

Privacy Notice

Impact Housing Association is a charitable housing association based in Cumbria and North Lancashire. As well as providing social housing Impact also delivers a number of non-housing services. These include, Impact Furniture Services, a furniture recycling and reuse project; The Oval, a community centre on the Salterbeck Estate in Workington; resource centres at Eden Rural Foyer and South Lakes Foyers. Impact provides some community services including job clubs, IT skills, room hire and a community gym. We also deliver services on behalf of others; these include the Building Better Opportunities project, At Home in Eden and UK Online. This privacy notice explains why Impact Housing needs to process your information so that you can benefit from these, non-housing services. Although Impact are the 'data controllers' the information is still yours. You have rights and we have responsibilities.

Your basic right is that we must process your information lawfully, fairly and transparently. This privacy notice, which follows guidance given by the Information Commissioner's Office at [Privacy Notices](#), is part of being transparent – being open and clear so you can check that we are being lawful and fair.

In the spirit of transparency we will avoid jargon, but please note that 'personal information' is information about you from which you can be identified, whether directly or indirectly; and that 'processing' personal information, includes obtaining, recording, using, sharing, holding and deleting it.

This notice tells you

- what information we are processing and why
- in particular, what we might share, who with, and why
- the lawful basis for processing in each case
- how long we will retain your information
- how we will keep it safe, and
- what your rights are

We will process your information when you are;

- Requiring delivery or collection of furniture
- Making a gift aid donation
- Purchasing furniture, including electrical goods
- Hiring meeting rooms
- Accessing Impact's community services

We will process your data it for those purposes. In exceptional circumstances, we will process it in the **public interest** for safeguarding purposes or to combat crime. And we will process it in order to monitor **equality and diversity**.

The lawful basis for processing will be one or more of the following:

- it is necessary for compliance with a legal obligation, *or*
- it is in the legitimate interests of us or someone else, *or*
- you have given your explicit consent (or there are exceptional circumstances)

We will only rely on our legitimate interests if we are confident that they are not outweighed by your rights and interests.

However, if the information is about your health or social care, or something else you can expect to be kept private, we will *always* seek your explicit consent *unless* there are exceptional circumstances. They are when processing, in particular sharing, is

- a proportionate response to a pressing public interest need (see below), *or*
- the law requires or permits it (and it is appropriate to apply the permission), *or*
- a court has ordered it.

When we seek your consent we will tell you precisely what the information is, what we want to do with it, and why. In particular, we will tell you who we might want to share it with and why.

We must ensure your consent is freely given – not the result of undue pressure from us or anyone else – and that you understand your consent can be withdrawn at any time.

Having said that, when a service is dependent on certain information being used or shared and you don't consent to that, the service won't be as good as it could be, or we might not be able to provide it at all.

Impact Furniture Services

We will need you to provide your name, address, and contact details so we can arrange delivery and collection of furniture. If you consent to gift aid we will also need your email address, if you are a UK taxpayer and a record of the item(s) donated and the value. Impact also records details of items purchased, this is so we can understand the types of things people are buying and how often as well as where people come from who purchase goods. For white goods (like fridges and washing machines) we also process details of payment method in case any item is recalled by the manufacture. If you have agreed to Impact claiming gift aid, then Impact is required to share your information with the HMRC and to retain this information for up to 4 years.

Community and Resource Centres

Impact has a community centre at the Oval and the resource centres at Eden and South Lakes Foyer. If you hire a meeting room at one of these venues Impact will need details of the booking and of the person booking the room and payment details. If you don't supply this we will be unable to hire a room to you.

If you attend a job club or IT training at any of these venues Impact will record a record of your attendance, including your name, date of attendance and your employment status. This is because Impact receives some funding to provide these services and we may need to demonstrate to funders records of how many people used these services. If you ask Impact to help with your CV we will store a copy of this, but you can request we delete this at any time.

Building Better Opportunities

Building Better Opportunities is a project part funded by the European Union and matched by the Big Lottery. The Department for Work and Pensions is the data controller for this project and the Big Lottery and Impact Housing are data processors. Impact Housing is a partner within the project. The Groundwork Trust is the lead partner in West Cumbria, the Workers Educational Association in Carlisle and Eden. Impact is required to process your personal information, including your name, contact details, evidence of eligibility for the project and right to work in the UK - such as National Insurance number, copy of your passport or birth certificate as well as details of employment status, qualifications and details of training courses. This information will be shared with the organisations mentioned above and other delivery partners in the project. This information is required for your participation in the project. If you do not provide this information then you cannot be a participant on this project. You may also opt to provide details about hour household, if you are an offender or ex-offender, details of health conditions or disabilities and your sexuality. During your participation in the project Impact will keep details of the sessions you have with us in the form of case notes.

This information will be stored and shared securely and to comply with the requirements of the funding, records will be retained for ten years after the project ends.



At Home in Eden

Impact provides the At Home in Eden service on behalf of Eden District Council to support applicants with completing Disabled Facilities and Decent homes grant applications. Eden District Council are the data controller for this information, any information given by you, either in the grant application or supporting documentation is passed on to Eden District Council. The only information that Impact Housing retains is your name, address, date of birth, dates of any meeting Impact staff member may have had with you and the status of your application.

The Oval Gym

In order for you to have a gym membership at the Oval Impact needs to process the following information – your name, address, date of birth, payment method including bank details if you pay by direct debit. This information is processed as it is required for the contract we have with you for gym membership. We also ask you to consent to providing emergency contact details, consent means that you do not have to provide this information.

Other Projects

From time to time Impact will run other projects that benefit its tenants, residents and communities, such as the tenancy courses run by the Young People's Service. Such projects will collect information, such as the name of people attending the projects, address and any support needs the participant may have. Impact may be required to share some information with other organisations if they have helped to fund the project.

Public interest

In exceptional circumstances we will process, and in particular share, your information in the public interest to protect someone from harm, or combat crime, or for public health purposes.

Combating crime includes preventing and reducing crime, and assisting investigations and prosecutions. It covers all crimes including unlawful violence, public disorder and fraud.

Before acting in the public interest we must consider the facts of each case carefully. We must be able to show the particular use of the information was a proportionate response to a pressing need.

We won't process your information to protect you from harm without your permission, unless the harm amounts to a crime or you lack mental capacity (see above).

Equality and diversity

We support and encourage equality and diversity, we oppose discrimination, and we protect and promote human rights.

In accordance with equality legislation we may ask you for your 'protected characteristics', namely, age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion & belief, sex & sexual orientation.

We ask for those things so we can give everyone an equal opportunity to access our services, but also in order to understand you and your particular needs better.

You needn't answer any questions you would prefer not to.

The lawful basis is equality of opportunity and treatment under Schedule 1 of the Data Protection Act 2018.

We will only share your answers with someone else with your explicit consent, unless there are exceptional circumstances (see above).

You will find further information and advice on the website of the Equality and Human Rights Commission: <https://www.equalityhumanrights.com/en/advice-and-guidance>

Your rights

The links below are to guidance given by the Information Commissioner's Office see www.ico.org.uk

Our processing of your information should be [fair and lawful](#). We should obtain your personal information only for [specified purposes](#) and each purpose should have a [lawful basis](#). We won't use it for a purpose that is incompatible with the original purpose, unless we have your agreement or the law requires it.

The information should be [relevant and adequate](#) and no more than is needed. When we can we will modify it so it doesn't identify you. However, in most cases it will only serve a purpose if it is clear that it is about you. It should be [accurate](#) and up-to-date. We won't [retain](#) it for longer than we need to. We follow national guidance including the National Housing Federation's guidance on document retention. And it must be [safe and secure](#). You also have the right of [access](#) to your

information and for it to be [rectified](#) if incomplete or inaccurate. You have the right to [portability](#) so that your information can be used in different settings. In certain circumstances, you have the right to [object](#) to processing, for processing to be [restricted](#), and even for the information itself to be [erased](#).

Underlying all these rights you have the right to complain or raise concerns. You should contact the Impact's Data Protection Lead Officer, Impact Housing Association, Nook Street, Workington. CA14 4EH
Telephone 03448 736 290
email enquiry@impacthousing.org.uk

You can also complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone number 0303 123 1113 local rate or 01625 545 745 if you prefer to use a national rate number.

We keep this privacy notice under regular review. It was last updated in May 2018.