

Explaining your information rights at **Clearing House**

Your rights

St Mungo's recognises your rights to data including:

- **The Right of Access to personal data** - You are able to request all information which St Mungo's holds on you. This will include what information we hold, why we hold it and if we are sharing it. You can do this by contacting your service manager, or contact our Information Security team directly using the details below.
- **The Right to be Informed** – St Mungo's will help you understand any complex terms or codes on your record by providing explanations where needed. We would encourage you to ask questions to help you understand your record including why we hold types of information and what we use it for. We will also let you know if we do not hold some information you have requested.
- **The Right to Accuracy** – If you see something on your record you believe is inaccurate you can request we amend it. St Mungo's will need to demonstrate they have checked the information and ensure accuracy is maintained to the best of our knowledge.
- **The Right to Erasure/Restriction** – You can ask St Mungo's to remove information or to stop using some of your information. We will consider your request against the purpose and legal basis for holding your data. There may be some cases where we cannot remove data, or where erasing it would prevent us being able to continue working with you. In these cases we will explain the reasons clearly and advise you on the options available to you.

Being clear about you and your information at **Clearing House**

We collect personal and sensitive information from you to ensure we are able to provide you with the most appropriate and tailored support. We will also use this information to allocate you an appropriate property.

What is collected will vary between services and projects so you may have some information which is used for different reasons. This document will explain those reasons, and should answer any other questions.

If you have any questions about how your information is used you can ask your service manager, keyworker or contact Information Security at St Mungo's using the details below. We will be more than happy to help and answer any questions you may have.

Your Personal Information

We ask you for your name, date of birth, citizenship and economic status and identification numbers (NI, CHAIN number).

This information is collected to confirm your identity and better understand which services and benefits you are able to access. We also use this to ensure we are delivering a fair and inclusive service.

We also collect more general information about you to better understand the sort of support you might need. This could include whether you're a parent, your education history, and boroughs or cities you have a local connection with, including your housing history for the past five years.

We use this extra information to help us provide targeted support to you around the areas which are most important to you in fulfilling your hopes and ambitions.

Your Sensitive Information

- **Racial or ethnic origin and religious or philosophical beliefs**
Recorded to assess your entitlements and eligibility to specialised support services, benefits and public funds. This information will never be used to discriminate against you. It may also be used for reporting on our services, but this would be done anonymously. We also use this to ensure we are delivering a fair and inclusive service.
- **Mental and physical health diagnoses and well-being**
We initially receive this information in referrals. This is used to assess accommodation and plan appropriate support before your arrival. This could involve contacting and sharing information with relevant agencies already working with you. We will also do this if we believe there may be undiagnosed conditions.
- **Details of drug and alcohol use, support and any related incidents**
This information is used to understand whether or not there are any support needs we should be aware of to provide the right support and to minimise risk or harm to yourself and others. It is also used to assess any patterns of behaviour to help provide better support.
- **If you are a victim or have support needs around domestic violence**
We record this information to make sure we can support any needs you may have.
- **Sexual behaviour and orientation**
This information is used particularly to provide harm minimisation and support. We also use this to ensure we are delivering a fair and inclusive service.
- **Information about offending history and behaviour**
We may receive information in your referral form, or if you are currently supervised by a specialist agency such as Jigsaw or MAPPA, from your referral agency. Only the relevant risk information will be stored.
These checks are done to keep everyone safe including yourself, other clients and staff. This information will not be used to discriminate against you, and we will never share these details externally without your clear and explicit consent.

We collect this information for six main reasons:

- 1) To identify any specific support or services you might be eligible for
- 2) To appropriately allocate you a property
- 3) To ensure we are providing you with a fair and inclusive service
- 4) To manage any risk to yourself, other clients, staff, the public and the environment appropriately
- 5) To evidence that we are delivering on our contracts with those who commission and fund our projects and services
- 6) To assess our own performance and provisions of services so that we can continuously improve

Where we are using the last two reasons, we will make sure to minimise your personal information so that the information cannot reasonably be linked back to you.

In exceptional circumstances, for example, if we have safeguarding concerns, we may also have to use your information to effectively manage any risks to vulnerable adults and/or children.

During your tenancy, the Tenancy Sustainment Team (TST) will request proof of your employment, if you are in work and proof of your new address at the end of your tenancy. These documents will be shared with, and stored by, Clearing House.

We collect this information for two main reasons:

- 1) To evidence that we are delivering on our contracts with those who commission and fund our projects and services
- 2) To assess our own performance and provisions of services so that we can continuously improve

What are our legal reasons for processing your information?

Clearing House does not collect all of your information using consent. This is because there is some information we need to process so that you can access the service and be assessed, and appropriately allocated to property with the Clearing House.

We process information under four legal bases:

- 1) We collect the majority of your personal and sensitive information under the legal basis of **(Substantial) Public Interest**. We will only use this information for the purposes as stated above. If you have concerns about your data, we promise to listen and support you around these.
- 2) **Legitimate Interest**. For example, this may include your parental or grandparental status, details about previous accommodation, and your phone number. If you are not happy for us to store this information, we are able to remove it at any time.
- 3) Sometimes we need to process information to protect **Vital Interests**. This means we may have to share, collect or otherwise use your information to protect the life of yourself or others.
- 4) **Consent**. Where we can offer you genuine and meaningful consent, we will of course do this. This means when we ask if you are happy for us to process your information we will only do so in a way which you agree to. If you do not consent, we will not use, share or process your information for that purpose.

Sharing your information

We have to share information between ourselves and other agencies to provide combined support. There are some agencies which we work more closely with, below is a list of these agencies, grouped according to why we would share your information.

The Tenancy Sustainment Team (TST)

When nominated to a property, the Tenancy Sustainment Team working in the area will be provided with a copy of your referral. This will be used to ensure you can be given the appropriate level of support to maintain your tenancy.

Your prospective landlord, when you are nominated to a property

When nominated to a property, the Registered Provider of Social Housing will be provided with a copy of your referral. This will be used to assess your suitability for the property and ensure you are given appropriate support.

A full list of the Registered Social Landlords you could be nominated to can be found on our website: <https://www.mungos.org/our-services/clearing-house/>

The Greater London Authority (GLA)

The GLA commissions Clearing House and in exceptional circumstances we may share personal information with them to evidence that we are delivering on our contracts and in incident reporting.

How long will we keep your data?

Proof of your employment and new tenancy should you leave the service, will be stored for **one year**.

We will keep all your other data for a period of **seven years**, after you have left the service. Your data will then be minimised and only the following information will be kept:

- Your name, CHAIN number and date of birth to identify you should you reapply to Clearing House in the future.
- A record of your tenancy including dates of entry and exit, again this would be able to help us better support you should you re-engage.

In some exceptional cases we may have to keep additional information. This will only be done if there were any significant risks to yourself, other clients, staff, the public and the environment which we'd need a record of, should you re-engage.

Queries and complaints

For any queries or complaints regarding the use of your data please contact any of the below who will be able to assist you.

St Mungo's

Service manager

Alex Laybourn
Manager, Clearing House
Alex.laybourn@mungos.org
020 3856 6106

Information Security Team

Data Protection Officer

InfoSec@mungos.org

Tel: 020 3856 6121

Write: Information Security, St Mungo's, 3 Thomas More Square, Tower Hill, London, E1W 1YW

Complaints

complaints@mungos.org

Tel: 020 3856 6068

Write: Quality team, St Mungo's, 3 Thomas More Square, Tower Hill, London E1W 1YW.

Please note - we are unable to see personal callers at this address

If you are not happy with the response you receive from St Mungo's, you can contact the UK representative for data protection.

The Information Commissioner's Office

www.ico.org.uk

0303 123 1113

By signing below, you agree for your worker to enter information about you onto the Clearing House system for the purposes detailed above. You also agree that the information that you have provided to them is complete and accurate.

I _____ [print name] agree to provide complete and accurate information for the purpose of completing the Clearing House referral form, and for Clearing House and other RSI partners using my information as detailed above.

I also understand and agree to the following:

- *If accepted onto the service I will receive a renewable 2 year fixed term AST*
- *I will engage with offered TST support for the duration of my tenancy*
- *Once I no longer need TST support I will be expected to move to independent accommodation*

Signed: _____

Date: _____

The original copy of this signed form should be held on file by the referring organisation. One hard copy should be provided to the client. One electronic copy should be made and attached to the Clearing House online referral form.

Please also see the following documents:

- Data Protection & Information Sharing policy
- Clearing House User Agreement

Contact and further information:

St Mungo's

ch@mungos.org

020 3856 6008