts on your behalf or in an emergency
Marital (or relationship) details	Equal opportunities monitoring to ensure we are fair
Passport, national insurance details, images, and other evidence of identity	Confirmation of your identity
Information about your nationality and entitlement to live in the UK	To check your right to live in the UK and enter a contract with you
Photograph	To ensure your care planning and medication are linked specifically to you
References	To confirm your suitability for one of our properties
Health, mobility and medication information	• Care planning to support your wellbeing • To assist you in an emergency
Website forms	To support you with your enquiries
Banking details	For payment of rent and service charges through your bank account or GoCardless service
Information about a criminal record (where required)	To confirm your suitability for one of our properties
Accidents and incidents	To support you in the event of any accidents and incidents
Equality and diversity monitoring information, including your ethnic origin and date of birth	Equal opportunities monitoring to ensure we are fair
Voice recordings of phone calls	Calls are recorded by Customer Services for training & monitoring purposes to improve our service and for the purpose of complaint resolution
CCTV images	Your image may be captured on an QVT CCTV system. CCTVs are installed for the purpose of crime prevention and safety