



NORTHAMPTONSHIRE
PARTNERSHIP HOMES

Independent and SQC Committee members Privacy Notice

This privacy notice explains what personal information we may hold about you as an independent Member of a Northamptonshire Partnership Homes (NPH) committee including the Service Quality Committee (SQC) and how we collect this information, the reasons and lawful basis for doing so, how we use the information, how long the data will be kept and the arrangements that are in place to ensure its security. The processing of personal data is governed by the Data Protection Act 2018 (DPA2018) and 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 the personal data associated with your role with us as a Board Member.

What information does the organisation collect?

Personal Information is defined in the UK GDPR. It is any information which can be used to identify a living individual either directly or indirectly. It therefore includes for example, name, address, online profiles, cookie identifiers, and other identifiable information.

Special Category Data – is personal data which is considered to be sensitive and therefore requires specific protection. The categories of special category data are:

- race or ethnic origin
- political views and affiliations
- religious or philosophical beliefs
- trade union membership
- genetics
- biometrics (where used for ID purposes, for example, facial recognition)
- health

To manage the SQC Member role, we may also retain the following data about you:

- Your bank details and national insurance number
- Details of other Non-Executive positions you hold
- Details of potential or actual conflicts of interest in relation to your role.

- Additional details you may have disclosed, which could include details of your qualifications, skills, experience, identification documents and employment history
- Welcome letter which set out the terms and conditions relating to your appointment.
- Contact details for you and your next of kin
- Information about your remuneration

Legal basis for processing the information

The processing of this data is necessary for us to perform a task in the public interest and to fulfil our official functions.

We have a duty under the Social Housing Regulatory Framework to involve and empower tenants and involve them in the regulation of our services.

Why we collect and use this information

NPH will collect and use this personal information to comply with governance requirements and to provide support services to facilitate committee members in carrying out the roles and responsibilities set out in the Terms of Reference.

How the information is collected

We collect this information in a variety of ways, such as from information supplied by you in application forms, CVs or resumes; obtained from identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, it may be necessary to collect personal data about you, with your approval, from third parties.

Who has access to your data?

The information you provide to us will be treated as confidential.

Your information may be shared internally, including with the Chair, other committee Members (contact details only), Executive Directors, the Governance and Corporate Support Team, Finance Team, Human Resources Team and IT/Digital staff if access to

the data is necessary for performance of their roles. Where required NPH's Data Protection Officer may also have access to your data, e.g. for processing subject access request or investigation of any potential data breaches.

We may need to share your data with third parties to obtain references from referees and obtain necessary criminal records checks from the Disclosure and Barring Service.

The organisation may also share your data with third parties in the context of complying with regulation and/or legislation and/or contract agreements. In those circumstances the data will be subject to confidentiality arrangements.

The organisation also shares your data with third parties that process data on its behalf, in connection with payroll, expenses claims, insurance providers and external benchmarking through individual surveys.

The organisation will not transfer your data internationally.

How does the organisation protect data?

We take the security of your data seriously. Internal policies and controls are in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. We already have in place, under the current law, various safeguards, including password protecting all data accessed in any electronic form, and holding all data on secure servers which are either located on-site, or securely held within Microsoft's cloud servers. We also undergo regular audits in this area, to help us keep improving how we manage data, and to learn from best practice developed and used by other organisations.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the organisation keep data?

We will hold personal data in the documents both provided and signed when you became a committee member for six years following the end of your term of service.

Your rights

- **Right of access.** The GDPR gives you the right to access copies of the personal data held about you. Your right of access can be exercised in accordance with the GDPR.

- **Right to request an electronic copy of your personal data.** Where you provide personal data you have the right to be provided with a structured, commonly used and machine-readable copy and have the right, in certain circumstances, to ensure that we transmit that personal data to a recipient of your choice without hindrance (the right to data portability).
- **Right to correct.** You have the right to ensure that we correct the records of any personal data held about you which are inaccurate. You also have the right to ensure that we complete any incomplete personal data held about you.
- **Right to erasure.** You have the right to ensure that we erase your personal data, though we would need to retain limited details to comply with the Companies Act 2006, (the right to be forgotten).
- **Right to restriction.** In certain circumstances, such as where you have contested the accuracy of personal data, you have the right to restrict our processing of your personal data. That means that we will hold your personal data on file but that we cannot process that personal data. We will inform you if for any reason the restriction on processing your personal data is lifted.

Where any rectification or erasure of personal data or restriction of processing has taken place, we shall communicate any rectification to you or erasure or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall, if you request, inform you about those recipients.

Exercising your rights. If you wish to exercise any of your rights, or if at any point you believe the personal data, we process is incorrect, you can request to see this personal data. If you would like a copy of the personal data about you that we process, or if you wish to have that personal data transferred to another company or organisation, please contact our Data Protection Team Leader dataprotectionNPH@nph.org.uk or at One Angel Square, Angel Street, Northampton, NN1 1DE.

If you have any concerns about our use of your personal information, you can lodge a complaint on dataprotectionNPH@nph.org.uk.

You can also complain to the ICO if you are not satisfied with the way NPH has processed your personal data. The ICO's contact details are:

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

Helpline number 0303 123 1113

Or by using <https://ico.org.uk/concerns/>

If you have any queries relating to anything in the letter, please feel free to contact us at governance.nph@nph.org.uk.