# **Privacy Statement and Notice**



Data Controller: Inspire North, 3 Limewood Way, Leeds LS14 1AB

Tel: 0113 2739660, E-mail: informationgovernance@inspirenorth.co.uk

#### Introduction

At Inspire North, we are committed to ensuring that your personal data is protected and never misused.

Our privacy policy explains what personal data we collect, why we collect it, how we use it, the control you have over your personal data and the procedures we have in place to protect your personal data. It applies to personal data we collect through our websites, services and products (explained in more detail below).

By sharing your personal data with us, and by continuing to use our websites, services and products, you confirm that you have read and understood the terms of this privacy policy. We take responsibility for the personal data we collect about you, and we aim to be fair and transparent about how we handle it, and give you control over it.

If you have any questions, comments or concerns about any aspect of this policy or how Inspire North handles your information please email our Team at <a href="mailto:informationgovernance@inspirenorth.co.uk">informationgovernance@inspirenorth.co.uk</a>

## **Privacy Principles**

Privacy policies can be complicated. We have tried to make ours as clear and as accessible as possible. To help, we have also summarised how we handle your personal data at Inspire North in our privacy principles below. These principles demonstrate our commitment to protecting your privacy and handling your personal data in the right way and as you would expect it to be handled.

#### At Inspire North we:

- 1. Will only ask for or collect the personal data we need to provide and improve the service, products and experiences our clients expect.
- 2. Give you control over the personal data we hold about you to ensure it is accurate and reflects your preferences.
- 3. Make sure your personal data is always secure and protected.
- 4. Are fair and transparent about how we use the personal data we hold.
- 5. Only ever use your personal data for the purpose that you trusted us to use it for.
- 6. Will never sell your personal data and only share it as outlined in our privacy policy or when you ask us to.
- 7. Respect your choices and will inform you if there are important changes that affect your personal data or how we use it.

Take responsibility for the personal data that we hold about you.

#### Who are we?

Inspire North is a charitable Community Benefit Society registered in England and Wales under the Cooperative and Community Benefit Societies Act 2014, FCA Registered Number: 9518. It is also a Registered Social Landlord (Registration No. 4688). Registered Office: 3 Limewood Way, Leeds, LS14 1AB.

We're here to create a world where everyone matters, building brighter futures for people within the health, housing and social care sector. Our heritage is important to us and we're not afraid to be different; making a meaningful difference is at the heart of what we do. We are continually evolving while always staying true to our values.

We are passionate about what we do and treat everyone with respect.

Inspire North must process personal data, which at times will include special category personal data, so that we can provide our services. In doing so, Inspire North may act as either a controller or processor of personal data. Whether we are a controller or processor of your personal data will depend on the service that you are accessing and/or your relationship with us. More information about our role can be found within this Privacy Notice.

This notice applies to data processed by Inspire North about residents, tenants, individuals who have accessed our services, and any other clients.

The organisation has appointed a Senior Information Risk Owner (SIRO). The role of the SIRO involves taking ownership of the organisation's information risk policy, acting as an advocate for information risk on the Board and providing written advice to the Accounting Officer on the content of their annual governance statement with regard to information risk.

In addition, we have a Caldicott Guardian (Director of Operations) who is responsible for protecting the confidentiality of patient and service-user information and enabling appropriate information-sharing.

## What is personal data?

Personal data means any information relating to you that identifies you, or through which you can be identified, directly or indirectly. In particular, by reference to an identifier such as a name, an identification number, location data, or an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

## Special category data

There may be instances where it is necessary for you to share information with us containing special categories of personal data. This includes information relating to racial or ethnic origin, physical or mental health, sex life or sexual orientation, religious or philosophical beliefs, political opinions, and membership of a Trade Union.

We minimise our holding and use of special category data but, given the services we provide, there are times when we use it to understand our customers and their needs better, for example when providing menial health and housing support to clients.

We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with our services, or to deal with any legal action. We will inform you of what we will do with this information and who we will share it with.



#### Criminal offence data

Some of our services involve providing criminal justice services across Yorkshire and the North East. This means at times we may process some personal data relating to your criminal convictions.

We will usually be processing this information to allow us to comply with our legal obligations, act in the substantial public interest in relation to the services we provide, to provide you with our services, or to deal with any legal action. We will inform you of what we will do with this information and who we will share it with. We will inform you of what we do with this information and who we will share it with.

## What personal data we collect

We will collect and process the following data about you:

- Information you give us/information we receive from other sources. This may include but is not limited to your name, address, e-mail address and phone number, financial and credit card information, sensitive personal data, (for example health data, sex life, sexual orientation, biometric data etc), personal description and photograph.
- Information that is automatically collected when you visit our website:

This information is data that is automatically collected when you visit our website such as: information about your visit such as the URL, date and time of visit, length of time spent on certain pages and interactive information such as scrolling and clicks, methods used to browse away from the page such as links, traffic data, location data, any data provided when requesting further advice or services such as through our enquiry service, IP address used to connect your device to the internet, domain, country, browser type, operating system and/or platform.

A list of Inspire North's activities can be found at <a href="https://www.inspirenorth.co.uk/">https://www.inspirenorth.co.uk/</a>

## How do we collect your personal data?

Most of the personal data we process is provided to us directly by you for one of the following reasons:

- You are enquiring about our services via an inbound enquiry
- When you write, email or meet with us
- When you respond to a survey

## We also receive personal data indirectly, from the following sources in the following scenarios:

- We may process information that you post on social media about is, if it relates to a situation that we need to be aware of an/or take action on
- Organisations that we have a contract with to provide services on our behalf (our data processors), for example, maintenance and repairs, customer surveys etc.
- Local authorities (councils)
- Information we receive about you from any of the other organisations that commission or
  provide services on behalf of Inspire North, or provide services to you alongside us, e.g. the
  NHS or work in partnership with us. In this case we will ensure that either the organisation
  has previously informed you that we will be provided with the information, or we will inform
  you as soon as practicable after the receipt of the information
- Central government departments
- Credit reference agencies for credit checks and information about your financial status/history when you apply for any housing services
- Police forces and other public bodies such as fraud departments, enforcement authorities –
   e.g., crime prevention, fraud prevention etc.

 Relevant utility providers – where your heat/energy bills are included in your rent/service charge, we receive information about your energy usage

#### How we use personal data

## We may use the information we hold about you in the following ways (but not limited to):

- To provide services to you and your carers or to assess your needs
- To report on the services we provide, and outcomes, to commissioners and our Board or other relevant parties
- To further our understanding of outcomes and effectiveness of the services we provide
- To provide services to employees, potential employees and volunteers including the Board
- To continually improve our services

## Information we collect about you via our website

We will use this information to (but not limited to):

- Administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- Improve our site to ensure that content is presented in the most effective manner for you and for your computer
- Allow you to participate in interactive features of our services when you choose to do so
- Help keep our site safe and secure
- Make suggestions and recommendations to you and other users of our site about services that may interest you or them

# How our services affect the use of your personal data

At Inspire North we pride ourselves on the various services that we provide. Depending on the service that you have accessed, and the way you have accessed it, will depend on what, how and where we use your personal data.

Based upon the service you have accessed, we may be a data controller, data processor, or joint controller of your personal data. The role we play will also impact the location on where your data is stored, for example when working with the NHS your data may be stored on the NHS's systems, however when you have directly engaged with us, your data may be stored on Inspire North's systems.

When we are engaged with another party such as the NHS, we will always ensure that there are appropriate measures in place to ensure that your data is kept secure, and is only used in line with the UK legislation.

For more information on how your service uses your information, please contact informationgovernance@inspirenorth.co.uk.

## The legal basis for processing your information

The UK GDPR requires that a Controller must have a legal basis for processing Personal Data. These may be:

- Your consent. We will obtain you consent directly from you, and you are able to withdraw your consent at any time. You can do this by contacting informationgovernance@inspirenorth.co.uk
- We have a contractual obligation
- We have a legal obligation
- We have a vital interest
- We need it to perform a public task
- We have a legitimate interest



In some cases, we may process special category data. This is afforded some extra protection due to its sensitive nature, and therefore, under UK and EU GDPR we are required to provide a lawful basis for processing, and a secondary condition under Article 9. The conditions we may rely on are:

- Explicit consent
- Employment, social security and social protection (if authorised by law)
- Vital interests
- Not-for-profit bodies
- Made public by the data subject
- Legal claims or judicial acts
- Reasons of substantial public interest (with a basis in law)
- Health or social care (with a basis in law)
- Public health (with a basis in law)
- Archiving, research and statistics (with a basis in law)

The table below sets out the broad categories of information we process and the legal basis for processing it:

Data Item	Reason for Processing
Referral Data:	
Reason for referral	To assess eligibility for service and identify support needs
Support Needs	
Demographic Data:	
Gender	
Religion	To monitor the access, effectiveness and outcomes of our services to diverse communities and to ensure we can work effectively with individual needs
Ethnicity	
Address	
Sexual Orientation	
Pregnancy	
Ex-armed forces	
Criminal Convictions	
Housing Data:	To understand previous history, identify any homeless/arrears issues
Landlord	
Previous accommodation inc. Prison	
Access Requirements	
Tenancy Type	
Arrears	
Dependent in household and if a child the age	



Disability Data:	
Disability Type	To ensure our services are accessible (see demographic data above
Communication Support and Language	
Mental Health Data	To assess for service eligibility, identify support needs and risk management tools
GP data:	To ensure registered and to enable effective communication with Primary care e.g. in crisis situations
Registered with	
Name and Address	
Next of Kin Data:	To ensure we can contact someone in an emergency. Identify relatives and carers as part of support network
Contact details and if live with client	
Service Data (work carried out within the service in case notes, support plans etc.)	To document the work our services do
Category of support	
Close reason/Eviction	
Financial Data:	
In employment	To document the work our services do and ensure client is receiving full benefit or other financial support/entitlement
Receipt of benefits/type	
In education	
National Insurance Number	
Risk Data:	
Classification	Assess risk and ensure a robust management plan is in place
Risk Alert Personal Data	
Client Case Notes	To record work with clients
Medical Data (Covid vaccination data)	To assess risk
Drug and Alcohol scripts Medications	To deliver services so can support clients with health and wellbeing

In other instances, we may have a legitimate interest to process your information for our internal business and administrative functions. Other types of legitimate interest we might have in processing or sharing your personal data may include preventing loss of revenue and fraud prevention. For example, we may pass your details to a debt collection agency if you have not paid your rent or service charge (in pursuit of our legitimate interest in preventing loss of revenue).

# **Automated Decision Making and Profiling**

We may analyse your personal data to help us assess your needs. This will allow us to contact you with information that is relevant to the services we offer to you.

Any personal data we use for analysis/profiling will be processed in line with our legal basis for processing that is listed in more detail within this notice.



## Who has access to your personal data?

- We may disclose your personal data to third parties where this is necessary for operational purposes in order to facilitate the provision of our services or where required to do so by law.
- We may on occasion disclose your personal data to third parties (including but not limited to our service providers or agents and other local authorities for purposes set out in this policy and specific terms of use as required at the point of collection).
- We may also disclose your personal data to third parties if it is to fulfil a legal duty or to enforce our terms of use.

## How to manage contact preferences and consent

With your consent we may contact you via email and/or phone to promote or inform you about our services. If you have provided consent, we may also contact you to promote services provided by third parties. Where we are legally required to obtain your consent to provide you with marketing materials, we will only provide you with such marketing materials if you have provided consent for us to do so.

Where we contact you for direct marketing purposes, we will comply with the requirements set out in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us at any time you can unsubscribe or 'opt-out' by contacting us at <a href="mailto:informationgovernance@inspirenorth.co.uk">informationgovernance@inspirenorth.co.uk</a>.

To find out how to manage your contact preferences and consent please read the specific subject and services section below.

## How long will we keep your personal data?

We will only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, which may include satisfying any legal, accounting, or reporting requirements. The retention period depends on the type of personal data and the reason we are processing it.

When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed.

When we determine that personal data can no longer be retained (or where we must comply you request us to delete your data in accordance with your right to do so) we ensure that this data is securely deleted or destroyed.

#### Non-EEA Data Transfer

To provide our services, we may need to share your Personal Data with third parties and suppliers outside the European Economic Area (the "EEA"). If we do this, we will ensure your Personal Data receives the same protection as if it were being processed inside the EEA. For example, our contracts with our suppliers stipulate the standards they must follow to process Personal Data.

We currently implement the following safeguards to protect your personal data:

- Encrypting data when in transit.
- Implementing standard contractual clauses (SCCs), as approved by the European Commission.
- Implementing a International Data Transfer Agreement
- Where applicable, utilising the UK Extension to the EU-US Data Privacy Framework



## Your rights

You have rights under the data protection legislation and, subject to certain legal exemptions, we must comply when you inform us that you wish to exercise these rights. There is no charge, unless your requests are manifestly unfounded or excessive. In such circumstances, we may make a reasonable charge or decline to act on your request. Before we action your request, we may ask you for proof of your identity. Once in receipt of this, we will process the request without undue delay and within one calendar month. In order to exercise your rights please contact informationgovernance@inspirenorth.co.uk.

You can contact us if you wish to complain about how we collect, store and use your personal data. It is our goal to provide the best possible remedy with regard to your complaints.

However, if you are not satisfied with our answer, you can also contact the relevant competent supervisory authority. In the UK, the relevant supervisory authority is the Information Commissioner's Office (ICO), contact details of which can be found below.

Your rights in connection with personal data are set out below:

**Subject Access Request -** You have a right to receive a copy of all the personal data we hold about you.

**Rectification** - If any of the personal data we hold about you is incomplete or inaccurate, you have a right to have it corrected.

**Erasure** - This is also known as the "right to be forgotten". You have a right to ask us to delete your personal data where there is no good reason for us continuing to process it. However, certain criteria apply and if we have a legitimate reason to continue processing your personal data, we will not be legally required to delete it.

**Objection -** You have a right to object where we are relying on legitimate interests as our legal basis for processing your personal data but, in certain circumstances we may be able to continue with the processing. For example, if we have compelling legitimate grounds which override your interests, rights and freedoms or your personal data is needed for the establishment, exercise or defence of legal claims. However, you have an absolute right to object to us processing your personal data for direct marketing purposes.

**Restriction** - You have a right to ask us to restrict the processing of your personal data in certain circumstances. For example, you may require us to suspend processing information about you whilst checks are made to ensure it is accurate.

**Portability -** You have the right to ask us to transfer any personal data you have provided to us to another party, subject to certain criteria being satisfied. We will provide this personal data in a structured, commonly used and machine-readable format.

**Right to withdraw consent** - If you have given us your consent for the processing of your personal data, you can withdraw this at any time. Please note, the withdrawal has no effect on the legality of the data processing carried out in the past on the basis of your consent. To exercise your right to withdraw consent contact us at informationgovernance@inspirenorth.co.uk.

**Right to complain -** If you are unhappy with the way in which your personal data has been or is being processed, you have the right to make a complaint about it to the ICO.



They can be contacted at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

www.ico.org.uk

if you want to contact us in writing to exercise any of the above rights our address is: Information Governance Inspire North
3 Limewood Way Leeds
West Yorkshire
LS14 1AB

# **Information Security and Privacy**

In order to protect your Personal Data, we put in place appropriate organisational and technical security measures. These measures include ensuring our internal IT systems are suitably secure and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, we will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

Although we use appropriate security measures once we have received your Personal Data, you will appreciate that the transmission of data over the internet (including by email) is never completely secure. We endeavour to protect Personal Data, but we cannot guarantee the security of data transmitted to or by us.

## Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what is called a 'cypher'. The hidden information is said to then be 'encrypted'.
- Pseudonymisation, meaning that we'll use a different name or key so we can hide parts of your personal information from view. This means that someone outside of Inspire North could work on your information for us without ever knowing it was yours.
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it.
- Data stewardship is a way for us to be clear about who is responsible for what data and sets
  out clearly who has access to the data limiting access to only those who need it to carry
  out our duties.
- All our staff undertake annual mandatory data protection training. Training our staff allows
  us to make them aware of how to handle information and how and when to report when
  something goes wrong.
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates.

## **Privacy Statement Changes and Previous Versions**

We will review and update this privacy policy at least once a year and will note the date it was last updated below.



If we change our privacy policy, we will post the details of the changes below. If we have your e-mail address, we may also e-mail you with information on those changes. If we need to, we will also ask you to confirm that you are happy with those changes.

We stand behind the commitments we have made. We will never change our policies and practices in a way that will offer less protection for personal data that we already have about you without your consent.

This privacy policy was last reviewed and updated in March 2025.

# **Specific Transactions Privacy Notices CCTV**

#### What is CCTV?

CCTV stands for closed circuit television and is the term used to cover various types of video monitoring and security cameras. This information may be about staff and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance.

CCTV images, if they show a recognisable person, are considered personal data and are covered by data protection legislation. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the legislation. They do not have the right of instant access.

#### Contact details specific to CCTV

If you have any queries that are specific to CCTV at Inspire North's email: info@inspirenorth.co.uk

## How we use your information for CCTV

Inspire North operates CCTV to maintain the safety and security of property, premises, and people. It may also be used to monitor staff when carrying out work duties and to assist in connection with disciplinary procedures in cases of serious misconduct.

Under the General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are:

- Legitimate Interest
- Legal Claims
- Substantial Public Interest

# Who will have access to my personal data?

Services that form part of Inspire North.

For organisations who work in a consortia arrangement with an Inspire North, access to your personal data is restricted to the agencies that are providing a service to you and is only shared in direct relation to those services. Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, security organisations and persons making an enquiry.

## What information is processed?

The information processed may include visual images, personal appearance and behaviours.

#### **Retention period**

Unless required for an active investigation, recorded images will be retained for 30 days after which time the images are automatically overwritten by the recording equipment. Recordings that are retained as part of an active investigation will be destroyed as soon as they are no longer required to be kept. All media containing images will be securely destroyed at the end of their lifespans.



## **Summary of rights**

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

#### Cookies

#### What are cookies?

When you visit the Inspire North websites, we may issue a 'cookie' to your computer.

Inspire North may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help to improve the site and to deliver a better and more personalised service. Some of the cookies used are essential for this site to operate. If you continue to use this site, you agree to our use of cookies.

Cookies are small text files that are stored by your browser on your computer's hard drive. They help us speed things up for you when you come back. Most web browsers automatically accept cookies, but you can usually change your browser to prevent that. Even without a cookie you can still use the Sites but functionality will be restricted. If you'd like to find out more about the cookies we use, what we use them for and how to disable cookies the Interactive Advertising Bureau has produced a guide (see <a href="http://www.aboutcookies.org/">http://www.aboutcookies.org/</a>) which explains to users how cookies work and can be managed.

## Contact details specific to cookies:

If you have any queries that are specific to the websites operated by Inspire North email: informationgovernance@inspirenorth.co.uk

#### How we use your information via cookies?

Inspire North uses Google Analytics to measure and analyse user information related to our Sites. For that purpose, on the basis of your IP Address, Internet traffic data and data on your browser type and PC are collected, among other things. We will not use the data to identify you personally. When we collect personal data relating to users of the Sites, - for example for the provision of electronic newsletters, we will provide specific conditions about the use of such information at the point of collection. If you would like to receive more information on Google Analytics and the kind of information it collects and processes please refer to Google's website and its privacy policy on that website.

Under the United Kingdom General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are:

Legitimate Interest to keep our website updated and relevant.

## Who will have access to my personal data?

Google Analytics data relating to site visits is accessible by the Communications Lead. There is no personally identifying data available via Google Analytics. If you would like to receive more information on Google Analytics and the kind of information it collects and processes please refer to Google's website and its privacy policy on that website.

#### What information is processed?

Your IP Address, Internet traffic data, including session times and pages visited, and data on your browser type and PC.

#### **Retention period**

Analytics data relating to sites is retained for a period not exceeding 26 months. The cookies themselves are stored on your computer hard disk and are subject to whatever options are in force in your browser.



## **Summary of rights**

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

To find out more about how we use Cookies, please see our Cookie Notice here.

# **Email and Electronic Communication Systems**

# What are email and electronic communication systems?

Email and electronic communication systems include telephony (including call recording), voice mail, instant messaging (such as MS Teams or Skype for Business), electronic mail, social platforms (such as Facebook, Instagram or X), collaboration/session recording platforms (such as Skype for Business), file sharing platforms (such as OneDrive), or any other method that you can use to communicate with Inspire North electronically.

# Contact details specific to email and electronic communication systems

If you have any queries that are specific to the electronic communication systems operated by Inspire North, you can email: <a href="mailto:informationgovernance@inspirenorth.co.uk">informationgovernance@inspirenorth.co.uk</a>

## How we use your information via email and electronic communication systems

Due to the general nature of email and electronic communication systems the information you provide will be used in a variety of ways, depending on the reason it was submitted. Information submitted via electronic communications systems will be processed in accordance with this privacy policy and UK law.

#### Who will have access to my personal data?

Wherever practical we will always tell you if we intend to share your information with third-parties when using our electronic communication systems. In the majority of cases the information will not be shared outside of the intended recipients, or groups of recipients but the actual recipients of the data will vary depending on the context in which the information is provided. Inspire North will make every effort to advise you who might be able to access your data during the interaction.

## What information is processed?

The information processed will vary based upon the nature of the contact. Due to the interactive nature of electronic communication systems it is likely that you will be aware of what information you are sharing. Inspire North will make every effort to inform you of how your information will be processed during the interaction.

Under the United Kingdom General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are:

- Legitimate Interest
- Contract

#### **Retention period**

The retention period will vary based upon the nature of the contact. Inspire North will make every effort to inform you of the retention period during the interaction.

# **Summary of rights**

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

## **Payment Account Details**

# What are payment account details?

In order to make or receive funds Inspire North will store details about your bank or building society account.



## Contact details specific to payment account details

If you have any queries that are specific to the how we handle payment account information email: finance@inspirenorth.co.uk

## How we use your information for payment account details

Your bank account details will be stored securely, and we will not use them for any purpose which you have not authorised, nor disclose them to third parties without your permission.

## Who will have access to my personal data?

Your payment account details will be used by Inspire North employees and contracted data processors to process orders, collect rental payments, and distribute funds such as loans.

# What information is processed?

• For bank or building accounts we may record the account holder's name, the branch address, sort code, account number, and signature.

Under the United Kingdom General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing your information are:

Contract

#### **Retention period**

Your bank or building society details are retained for as long as you provide authorisation and are deleted when no longer necessary.

## **Summary of rights**

You have a number of statutory rights that are explained in the section above titled "Summary of the your rights".

## **Case Management Systems**

#### What is a Case Management System?

The Case Management Systems are where we store your data regarding the service we provide.

Your data will be stored on Inspire North's case management system – known as InspireNorth.Net (INet). This is a computer database and web-based IT System managed by Inspire North.

If you are accessing Linking Leeds Service, your data is stored on SystmOne. Please refer to Linking Leeds Service Privacy Notice.

Information regarding incidents, feedback including satisfaction, complaints, compliments and concerns will be stored separately on Datix. This is a web-based incident reporting software managed by Inspire North.

Please check with the service you are accessing which Case Management System/s they use to store your data.

# **Contact details specific to Case Management Systems**

If you have any queries that about the case management systems at Inspire North please email: <a href="mailto:informationgovernance@inspirenorth.co.uk">informationgovernance@inspirenorth.co.uk</a>

## How we use your information via the Case Management Systems

Inspire North keeps records of information provided to us from you and other organisations in relatic to the support we are providing to

you. Where relevant, we will also keep information relating to your tenancy or licence.



Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing your information are:

- Legitimate Interest
- Vital Interest
- Specific Consent where you have provided consent to us using your data in a certain way such as contacting a utility company

Data is also used to improve and update our systems where appropriate.

## Who will have access to my information?

Only agencies that have access to the InspireNet system and are providing you with a service will have access to your data. These will only ever be services that form part of Inspire North including other organisations that come in to Inspire North.

For organisations who work in a consortia arrangement with an Inspire North service, access to your personal data is restricted to the agencies that are providing a service to you and is only shared in direct relation to those services. The information will only be used for the purpose of providing the service you need and will be done in your best interests.

InspireNet is a one client record therefore if you access multiple services within Inspire North your worker will see your complete record i.e. information from other services. Information can be restricted at your request on a case by case basis. Please ask your case worker for more information.

Your information will not be shared with third parties outside of this without your consent unless required by law, such as:

- 1) To other statutory agencies in the event of a safeguarding concern where you or anyone else is likely to be seriously harmed
- 2) In the detection and prevention of fraud or crime
- 3) Any legal request by a court or authorised body that requires us to release information to them.
- 4) Regulatory requirements i.e. Continuous Recording of Lettings and Sales in Social Housing in England Submission

We will always try and tell you when information is being shared unless this increases the risk to you or anyone else, or if we cannot contact you.

If we need to share information without your consent, we will talk this situation through with a senior member of staff and get their permission. We will record what we have shared, why and who with. Unless the situation arises where telling you will increase the risk to you or someone else, we will always inform you where we have shared information in this situation.

#### What information is processed?

We keep records of information provided to us from you and other 3rd parties in relation to the support we are providing to. Where relevant, we will also keep information relating to your tenancy o licence with us.

#### **Retention Period**

All information gathered will be confidentially destroyed and disposed of in line with Inspire North's policies and procedures and relevant legislation. Please be assured that everything you tell us will be treated confidentially and we will ensure that we abide by current data protection laws and other laws governing privacy and security or personal data.



#### Will my information be safe?

Yes, your personal data will be held in accordance with current Data Protection legislation by Inspire North. Access to your data is restricted:

• Only services with current (live) referrals can access your record.

If access is requested by a service which does not have a 'live' referral this triggers an alert and the staff member must provide reasons why they are accessing the record. All access is monitored on a quarterly basis. If your record is accessed without purpose, in line with GDPR requirements we will notify you and implement our data breach procedure within appropriate timelines.

## What happens if I do not wish my data to be stored by Inspire North?

We will be unable to provide you with a service if you decline to have your data stored within the InspireNet system.

## What if I am being re-referred within Inspire North?

As your record is a 'one client record', and the time between leaving the service and being rereferred is within Inspire North's Data Retention and Destruction schedules, your data will still be on InspireNet in a 'closed' state. This means that when you are re-referred your record will simply be re-opened.

# Summary of rights

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

#### **Media Consent**

#### What is Media?

Media Consent is where you have given permission for Inspire North to use images, videos or case studies featuring you or your dependent(s). The media we capture of you or that you provide may provide identifying details. In signing the consent agreement form you specify how you want this to be used. Your media and consent agreement will be stored on a secure drive in Inspire North's servers.

#### **Contact details specific to Media Consent**

If you have any queries about media consent or wish to withdraw your consent please contact communications@inspirenorth.co.uk.

#### How we use your information for research

Images, video or written personal details you supply to Inspire North featuring you and/or any dependent(s) will be used in accordance with the terms of the media consent agreement, supplied at the time of capture or transfer. The data supplied can be accessed by employees within the service you are accessing as well as the Central Services Team and Development and Innovation Directorate at the Inspire North Head Office. Only data that you allow use of for external communications will be used. The agreement form sets out this usage, which includes our websites, social media channels, leaflets, banners, posters and other printed materials.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing your information are:

Consent

#### Who will have access to my personal data?

The media you supply will be visible in organisational communications unless you specify otherwise on your consent agreement. The images, video and/or case studies, along with your signed consent agreement, will be held on a secure server and accessible only by employees within your service, Central Services and the Development and Innovation Directorate.



## What information is processed?

Data you supply for use in Inspire North's electronic communications can include images, video, personal details including identifying details such as your name and location. For providing consent we will need to process your signature.

#### **Retention period**

Images and video will be retained for a period not exceeding three years. At this point you will be contacted to ask if you wish to extend your permissions under the media agreement. If you do not wish to extend permissions or we cannot contact you, your data will not be retained.

#### Summary of rights

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

## **Supporter Data**

Supporter Data is any data you supply Inspire North with when you donate to the organisation. This could be via a donation platform, such as the embedded Blackbaud donation pages on our website, or directly to us via a bank transfer, cheque, or cash. Inspire North will store all data relating to a donation for a period of six years. After this time your data will be securely destroyed.

You may also supply your data to us to receive updates about the work we are doing and any fundraising activities or campaigns that we may be running. At the time of your donation, you will be asked whether you consent to Inspire North using your details for marketing purposes. If you give your consent, your data will be stored and used by Inspire North to contact you with updates.

Your data and consent agreement will be stored on a secure Blackbaud Raiser's Edge database.

## **Contact details specific to Supporter Data**

If you have any queries about how your data is stored, marketing consent, or you wish to withdraw your consent please contact fundraising@inspirenorth.co.uk.

#### How we use your information

Any personal details you supply to Inspire North featuring you and/or any dependent(s) will be used in accordance with the terms of the consent agreement, supplied at the time of capture or transfer. The data supplied can be accessed by employees within the Development and Innovation Directorate at the Inspire North Head Office. Only data that you allow use of for marketing purposes will be used.

Under the UK-General Data Protection Regulation (UK-GDPR), the lawful bases we rely on for processing your information are:

- Legitimate Interest
- Consent

## Legitimate Interest

We will process the following information under Legitimate Interest: name, address, email address and donation information. A Legitimate Interest Assessment has been completed and is detailed below:

We have a specific purpose with a defined benefit: Our purpose of processing the above information is to monitor who we receive donations from. The aim of processing is to understand our donation history and use it to improve our fundraising practices.

The processing is necessary to achieve the defined benefit: The information is necessary as without it we will not be able to monitor who we receive money from or track our donation history. Without such information we will be able to understand our donations and improve our fundraising practices.

The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms: The information being processed is kept to the minimum needed to help us identify our donors and track their donation history. The data subject can request that they do not wish for their data to be processed under Legitimate Interest.

# Who will have access to my personal data?

The data you supply along with your consent agreement, will be held on our Blackbaud Raiser's Edge database. Information provided will only be accessible to those with permissions and responsibilities for donor management.

## What information is processed?

Any data you supply when making a donation or consenting to marketing is processed and stored.

## **Retention period**

Data relating to a donation made will be stored for a maximum of six years. Data captured through marketing consent will be stored indefinitely. If you do not wish for your data to be stored at any point please contact <a href="mailto:development@inspirenorth.co.uk">development@inspirenorth.co.uk</a>.

## **Summary of rights**

You have a number of statutory rights that are explained in the section above titled "Summary of your rights".

