# A picture containing text, clipart Description automatically generatedPrivacy Statement and Notice

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| **Data controller: Inspire North (Northern) Ltd, 3 Limewood Way, Leeds LS14 1AB**   **Tel: 0113 2739660, E-mail:** [**info@inspirenorth.co.uk**](mailto:info@inspirenorth.co.uk) | |
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| **Introduction**  At Inspire North, we are committed to ensuring that your personal information is protected and never misused.  Our privacy policy explains what personal information we collect, why we collect it, how we use it, the control you have over your personal information and the procedures we have in place to protect your personal information. It applies to personal information we collect through our websites, services and products (explained in more detail below).  By sharing your personal information 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 information 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 [**informationgovernance@inspirenorth.co.uk**](mailto:informationgovernance@inspirenorth.co.uk) | **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 information at Inspire North in our privacy principles below. These principles demonstrate our commitment to protecting your privacy and handling your personal information 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 information we need to provide and improve the service, products and experiences our clients expect. 2. Give you control over the personal information we hold about you to ensure it is accurate and reflects your preferences. 3. Make sure your personal information is always secure and protected. 4. Are fair and transparent about how we use the personal information we hold. 5. Only ever use your personal information for the purpose that you trusted us to use it for. 6. Will never sell your personal information 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 information or how we use it. 8. Take responsibility for the personal information that we hold about you. |
| **Who are we?** (expand/collapse)  We’re here to create a world where everyone matters, building brighter futures for people within the health, housing and social care sector through our family of organisations.  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.  Please send an email to [informationgovernance@inspirenorth.co.uk](mailto:informationgovernance@inspirenorth.co.uk)or write to:  Information Governance  3 Limewood Way Leeds West Yorkshire LS14 1AB  The organisation has appointed Sinéad Cregan [sinead.cregan@inspirenorth.co.uk](mailto:sinead.cregan@inspirenorth.co.uk) as 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 (Acting Group Director of Operations) who is responsible for protecting the confidentiality of patient and service-user information and enabling appropriate information-sharing. | |
| **What Personal Information we Collect**  We will collect and process the following data about you:   * **Information you give us.** This is information about you that you give us, by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our website, access or apply to access our services, participate in discussion boards, chat facilities or other social media functions on our site, enter a competition, promotion or survey and when you report a problem or complaint to Inspire North about any of the services in our group. The information you give us may include - but is not limited to - your name, address, e-mail address and phone number, financial and credit card information, sensitive personal information, (for example - Health data, sex life, sexual orientation, biometric data etc), personal description and photograph. * **Information we receive from other sources**. This is information we receive about you from any of the other organisations that commission or provide services on behalf of Inspire North, 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.   A list of Inspire North’s activities can be found at [**https://www.inspirenorth.co.uk/**](https://www.inspirenorth.co.uk/) | |
| **How We Use Personal Information**  **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 * To report on the services we provide, and outcomes, to commissioners and our Board of Trustees * To further our understanding of outcomes and effectiveness of the services we provide * To provide services to employees, potential employees and volunteers including Trustee * 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.   **The Legal Basis For Processing Your Information**  The legal basis for processing your information is usually that the processing is necessary for a contract we have to deliver the support you receive from Inspire North, under UK-GDPR Article 6 (f) and Article 9(d), where processing is necessary for the protection of your legitimate interests or the legitimate interests of a third party, in order to understand, deliver and improve the service you receive from Inspire North.  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  Support Needs | To assess eligibility for service and identify support needs | | Demographic Data:  Gender  Religion  Ethnicity  Address  Sexual Orientation  Pregnancy  Ex-armed forces  Criminal Convictions | To monitor the access, effectiveness and outcomes of our services to diverse communities and to ensure we can work effectively with individual need | | Housing Data:  Landlord  Previous accommodation inc. Prison  Access Requirements  Tenancy Type  Arrears  Dependent in household and if a child the age | To understand Previous history, identify any homeless/arrears issues | | Disability Data:  Disability Type  Communication Support and Language | To ensure our services are accessible (see demographic data above | | Mental Health Data | To assess for service eligibility, identify support needs and risk management tools | | GP data:  Registered with  Name and Address | To ensure registered and to enable effective communication with Primary care e.g. in crisis situations | | Next of Kin Data:  Contact details and if live with client | To ensure we can contact someone in an emergency. Identify relatives and carers as part of support network | | Service Data (work carried out within the service in case notes, support plans etc.)  Category of support  Close reason/Eviction | To document the work our services do | | Financial Data:  In employment  Receipt of benefits/type  In education  National Insurance Number | To document the work our services do and ensure client is receiving full benefit or other financial support/entitlement | | Risk Data:  Classification  Risk Alert Personal Data | Assess Risk and ensure a robust management plan is in place | | Client Case Notes | To record work with clients | | Medical Data (Covid vaccination data)  Drug and Alcohol scripts  Medications | To asses risk.  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 information 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).  **Information we receive from other sources**  We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).  **Automated Decision Making and Profiling**  We may analyse your personal information 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 or to assist in delivering our [client charter](http://www.inspirenorth.co.uk/wp-content/uploads/2021/04/InspireNorth_Client_Charter_Poster_A3_Feb21_web_email.pdf).  Any personal information 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.  **Disclosing your information**   * Your personal data is information which identifies and relates to you including your contact details and photographic image and includes information we obtain directly from you or from third parties. * 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**  To find out how to manage your contact preferences and consent please read the specific subject and services section below. | |
| **Non-EEA Data Transfer**  Inspire North operates within the UK.  Information we process is hosted and stored within the European Economic Area (EEA).  Your data will not be transferred outside of the EEA. | |
| **Summary of the Data Subject’s Rights**   * You have a right to request a copy of any personal data we hold about you by making a Subject Access Request. Any request must be made in writing to the address below and include the following information:   + full name – including any previous/other names used   + date of birth   + full address   + telephone number   + any unique registration or ID numbers used with the organisation * You have the right to amend or withdraw any consents you have provided at any time. This will include marketing consents. Should you wish to do this, please contact Inspire North at the address below or alternatively at **informationgovernance@inspirenorth.co.uk** * If you have any objections in relation to the processing of your personal data by Inspire North, you have the right to lodge a complaint with Inspire North or the Information Commissioner’s Office or with any other relevant supervisory authority. * You have the right to request from access to and rectification of any inaccurate or incomplete personal data held by Inspire North. * You have the right to request that Inspire North (and anyone processing your personal data on Inspire North’s behalf) erases your personal data from Inspire North’s systems and files. (note – there may be occasions in which this is not possible but in such circumstances you will be advised appropriately) * You have the right to request that Inspire North provides to you, or a third party nominated by you, a copy of all personal data held by Inspire North about you in a data portable format.   The address to use for any matter relating to your data protection rights in relation to the Data Protection Act and GDPR is:  Information Governance  3 Limewood Way Leeds West Yorkshire LS14 1AB | |
| **Information Security and Privacy**  We are committed to protecting your personal information. We use appropriate technical and organisational measures, including encryption, to protect your personal information and privacy, and review these regularly. We protect your personal information using a combination of physical and IT security controls, including access controls that restrict and manage the way in which your personal information and data is processed, managed and handled. We also ensure that our staff are adequately trained in protecting your personal information. Our procedures mean that we may occasionally request proof of identity before we share your personal information with you.  In the unlikely event that we do suffer a security breach which compromises our protection of your personal information and we need to let you know about it, we will do so.  Third-party websites you access through links on our websites will have their own privacy policies. We do not accept any responsibility or liability for these policies. | |
| **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 information that we already have about you without your consent.  This privacy policy was last reviewed and updated in February 2023. | |

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| **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](mailto: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 (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 The Inspire North Group:   * Foundation Services * Community Links Services * Other organisations that come in to the Inspire North group   For organisations who work in a consortia arrangement with an Inspire North Company, 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 titles “Summary of the data subject’s rights”. |
| **Cookies** |
| **What are cookies?**  When you visit these 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 [http://www.aboutcookies.org/](http://www.allaboutcookies.org/) ) 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 information 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 General Data Protection Regulation (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 Group site visits is accessible by the Group 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 Group 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 titles “Summary of the data subject’s rights”. |
| **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 Twitter), 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: [informationgovernance@inspirenorth.co.uk](mailto:informationgovernance@inspirenorth.co.uk)  **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 General Data Protection Regulation (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 titles “Summary of the data subject’s 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](mailto: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 General Data Protection Regulation (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 titles “Summary of the data subject’s 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 (IN Net). 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: [**informationgovernance@inspirenorth.co.uk**](mailto:informationgovernance@inspirenorth.co.uk)  **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 relation 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 IN-Net system and are providing you with a service will have access to your data. These will only ever be services that form part of The Inspire North Group:   * Foundation Services * Community Links Services * Other organisations that come in to the Inspire North group   For organisations who work in a consortia arrangement with an Inspire North Company, 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.    IN Net is a one client record therefore if you access multiple services within the Inspire North Group 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 or 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 within the Inspire North Group?**  We will be unable to provide you with a service if you decline to have your data stored within the IN-Net system.  **What if I am being re-referred within the Inspire North Group?**  As your record is a ‘one client record’, and the time between leaving the service and being re-referred is within Inspire North’s Data Retention and Destruction schedules, your data will still be on IN Net 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 titles “Summary of the data subject’s rights”. |
| **Media** |
| **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](mailto:communications@inspirenorth.co.uk).  **How we use your information for research**  Images, video or written personal details you supply to the Inspire North Group 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 Development and Innovation Directorate at the Inspire North Group 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 Group 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 and the Development and Innovation Directorate.  **What information is processed?**  Data you supply for use in the Inspire North Group’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 titles “Summary of the data subject’s rights”. |