****

**PRIVACY NOTICE FOR PETRA CLIENTS**

This Privacy Notice explains the types of personal data we may collect about you, how we will use that data and how we will keep it safe. This notice relates to current and previous Petra Clients as well as individuals who have applied for a place at a Petra house. Feel free to contact us at petra.manager@mercyinaction.org.uk with any questions.

**WHAT PERSONAL INFORMATION DO WE COLLECT?**

Personal data is any information that identifies and relates to a living person – including information that when put together with other information can then identify a person. The information that we process about you depends on our relationship with you. We may collect the following data:

* Contact details – name, address, email address, telephone numbers
* Age/Date of Birth
* Identification information – such as your National Insurance Number
* Information about your financial circumstances - such as income, benefits, employment and other financial details
* Information about your housing circumstances
* Information about your support and wellbeing needs – such as medical conditions, disabilities, vulnerabilities and support needs relevant to your housing and support from Petra
* Information about other members of your family who will be living with you
* Photographs
* Information about criminal convictions
* Information regarding your tenancy, including complaints made about you or your visitors
* Information about your interests and skills

**HOW DO WE COLLECT YOUR PERSONAL INFORMATION**

We collect information about you:

* **When you give it to us directly.** For example, when you fill in forms or provide information during your stay with us.
* **From third parties.** We may also receive information about you from other services that support you, such as social workers and health professionals.
* **During your stay with us.** We collect information through our ongoing contact and provision of support to you.

**HOW DO WE USE PERSONAL INFORMATION?**

We mainly use your personal information to enable us to process your application, manage your tenancy and provide our support services to you, this includes:

* Processing applications for housing and services
* Managing the allocation of places at Petra Houses
* Communicating with you about your application or tenancy
* Confirming your identity and the identity of other members of your household
* Managing the tenancy, such as processing rental fees, investigating complaints, ensure tenancy conditions are being adhered to
* Safeguarding those living and working within Petra houses
* Providing information and advice relating to education, employment and training opportunities
* Providing advice and support with improving your financial situation, such as support with benefit claims and applying for grants
* Making referrals to other organisations who can provide specialist advice to support you – only with your consent.
* Engaging with you to get feedback about the service and how we can make improvements
* For our own administration purposes and to keep a record of your relationship with us
* To comply with applicable laws and regulations
* Promoting MiA and the Petra Project

If you do not provide your personal information, we may not be able to offer you a place at a Petra House or it may impact our ability to provide some services to you.

**ON WHAT BASIS DO WE COLLECT, STORE AND USE YOUR INFORMATION?**

We will only process personal information about you for the relevant purposes (when the law permits us to). We usually process your personal information when:

* It is necessary to fulfil or enter into a contract with you, for example when you have a tenancy agreement with us.
* It is necessary to comply with a legal or regulatory obligation.
* You have given us your consent.
* Where we rely on ‘legitimate interests’ for processing your personal information.

We consider it within our, and our clients/staff, legitimate interests to assess new applications to determine whether we have a suitable place and can offer adequate support. We also consider it a legitimate interest to safeguard all staff and residents of Petra Houses, and achieving our purpose of carrying out our charitable objectives.

**WHAT ABOUT YOUR SENSITIVE DATA?**

Some personal information is more sensitive this includes information about your health, ethnic origin, religious beliefs, political opinions, sexual orientation, genetic data, biometric data, and criminal offence data.

When you use our services we may collect some sensitive information, where there is a clear and valid reason for doing so. For example, if you are a Petra Client, we process health and wellbeing information relevant to your housing and support needs so that we can ensure placements are suitable for you and to provide you with/signpost you to support.

The conditions that we rely upon to process Special Category and Criminal Offence Data are:

* Your explicit consent
* Our legitimate activities as a charity
* For reasons of Substantial Public Interest
* For the establishment, exercise or defence of legal claims

In some rarer circumstances, we may process personal data where it is necessary to protect your, or another person’s, vital interests – for example, if there was an life threatening situation and we needed to provide your name and location to the emergency services.

**CHILDRENS INFORMATION**

We ask for children’s basic information if they’re residents in one of our houses, including their name and age to ensure that a property isn’t overcrowded and to assist us in ensuring that we offer relevant advice.

We may also process children’s information if we are involved in housing and support aspects of a multi-agency working solution.

**KEEPING YOUR PERSONAL INFORMATION SAFE**

Your information is stored securely on the Mercy in Action secure storage systems, which are located in the UK. Your personal information will not be transferred outside of the UK/EU without your consent.

We have implemented appropriate physical, technical, and organisational measures to protect the personal information that we process from improper access, use, alteration, destruction, and loss.

We only store data as long as it is reasonable and necessary for the relevant activity. Our time periods take into account operational and legal considerations. Usually, we will keep your information for no longer than 7 years after the end of our relationship with you.

**DO WE PROVIDE INFORMATION TO OTHER PARTIES?**

Your personal data may be shared in order to achieve the purposes set out in this notice, including:

* With service providers who provide services on our behalf for the purposes described in this privacy notice, such as external service providers that assist us with data hosting, payment processing and maintenance services. In these instances, we always ensure that we instruct them, under contract, on their use and treatment of the personal data we share with them.
* With third parties directly involved in your support, for example health visitors, social workers, local authority housing teams (we will ask you as a client/potential client whether you consent to us sharing your information)
* Information will be shared with third parties if we believe someone is at risk. We will usually ask for consent to do so unless it’s not felt safe to do so.
* where we are required, or permitted, by law to do so, for example to law enforcement or regulatory bodies
* where we believe it is necessary to protect or defend our rights, property or the personal safety of our staff, Petra residents or visitors to our premises
* where it is necessary to safeguard children or individuals at risk

If we discuss with you a referral to another organisation for support, we will ask your consent before sharing your information.

**YOUR RIGHTS**

You have various rights in respect of the personal information we hold about you.

You have the right to:

* **Ask us for copies** of your personal information.
* **Ask us to correct** any personal information you think is inaccurate, including asking us to complete information you think is incomplete.
* Ask us to **delete** your information where it is no longer necessary for us to use it, or you have withdrawn consent, or where we have no lawful basis for keeping it.
* Ask us to **restrict the processing** of your personal information in certain circumstances, e.g., if you think the information that we hold is inaccurate.
* Ask us to provide you or a third party with your personal information in a structured, commonly used form – this is known as your right to **data portability**.
* **Object** to our processing of your personal information where we are relying on a legitimate interest or processing your information for direct marketing purposes.

**CONTACT DETAILS**

Petra is a project run by Mercy in Action (MiA). Mercy in Action are a UK based charity taking action against poverty, injustice and inequality to see children and families thrive.  ‘We’ or ‘us’ refers to:

* Mercy in Action, a registered charity (no. 1096068) and company limited by Guarantee (no. 04627969).
* Mercy in Action Trading Ltd, a registered company in England and Wales (no. 11025273)

If you wish to exercise any of your rights or make a complaint, you can do so by contacting our Data Protection team at Mercy in Action, 11 Foxcote Avenue, Peasedown St. John, Bath, BA2 8SF or by email at: enquiries@mercyinaction.org.uk.

If you feel unhappy with our usage of your personal information you also have the right to complain to the Information Commissioner’s Office. You can contact them on 0303 123 1113 or via their website [www.ico.org.uk](http://www.ico.org.uk).

NB: This policy will be reviewed annually and may be subject to change. If we make any material changes to the manner in which we process and use your personal data, we will contact you to let you know about the change.