

## **COMPLAINTS PRIVACY NOTICE**

This privacy notice is designed to help you understand how and why Northamptonshire Partnership Homes (NPH) processes your personal data. This notice should be read in conjunction with our Corporate Privacy Statement ([Link](#))

### **Who are we?**

NPH is a 'data controller' as defined by Article 4(7) of the UK General Data Protection Regulation (UK GDPR). NPH is registered with the Information Commissioner's Office as a Data Controller (Reference ZA092170) and we are the data controller for the purposes of managing personal data associated with complaint lodged with us. We are legally required to operate a complaints process; this notice informs you of how and why your personal data is processed as part of this.

### **What personal information do we collect?**

If you make a complaint to NPH, or if you are a direct or indirect party to a complaint, we will collect and use your personal data in order to investigate the complaint. This may include, but is not limited to:

- any relevant information we hold on our systems and databases
- any information you, or a party to the complaint, provides us with
- any information passed to us by any other organisation
- witness statements
- any relevant correspondence we have had with you or another party to the complaint –including internal correspondence about you
- any relevant video recording (including CCTV), audio recordings including call recordings, or images
- investigation interview notes

### **Why do we collect your personal information?**

We collect and process your personal information in order to administer and investigate complaints made to NPH

### **What is our lawful basis for processing your information?**

NPH relies on the following lawful basis to process your personal data:

- UK GDPR Article 6 (1) (c) - processing is necessary for compliance with a legal obligation to which the controller is subject
- UK GDPR Article 6 (1) (e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

## **Who do we obtain your information from?**

Much of the information we process will be obtained directly from your complaint or from a complaint made by another individual. However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- the police and/or other law enforcement bodies
- West Northampton Council
- local health and/or social care providers
- housing ombudsman

We may also receive your information via a councillor and/or member of parliament (MP) if you have nominated one to make your complaint on your behalf.

## **Who do we share this information with?**

Within NPH we will disclose any relevant information to any officer that requires the information in order to complete the investigation, to administer the complaint, or to receive advice about how to handle a complaint.

The following organisations may also receive your information if required by law:

- housing ombudsman
- parliamentary and health services ombudsman
- information commissioner's office
- local health and/or social care providers
- any other organisation and/or regulator when we are legally required to disclose your information

## **How long do we keep your information for?**

Information is retained in accordance with the provisions of the Data Retention and Destruction Policy.

Generally, information relating to complaints are kept for Six years following closure of the case.

For more information about how we use and protect your data, your privacy rights and the complaints process, please see our Corporate Privacy Statement ([link](#)) or contact the Data Protection team on [dataprotectionNPH@nph.org.uk](mailto:dataprotectionNPH@nph.org.uk) or on 0300 330 7003. You can also write to the DPO by post at Northamptonshire Partnership Homes, One Angel Square, Angel Street, Northampton, NN1 1DE.