

## **The Petrus Community Privacy Notice**

Petrus Community is part of the Regenda Group. Petrus Community is a registered charity providing support, advice and housing for people who are homeless, at risk of homelessness or sleeping rough. Petrus Community processes personal information in order to provide these services.

This privacy notice tells you what to expect when Petrus Community collects personal information. It applies to information we collect about:

- people who use and/or enquire about our services
- visitors to our websites
- job applicants and our current and former employees.

### **1. What is data protection?**

The General Data Protection Regulation and Data Protection Act (2018) set out rules for processing personal information. The Act applies to personal information we might hold about you on some paper files and on computers. The Act states that those who record and use personal information must ensure that it is handled properly. Therefore we are required to ensure that personal information is:

- processed in a lawful, fair and transparent way
- held only for the purposes we collected it for
- adequate, relevant and limited to what is necessary
- Accurate
- held only for as long as we need it
- kept secure.

The Act also allows you to find out what personal information is held about you. The Information Commissioner's Office (ICO) is responsible for regulating, enforcing and promoting good practice and transparency in the access and use of personal information.

Organisations have to notify the ICO of all the purposes for which they will be processing information. We are a happy to supply you with a copy of the notification upon request or you can contact the ICO by calling 0303 1231113, or writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

You can find out more information online at [www.ico.org.uk](http://www.ico.org.uk).

### **2. What information does Petrus Community collect about its service users?**

We begin the process of collecting information about you, and if appropriate, your family, when you apply to us either directly for help and/or advice. Although the information we collect may vary, typically it may include:

- name and address

- contact details
- details of your contact with us
- gender and dates of birth for you and others who live in your household
- support needs
- income details and history of rent payments
- information on housing need for you and others who live in your household
- Information on adaptations, applications, transfer requests, etc.

Petrus Community also collects special categories of personal data, including:

- race or ethnic origin
- health and medical conditions
- religion
- sexual orientation.

We understand that you may not feel comfortable providing some of this information and consider it private. We ask some of these questions to make sure that we do not discriminate against any of our service users and because we recognise that a person's age, disability, ethnic origin, religion, sexual orientation or medical condition may affect their choice of home, the area they want to live, and the services they need.

Understanding the diversity of our service users is very important to help us work towards providing homes and services that meet everyone's needs.

***If you feel uncomfortable providing this information, you can say no.***

### **3. How we collect information about you**

We collect information in a variety of ways, including:

- When service users apply for housing
- When service users sign a tenancy agreement
- Through ongoing contact with service users during a tenancy
- When service users request or access services
- Recording calls to and from us
- When service users terminate a tenancy
- If a customer makes a complaint
- When dealing with ASB cases
- When providing welfare benefits advice
- When support plans are produced

### **4. Why do we collect this information?**

The Petrus Community collects this information for a number of reasons, including:

- Manage allocations and lettings
- to support you in maintaining your tenancy
- To support you in obtaining a range of services & provisions
- to ensure that your housing needs are met
- provide a repairs and maintenance service
- resolve ASB disputes
- investigate complaints
- engage with service users to get feedback on our services
- target service users impacted by welfare reform
- process requests from third parties, for example, Council Tax, DWP
- monitoring diversity and equality which helps to tailor services accordingly
- prevention and detection of crime
- regulatory purposes
- law requirements.

## **5. Sharing your information**

We will not share your personal information without your consent, unless allowed by law. Examples of organisations we may share your information with, where appropriate are:

- Contractors
- Local Authorities
- Housing Benefit
- Department for Work and Pensions
- Social Services
- Housing Ombudsman Service
- Police
- Probation Service
- Other landlords
- Utilities companies
- Council tax
- Debt recovery agencies
- Courts

## **6. Why does Petrus Community process your personal data?**

Petrus Community needs to process your personal data in order to manage your accommodation and support needs.

## **7. How long do we keep your personal information?**

Petrus Community has robust data retention guidelines and personal data. Records (both electronic and paper) will not be kept for longer than necessary and will be kept in accordance with the data retention guidelines.

All personal data is securely destroyed when no longer required and a register of the disposal of such records maintained. Electronic files are deleted in such a way that they cannot be retrieved and all paper records are disposed of in confidential shredding bins.

## **8. How do we take care of your personal information?**

Information is held in paper files and on our computer systems. Not all members of staff are able to access this information, only those who need to. We use the information to deliver a service to you. There may be occasions when we have to share information with others (detailed in section 5) to enable us to deliver our services and fulfil our legal and contractual obligations. We are legally required to share information in the following circumstances:

- safeguarding
- prevention or detection of crime
- apprehension or prosecution of offenders
- assessment or collection of tax or duty owed to customs and excise
- in connection with legal proceedings
- to comply with the law.

## **9. Importance of accuracy**

During the course of your tenancy or licence your needs may change so we will update our information to make sure we can provide services that meet your needs. To do this our team at Petrus Community may visit you, or we might ring you or ask you for information to find out if your circumstances have changed. Any new information will be protected in the ways already outlined.

If any of the information we send is incorrect or inaccurate, please tell us so we can make the necessary changes.

## **10. What if someone is acting on your behalf?**

If you have asked someone to act on your behalf (such as the Citizens Advice Bureau or a relative) you will be asked to supply or complete an Authorisation form, which you can get from the agency acting on your behalf or from Petrus Community.

## **11. Visitors to our websites**

When someone visits [www.petrus.org.uk](http://www.petrus.org.uk) we use a third party services, Google Analytics and Hotjar to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way

which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

You may prevent your data from being analysed by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. To learn more about how Google collects and processes data in connection with Google Analytics, visit <http://www.google.com/policies/privacy/partners/>.

You can opt-out of tracking by Hotjar here: <https://www.hotjar.com/opt-out> and can learn about Hotjar's ability to use and share information through the Hotjar Terms & Conditions of Use, available at <https://www.hotjar.com/terms>, and the Hotjar Privacy Policy, available at <https://www.hotjar.com/privacy/>.

When you use our website, no user-specific data is collected by either Petrus Community or any third party. We use Google Analytics for trend reporting and visitor behaviour to help us improve our website and search functionality.

### **11.1 Security and Performance of the Petrus Community website**

Petrus Community uses a third party service to help maintain the security and performance of the Petrus Community website. To deliver this service it processes the IP addresses of visitors to the Petrus Community website. This information is not used for identifying purposes, except for investigation if an intrusion occurs.

### **11.2 Use of cookies by Petrus Community**

The Petrus Community site uses cookies. Cookies are small text files placed on your computer by the websites you visit. They are used to help make websites work efficiently. You can control cookies through the settings of your web browser. To find out more, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

These are the cookies we use:

- Google Analytics - to monitor website use and the type of browser that is accessing the website
- Hotjar – to monitor website and page usage

## **12. People who contact us via social media**

We use a third party provider, Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message will not be shared with any other organisations.

## **14. People who email us**

Petrus Community emails are encrypted at rest and in transit, using several strong encryption protocols, and technologies that include Transport Layer Security/Secure Sockets Layer (TLS/SSL), Internet Protocol Security (IPSec), and Advanced Encryption Standard (AES). If your email service does not support the same encryption, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software.

Petrus Community use web beacons on our Websites and in our emails. When we send emails, we may track behavior such as who opened the emails and who clicked the links. This allows us to measure the performance of our email campaigns and to improve our features for specific customers. To do this, we include single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

## **10. What are your rights**

### **10.1 Right of access to your data**

If we hold personal information about you, you have the right to ask us:

- what we use the information for
- to provide you with a copy of the information you are entitled to
- to supply you with details of the purposes for which we use the information and who it is shared with
- for incorrect information to be corrected.

To see the information we hold about you, you can ask Petrus Community for a Subject Access Request form.

Once this form has been completed this should be sent to the Data Protection Officer at the address below, including:

- a detailed description of what information you are requesting
- two proofs of identity: one with your name and address (e.g. a recent utility bill) and one to confirm your identity (name and date of birth, e.g. a copy of your driving license or birth certificate).

We have one month from the date we receive the completed Subject Access Request form and appropriate identification to provide you with the information you are entitled to receive. You have the right to receive this information electronically if you wish.

### **10.2 Right to rectification**

If you think that Petrus Community is holding incorrect personal information about you, you have the right to have this personal information amended.

Once you have advised Petrus Community of the details of the incorrect data and the required amendments, your data will be updated within 30 days. If your personal data cannot be amended, Petrus Community will advise you in writing why this is the case.

### **10.3 Right to be forgotten**

You have the right to have your personal information erased if it is no longer required to manage your contract or your enquiry.

### **10.4 Right to restriction of processing**

You have the right to restrict the processing of your personal data if it is no longer required to manage your contract or your enquiry. This means that Petrus Community cannot further process your data, for example we cannot share your data with a third party.

### **10.5 Right to object**

You have the right to object to the processing of your personal information if the data is not required to manage your contract or enquiry, or you have not given Petrus Community permission to process your data, for example, for direct marketing.

## **11. Job applicants, current and former Petrus Community employees**

Petrus Community is a subsidiary of Regenda Homes. Regenda Homes is the data controller for the information you provide during the employment recruitment process. If you have any queries about the process or how we handle your information please contact us.

The following explains how Petrus Community uses the information you provide in your application, along with your rights, our reasons for requesting it and who will have access to it.

### **11.1 What information do we collect from you?**

We collect information that is specifically provided by you as part of the application process. We will collect the following (but not limited to):

- Name, address, email, telephone number
- CV (if applicable)
- Equal opportunities monitoring information (defined as special categories data) - this information is purely for statistical analysis and monitoring purposes
- Answers to application questions
- Any other information you wish to provide in support of your application

We use your details and information presented so that we can assess your suitability for employment with us and carry out our statistical analysis.

## **11.2 Why do we collect this information and who do we share it with?**

Details you provide in this application:

- Will be held on our computer systems and may be downloaded by us
- Will be used to deal with your application
- Will be made available to us and our processors
- Will be used for communication with you regarding the vacancy
- Will be used to satisfy legal requirements
- Will be used for statistical analysis
- Will be held and may be used to contact you about other vacancies

Our recruitment process requires that we contact the referees provided by you as part of our checks to ascertain suitability of employment. The content of the reference will not be shared without the referee's permission.

If you are successfully recruited, we will upload your details to our HR system, Cascade. As a member of staff you will sign a contract of employment and agree to additional terms on how your data is handled and stored.

## **11.3 How can you access the information we hold about you? Your rights**

If you choose to register on our website, you may access your profile, correct and update your details, or withdraw your details at any time. To do this, you can access your personal profile by using the secure login. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.

You have the following rights in relation to the way in which we deal with your personal data:

- the right of erasure or to be forgotten
- the right to rectification if information is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object to Petrus Community processing your personal data
- the right to withdraw your consent with regards to the handling of your personal data
- you have the right to ask for a copy of the information we hold about you (Subject Access Request)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Within your candidate account, you can also use the Download Data feature to generate an XML file of the current data we hold on you that you have provided and/or have access to within the account.

Where you exercise your right to object or withdraw your consent we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

## **11.4 Conditional offer**



If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your eligibility to work in the UK – you will be asked to attend our office with original documents, and we will take copies.
- Proof of your qualifications, if required.
- You may be asked to complete a DBS application to declare any unspent convictions, depending on the nature of the role you apply for.
- We will contact your referees, using the details you provide in your application, directly to obtain references.
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work and any adjustments we need to consider before you start. This is done through our current occupational health provider.
- Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held by our Business Assurance team.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments.
- Emergency contact details – so we know who to contact in case you have an emergency at work.
- Membership of Pension scheme – so we can send you a questionnaire to determine whether you are eligible to join the Social Housing Pension Scheme.

### **11.5 Cascade**

If you accept a final offer from us, your HR records will be held on Cascade which is an internally used employee database.

### **11.6 Health management**

Corazon provide our Occupational Health service. If we make you a conditional offer, we will ask that you complete a questionnaire which will help to determine if you are fit to undertake the work that you have been offered, or advise us if any adjustments are needed to the work environment or systems so that you may work effectively.

We will send you a form to complete and return directly to Corazon. The information you provide will be held by Corazon who will provide us with a fit to work certificate or a report with recommendations. You are able to request to see the report before it is sent to us. If you decline for us to see it, then this could affect your job offer. If an occupational health assessment is required, this is likely to be carried out by Corazon.

### **11.7 How long is the information retained for?**

If you are successful, Cascade will be the central reference for your data for the duration of your employment, plus six years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

Equal opportunities information is retained for six months following the closure of the campaign for unsuccessful candidates. Successful candidates' data will be stored via the Cascade system.

### **11.8 Fleet and mileage claims**

The organisation is required to undertake statutory checks to ensure vehicles that our staff drive on behalf of the company are road worthy. To achieve this, we require staff to provide the following documents:

- Driving license details
- MOT (if applicable)
- V5 registration document (if applicable)
- Insurance details

This information is collected to ensure that any mileage payments paid to employees are done so in accordance with health and safety legislation, which requires us to ensure all travel undertaken for the business is compliant.

In addition, we carry out checks on all staff's licenses through the DVLA to ensure they are legally able to drive both their own and company vehicles. This information includes:

- Driving convictions i.e. drink driving, speeding etc.
- Number of penalty points

This information is used to ensure all drivers are legally entitled to drive. In addition, we use this data to monitor staff who have a more than 6 penalty points on their driving license.

## **12. Complaints or queries**

Petrus Community tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Petrus Communities collection and use of personal information. However, we are happy to provide any additional

information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us at [dataprotection@regenda.org.uk](mailto:dataprotection@regenda.org.uk)

### **13. Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25 May 2018.

### **14. How to contact us**

If you want to request information about our privacy policy you can [email us](mailto:dataprotection@regenda.org.uk) or write to:

[dataprotection@regenda.org.uk](mailto:dataprotection@regenda.org.uk)

The Data Protection Officer

The Regenda Group  
The Foundry  
42 Henry Street  
Liverpool  
L1 5AY

Telephone: 0151 703 3000