

Single Homelessness Prevention Service and Sustainable Housing Partnership Service Privacy

The Single Homelessness Prevention Service/ Sustainable Housing Partnership Service (SHPS) is committed to protecting your privacy and being transparent about how we process your personal information. This document describes what data we collect, why we collect it, how we use it, how we keep it secure, and the conditions under which we share it. It also outlines your rights under the General Data Protection Regulation 2016 and the Data Protection Act 2018. In this notice, the term 'we' means SHPS and our Delivery Partners.

Notice

What is SHPS?

Single Homelessness Prevention Service (SHPS), also known in the Norfolk region as the Sustainable Housing Partnership Service (SHPS), is a housing & support service for individuals or childless couples over 18 years old who are either homeless or at risk of becoming homeless, and have a local connection to an area (as defined by Councils that commission our services), or have exceptional reason for needing to move to another local authority, such as fleeing Domestic Violence.

The service will help individuals to find a suitable home in the private rented sector and support any integration activities that will ensure long term tenancy success.

This Privacy Notice also covers the SHPS Refugee Service which is available to refugees in Hackney, Brent and West London.

Who are we?

The SHPS is managed by Pan London Single Homelessness Prevention Service Limited (ICO Registration: ZA538818), on behalf of several Local Authorities, and is delivered in conjunction with the following regional delivery partners:

- Single Homelessness Project (Waltham Forest, Hackney and Enfield)
- Hestia (Ealing)
- Crisis (Brent)
- The Benjamin Foundation (Norfolk)
- Evolve (Norfolk)

For the purposes of the applicable Data Protection Legislation, the Local Authorities we work with are all Data Controllers or Joint Controllers with PLSHPS. For further details please see the table below.

Pan London Single Homelessness Prevention Services (PLSHPS) is part of Bridges Outcomes Partnerships, a social enterprise that works with Government and the social sector to design and deliver outcomes-based contracts.

What information will we collect about you?

The information we collect and hold about you includes:

- Personal details such as your name, address, date of birth, contact details, and identification e.g. driving licence.
- Physical and mental health conditions.
- Information regarding your lifestyle and social/ family circumstances.
- If you provide it, socio-demographic information such as your ethnicity, gender, religion, education, and employment and any convictions.

We will collect information about your participation in activities within the programme. We may also collect data on your feelings and challenges to help us shape the programme and activities to meet your needs. This information is collected directly from yourself and in some cases from other third parties you may engage with whilst on the programme.

What will we do with your information?

We collect and use your information in order to provide you with the best possible support whilst on the programme, as well as to meet the requirements of our contracts and other legal obligations. Key reasons for processing your information include:

- To ensure you are eligible to participate in the programme
- To maintain contact with you
- To allow us to track your participation in the programme and monitor progress - we will review your data at different times during your participation in the programme so that we can see what difference it is making to you.
- To allow us to provide a tailored service that is relevant to you
- The information collected from you in the programme will be used to assess the effectiveness and impact of our programme as a legitimate interest. This is because we want to make sure we are making a difference and helping you, as well as continuing to improve the overall quality of our services.
- We will use the information to track your participation in the programme for research, monitoring and evaluation purposes. Sometimes we will do this by aggregating and anonymising the data, which means that no one can identify you. On occasion we may ask you to take part in a new piece of research and provide additional information or share your information with a third party for the purpose of research, this will only ever be done with your knowledge and consent.

Who will see the information and what information will be collected by them?

We need to share the information with some trusted partners in order that the programme meets your needs. Information may be shared with, and collected by, the following organisations who are involved in the programme, in order that they can deliver their services and to provide monitoring, evaluation, and statistical support. Further information is provided within the table on the next page.

We will not release the data to anyone who is not authorised to receive it, nor for any commercial use. Any data shared for research, monitoring and evaluation purposes will be anonymised.

Sometimes we may need to share your data with other trusted people, we will only do this if it is absolutely necessary. Examples of trusted people we may need to share your data with are health workers, social workers/social services, for registration at local activities groups (sports clubs etc.) or the police. If you tell us something that makes us think you are in danger, we will have to tell the relevant authorities. When we do this, it is because we have to follow the law.

We do not transfer your personal information outside the EEA.

Organisation	Organisations Role	What information is collected and shared?	What is it used for?	Primary Legal basis for processing
PLSHPS (Independent Controller – Islington, Ealing and Waltham Forest. Joint Controllers – Hackney, Enfield and Norfolk. Processor – Brent)	Manage the performance of the programme.	Referral information is provided to us by you or a third party. We share this with our delivery partners. We also share information with the Local Authorities as required.	This information is shared with our delivery partners so that they can contact you. We have access to all participant records so we can help manage the programme.	Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the Controller.
Commissioners: <ul style="list-style-type: none"> • Islington Council, Ealing Council, Waltham Forest Council (Independent Controllers) • Brent Council (Controller) • Hackney Council, Enfield Council, Norfolk Council (Joint Controllers) 	Fund and evaluate the programme.	We share aggregate data provided in reporting and survey results, and programme testimonials. Note: We also provide Thames Reach, who are contracted by Hackney Council, with access to certain files.	Data is shared for financial audit, performance reporting & management and evaluation purposes. Note: Thames Reach are commissioned by Hackney Council to provide the homelessness approach service via the Greenhouse for all residents in need within the London Borough of Hackney.	Art 6(1)(e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Article 6 (1)(a) – Consent to share the initial referral details. Article 6 (1) d) processing is necessary in order to protect the vital interests of the data subject or of another natural person (Safeguard/MASH)
Delivery Partners: <ul style="list-style-type: none"> • Single Homelessness Project (Processor) • Hestia (Processor) • Crisis (Sub-Processor) • The Benjamin Foundation (Processor) • Evolve (Processor) 	Deliver the day-to-day service.	We share referral details with delivery partners. They will then collect additional information from you related to your circumstances and the support you require.	Delivery partners are appointed by PLSHPS to deliver the service and provide one to one support to participants.	Article 6 (1)(a) – Consent to share the initial referral details. Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the Controller.
THCO Ltd (Processor)	Provide the IT system in which your records are captured.	All of the information you provide to us will be stored in the Case Management System and/ or on a council-based system.	Access to your data by their employees will only be to support or maintain the service.	Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the Controller.

Keeping your information safe

We are committed to protecting the security of the personal information which we collect about you. In support of this commitment, we have implemented a range of technical, physical, and organisational controls to ensure an appropriate level of security in place over your data. For example, we make sure that our delivery partners have adequate security in place to protect your data and we put contracts in place with our partners to ensure that the data is used appropriately and where it is transferred outside the UK that it will be looked after. We require all staff to complete mandatory data protection and information security and we limit access to your personal data to those who have a genuine business need to know it.

How long will we keep your personal information?

We will only retain information for as long as contractually and legally necessary. Once we are no longer required to keep your information, it will be securely destroyed, in accordance with destruction guidelines. The following table provides you with summary information on how long we may keep your information:

Type of Information	Length of time
Your participant file	Each contract has slightly different retention requirements, however, generally the Local Authorities require that data is retained for at least 6-years after the end of the contract. In some instances, this data will be retained only by the council, and in other cases it may be retained by PLSHPS. For further information please contact the PLSHPS DPO.
Information relating to fraud or any legal complaints you have made against us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against us or to meet other statutory obligations.
Financial information relating to payments we have made to you whilst on the programme	Six years following the end of the tax year.
Statistical and anonymised data that has come from your personal information.	This data would not be considered personal information and will be kept as long as is necessary to support this and similar programmes across the UK.

Consent

Where we need your agreement to process your information, for example, to pass your contact details to someone offering a specific service, we will ask for your consent, and will clearly state why your information is needed and who we will share your information with. If you agree to your information being shared, we will record your consent on your

record. We will regularly review consent to make sure that the relationships, and purposes for processing, have not changed.

Right to Withdraw Consent

Where you have provided consent for us to share your information with a specific organisation or individual, you have the right to withdraw your consent at any time. Should you wish to withdraw your consent, please tell a member of staff, or, send a written request to the Data Protection Officer who will process your request.

Your rights

The GDPR and Data Protection Act 2018 grants you certain rights regarding your personal information and the way in which it is processed. This gives you more control over what organisations are doing with your information. These include the right to:

- be informed of why and how we process your data.
- request a copy of the information we hold on you.
- have any incorrect information updated and put right.
- deletion of information, once we have no legal right to hold it.
- restrict processing in certain circumstances.
- object to unwarranted processing.
- ask us to transfer your personal information to another organisation.
- object to any automated decision-making including profiling.

For further information about your rights please consult <https://ico.org.uk/for-the-public/>

Contact Us

For more information or if you have any queries, complaints or wish to exercise your rights, please contact Pan London Single Homelessness Prevention Service at: dpo@bridgesoutcomespartnerships.org

If you raise a query or complaint in relation to your data rights, we will endeavour to respond as soon as possible. Requests for a copy of your information will be responded to within a one-month period. If you are still not satisfied with how SHPS or one of its partners is processing your information, you can write to the Information Commissioner's Office at:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Review of this privacy notice

We review this Privacy Notice to ensure we keep you up to date about what we are doing with your personal information and any changes in processing.

If you require this notice in a different format or you need further information or assistance, please contact the Data Protection Officer via the contact details listed above.