



Privacy Notice

July 2019

Privacy Notice (Full)

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1 Purpose of this privacy notice

Under data protection legislation, Outward Housing, referred throughout as 'Outward', is required to explain why we collect information about our customers and tenants, how we use that information and whether we will share it with anyone else.

This Privacy Notice is a public document available to anyone, which explains how Outward collects and processes personal information in order to conduct normal business activities as a care and support organisation.

2. Who we are

We are Outward, a care and support provider, registered in England and Wales under company number 215434 and with our registered office at 4 Daneland Walk, Hale Village, London, N17 9FE. We are the part of the Newlon Group and our normal activities can be summarised as:

- Providing care and support for adults with learning difficulties, including those with complex needs
- Providing supported housing services
- Providing volunteering opportunities through our Hackney Volunteer & Befriending Service
- Managing Nutley Edge, our rural retreat providing holiday accommodation, including supported activity breaks for people with learning difficulties.

Outward is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information.

3. Personal Information sources

Outward collects personal information via a variety of sources, including when people are referred to us, or apply for one of our services, or complete one of our forms, or call, write, email or meet with us. We may collect information when people visit our website.

There is a CCTV system in operation at our registered office, at Nutley Edge and some of our housing schemes for the detection and prevention of crime. It operates continuously and recordings are held for up to one month.

From time to time we may take photographs at our events and at our schemes to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with the consent of the people concerned.

If the person is a customer or a tenant receiving support from us, we may receive information from third parties including:

- Their council when making a care and support referral
- Health, care and support organisations
- Family, friends and advocates acting on their behalf.

4. Types of personal information we use

If the person is someone we support, the information we will have will include:

- Name, address and contact details
- Date of birth
- National Insurance number
- Details of anyone authorised to act on their behalf.

The information we may collect about includes:

- Care and support information – to tailor our service to better meet the person’s particular needs
- Financial information – to ensure they receive full benefit entitlements and to help them budget and pay bills
- Health information – to support them in administering medication and accessing the medical care and treatment they may need
- Details about the contact that they have had with us and the services that we have provided.

5. What we do with personal information

The information we require from the people we support and others is used to provide care and support and, where necessary, to manage their tenancies.

Other data processing activities include:

- Processing job applications, where people are applying for work with us
- Making referrals, where people apply for voluntary work
- Keeping stakeholders informed of the work of the organisation
- Marketing activities and taking bookings at Nutley Edge
- Analysing usage of our websites

Through the Newlon Group, Outward uses a range of information and communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

Through the Newlon Group, Outward holds information in an IT system which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

6. How we use sensitive information

Some of the information which we collect will be special categories of personal data, also called sensitive personal data, such as information about ethnic background or health. We will use information about race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and to make suitable adjustments to the services we provide.

Under exceptional circumstances, we may share information with relevant authorities in order to

comply with our legal obligations or to protect people's vital interests. For example, we may share health information with the emergency services in the event of an emergency or serious incident.

7. Children's information

Outward does not normally process children's information as part of its care and support work, as most of its work is with adults. However, we record children's basic information if they are closely involved in the lives of the people we support. This is to ensure both the safeguarding of the children and the people we support.

8. Who we share data with and how long we keep information

Outward shares personal data with:

- Health, welfare and social services professionals with whom we work to provide care and support services
- Our contractors, who are carrying out services on our behalf. These contractors are required to ensure that personal information is managed appropriately and for specified purposes, including carrying out property repairs.

Outward may need to share personal information with government departments and agencies, with our regulator and auditors, with utility companies or with other organisations and agencies where we are legally allowed to do so. In addition, Outward may share information with third parties, including the police in the case of missing persons.

Information relating to the people we support will generally be kept for the period they remain with us, or as required by the contract held with the council for the services provided to an individual. Information about tenancies will be kept for up to six years following the end of a tenancy. The basic history of who held a tenancy at which property and when will be held forever.

For advice about retention periods in relation to other data processing activities, email dataprotection@outward.org.uk.

9. What may happen if we are not provided with personal information

If we are not provided with the personal information we need, then we may not be able to provide the help the people we support need.

10. What we will not do with personal information

- We will not sell personal information to third parties
- We will not pass on personal information to unrelated third parties unless we are allowed or required to do so by law or we have explicit permission to do so
- We will not transfer or store personal information outside of Europe (the European Economic Area) outside of the control of the UK/European regulations.

11. Your rights, the right to complain and the ICO

People have the right to request a copy of the data we hold about them. People should contact dataprotection@outward.org.uk if they wish to have any personal information Outward has on them. We will always endeavour to answer questions as part of our friendly, helpful service. We will not normally make a charge for this service and will respond within one month of receiving a request.

It will be helpful if people making subject access requests can be specific about what personal data they want to see, what it relates to and within what timeframe, as that will assist our search.

People have the right to correct information that we hold. Please advise us of any changes or corrections by emailing dataprotection@outward.org.uk.

12. Right to withdraw consent and other rights

People may withdraw their consent to use any information that was previously provided with consent. They should advise us to withdraw any consent previously given to us by emailing us at dataprotection@outward.org.uk.

People have other rights, which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about data protection law at <https://ico.org.uk/>.

People also have the right to complain about how we use personal data. In the first instance, they can complain directly to us at dataprotection@outward.org.uk. They can also complain about our use of their personal information to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/>. Our registration number is Z1216891.

13. Changes to our Privacy Notice

Outward's Privacy Notice is regularly kept up-to-date and this version was updated on 24 May 2018 and amended again in July 2019. The latest full version is always available on our website.