CASTLE ROCK EDINVAR
HOUSING ASSOCIATION

Part of
Places for People

Customer Experience Directorate

Use of Community Space at
3 Hay Avenue, Edinburgh, EH16 4QR

# Proposal Paper

# Contents

# Distribution

This proposal document is available to download from the Castle Rock Edinvar website for the duration of the consultation period

**www.castlerockedinvar.co.uk**

A link is provided on the local Community Facebook page

**www.facebook.com/CRECraigmillar**

A link to a downloadable version of this document will be provided to:

- All Castle Rock Edinvar staff
- Board Members of Castle Rock Edinvar
- All customers of Castle Rock Edinvar within postcode area EH16 4 and EH15 3 (see appendix 1 for map of area)
- Craigmillar Community Council
- Community organisations and agencies
- Local Elected Members
- Potential wider community users of the proposed community space

A hard copy of this document is also available during the consultation period from:

- Reception, Castle Rock Edinvar, 1 Hay Avenue, Edinburgh, EH16 4RW

Where possible, this document will be made available in alternative formats or in translated form for readers whose first language is not English.

# Summary of process for this proposal document

## 1. Consideration by the Director of Customer Experience

This proposal document has been issued as a result of a decision taken by the Director of Customer Experience. This is to seek views on the proposal in this paper.

## 2. Proposal document Issued to consultees

It will be promoted through the Castle Rock Edinvar local Community Facebook page and published on the Castle Rock Edinvar website. We will also email or text a link where possible to the consultees listed on the preceding page.

## 3. Advertising

Advertisements will be placed in relevant spaces within the community.

## 4. Length of consultation process

The consultation will run from 25 November 2019 until close of business 19 January 2020.

## 5. Public meetings

Two public meetings will be held, the details of which are given on page 11 of this document.

## 6. Focus groups, drop-in sessions and other events

A number of focus group meetings, open-door 1-1 drop-in sessions and other events will be held. Details are listed on page 11 of this document.

## 7. Preparation of consultation report

The senior management team will review the proposal taking in to account the evidence gathered, at all the different consultation events held.

A consultation report will then be prepared. The report will be published in electronic and printed formats and will be publicised on the Castle Rock local Community Facebook page, downloadable from the Castle Rock Edinvar website and from the reception desk at Castle Rock Edinvar, Hay Avenue, Edinburgh, free of charge.

Anyone who made written representations to Castle Rock Edinvar during the consultation period will also be informed about the report.

The report will include:

A record of the total number of written representations made to Castle Rock Edinvar during the consultation period:

- A summary of any written representations
- A summary of the oral representations made at the public meetings
- A summary of individual questions asked by consultees during the consultation (both written and oral)
- A summary of responses given by Castle Rock Edinvar to the above

## 8. Decision

This report, together with any other relevant documentation, will be considered by the Castle Rock Edinvar senior Management Team, who will come to a decision about how to implement the proposal.

## 9. Note on corrections

If any inaccuracy or omission is discovered in this proposal document, either by Castle Rock Edinvar or any person, Castle Rock Edinvar will investigate and decide what, if any, action is required.

## Public meetings

Two public meetings will be held to discuss the proposal. Anyone wishing to attend a public meeting is invited to do so. The meetings, which will be convened by Castle Rock Edinvar will be addressed by relevant CRE staff.

The meetings will be an opportunity for interested parties to:

- Hear more about the proposal
- Ask questions about the proposal
- Have their views recorded so that they can be taken into account as part of the consultation process.

## Drop-ins

Two open-door, drop-in events will be offered. These will give anyone interested an opportunity to voice their opinions on the proposal in a 1-1 setting.

## Focus groups

A number of focus group meetings will take place. Each group will comprise of up to ten people and will target:

- A broad cross-section of Castle Rock Edinvar staff
- Castle Rock Edinvar Customers
- Members from all sections of the local community including young people, mature people, representatives of organisations and business people.

Notes will be taken at all the above events of questions and views. These notes will be published as an appendix in the consultation report. No details of any respondent will be included in any subsequent reporting of evidence.

## Other events

Other arts/cultural events are planned during the consultation period and we will endeavour to use these an opportunity to further consult with the community.

Refreshments will be available at all of the above events.

# Castle Rock Edinvar

## Customer Experience Directorate

**Context:**
Our mission is to be Scotland's leading Placemaking partner, creating places which work for everyone. Our mission is underpinned by five strategic pillars that drive our actions and results: placemaking, innovating, partnering, investing and wellbeing.

Castle Rock Edinvar (CRE) owns in excess of 600 properties in the Greater Craigmillar area of Edinburgh. The organisation's headquarters is situated in Craigmillar, and we have worked in the area for nearly 20 years.

**The proposal:**
That, subject to the outcome of this proposal:

Additional accommodation has become available recently in the Castle Rock Edinvar premises at 3 Hay Avenue and will be re-purposed into a space which can be used by members of the public and community groups in Craigmillar and beyond.

## 1. Reasons for formulating the proposal

By placing the customer at the centre, we aim to work with partners to provide suitable housing, build relationships and support the diverse communities in which we work. We strive to maximise our social impact through the delivery of services to our customers.

To realise this, Castle Rock Edinvar seeks to invest both physical and social capital in its communities. It also wishes to continue to develop closer relationships with its customers and their communities. Developing this community space will provide opportunities for both community learning and social development. We are not seeking to replace opportunities provided currently by other agencies and organisations but to complement and enhance existing provision.

We believe that it is essential to seek the views of relevant stakeholders to ensure that this offer to the local Community is both relevant and aspirational, including:

- how this community space will be used
- who is the community that will use it
- the physical design of the space.

## 2. Potential use of the community space

We envisage the community space being accessed by anyone who wishes to use it. It can be used as a meeting place, a space for groups to work and learn, an exhibition area and a music performance venue. The use of the space is limited only by the imagination of the surrounding community. We envisage that there will be a mixed range of resources available, tailored to the needs of the community.

We do not intend use of the space to be determined or driven by any one sector or external agenda (e.g. health or education). Rather, we envisage a welcoming, fully-inclusive space where people can just be.

We would look to support, promote and encourage the delivery of specific projects within the premises, relevant to the community:

- We have already raised funds to deliver a 6-month pilot project in group music-making intended for both adults and young people. This initiative was prompted in part by a positive response from Castlebrae High School staff and pupils to the proposal.
- We are in discussion with City of Edinburgh Council about hosting adult literacy and digital literacy classes in partnership with local charity, People Know How.

## 3. Community impact

From conversations, it is clear that although we have a physical presence in the community, we could play a far larger role in the lives of customers and those of the surrounding community; there is great potential to create more instances of positive interaction. We have learned that clear gaps exist in terms of cultural provision and that participatory arts activities are lacking in the area. There is very little to enable social activity in the evening.

We recognise that there has been, at various points in the past, a wide variety of arts, cultural, recreational and health-driven interventions in the area although we are now seeing funding dry up as regeneration work nears completion.

## 4. Partner agencies and local organisations

We currently work with a wide range of partners in many different ways. Specific partners are to be confirmed.

Among the partners we plan to consult include:

- City of Edinburgh Council
- Police
- NHS
- Craigmillar Community Council
- The Neighbourhood Alliance
- Community Alliance Trust/The White House
- Sandy's Community Centre MC
- Care in Craigmillar
- Thistle Foundation
- The Mission Café
- Connecting Craigmillar
- Craigmillar Community Grows
- Richmond Craigmillar Church
- Lyra
- Drake Music Scotland
- Castlebrae Community High School
- Castleview Primary School
- Niddrie Mill Primary School
- St Francis RC Primary School
- St Teresa's RC Church
- Craigmillar Arts
- Kids in the Street
- Craigmillar Literary Trust
- Health Opportunities
- Community Renewal
- Hay Drive Post Office & Convenience Store
- Haystax Nursery

## 5. Financial Implications

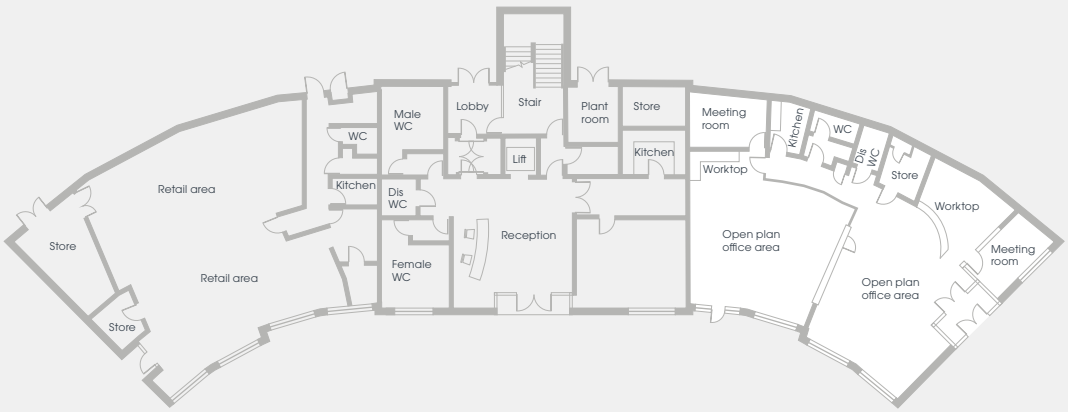
The costs of the venue and staff are being met by Castle Rock Edinvar. Projects and initiatives will be met by external grants.

# Appendix 1:

## Map showing span of area to be consulted

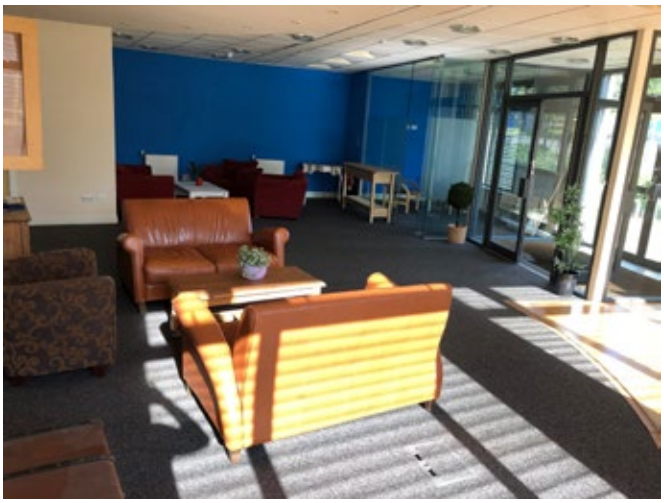
# Appendix 2:

## Floor plan of community space

# Appendix 3:

## Photographs of interior and exterior



# Appendix 4:

## List of public consultation meetings and events

| | | |
|---|---|---|
| 1. | Xmas lights event | Thursday 28 November 2019, 15.30 – 17.30 |
| 2. | Public meeting 1 | Tuesday 3 December 2019, 19.00 – 20.00 |
| 3. | Public meeting 2 | Thursday 5 December 2019, 11.00 – 12.00 |
| 4. | Music/Arts event 1 | Tuesday 10 December 2019, 19.00 – 21.00 |
| 5. | Drop-in event 1 | Thursday 12 December 2019, 14.00 – 15.00 |
| 6. | Drop-in event 2 | Wednesday 8 January 2020, 19.00 – 20.00 |
| 7. | Music/Arts event 2 | Thursday 16 January 2020, 19.00 – 21.00 |

| | |
|---|---|
| 8. | Focus group 1: Cross-section of CRE staff |
| 9. | Focus group 2: Local CRE customers |
| 10. | Focus Group 3: Older Persons' Forum |
| 11. | Focus Group 4: Secondary-age young people |

**All events will be held at 3 Hay Avenue, Edinburgh, EH16 4QR**

# Appendix 5:

## Consultation response form

### The proposal:

That, subject to the outcome of this proposal:

Additional accommodation has become available recently in Castle Rock Edinvar premises at 3 Hay Avenue and will be converted in a space which can be used by members of the public and community groups in Craigmillar and beyond.

Please tick the response which applies to you/your organisation

I **agree** with the proposal outlined in this consultation ☐

I **disagree** with the proposal outlined in this consultation ☐

I would like to make the following comment for consideration:
(If required, please continue on a separate sheet)

Are there any suggestions that you think should have been included?

This part of the form is optional but must be completed for a valid response:

Name .....

Address .....

.....

Your interest: (please tick)

Staff ☐

Member of the community ☐

Other (*please specify) ☐

# Privacy Policy

## How will we use your information?

- We will use the comments you give us as feedback to help inform the way in which the community space will be utilised to benefit the community.
- Your personal information is collected for the purposes of:
  - validating the feedback you give us
  - communicating on matters relating to the consultation process
  - to have further discussions with you around use of the space
  - to ask if you wish to be involved in any ongoing, related activity.
- The consultation report will be published and we may include your feedback, but all personal information linking you to your feedback or the consultation itself will be redacted.

## How will we store your information?

- We will transfer the paper forms into an electronic format and then anonymise and destroy the paper copies
- Once we no longer need your information we will anonymise and destroy the electronic copies too.

## How long will we store your information for?

- We will keep your information for the period of the consultation and then for then two years after the consultation process has ended for as our privacy policy states that personal data must only be processed for the original purpose that it was intended for, as agreed by the individual.

For further information on how Castle Rock Edinvar handles your personal information please refer to our Privacy Policy and Data Retention Policy appended to this document.

# Castle Rock Edinvar privacy notice

**Castle Rock Edinvar Privacy Notice**

Castle Rock Edinvar is committed to protecting your privacy when you use our services.

The Privacy Notice below explains how we use information about you and how we protect your privacy.



## Who are we?

This privacy notice (the "Privacy Notice") applies to all personal information processing activities carried out by Castle Rock Edinvar and its subsidiary, Places for People Scotland.

Castle Rock Edinvar and Places for People Scotland are data controllers in respect of personal information that we process in connection with our business (including the products and services that we provide).

Our principal address is 80 Cheapside, London EC2V 6EE and our contact details can be located at http://www.castlerockedinvar.co.uk/contact_us.aspx

Castle Rock Edinvar is part of Places for People Group. More information about the Places for People Group can be found at https://www.placesforpeople.co.uk and by clicking on 'About Us'.

We respect individuals' rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business.

We may update our Privacy Notice from time to time. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

## Why we collect your personal information?

**Do you know what personal information is?**
Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

**Information we may collect about you may include (but is not limited to):**

Name
Address
Telephone numbers
Email addresses
Data of birth
National insurance number
Bank details
Identification Documents
Income and expenditure
Next of kin details
Health data
Criminal data
Criminal history
CCTV images
Computer IP address

We may also collect personal information from others with whom you live or receive service from us – this may include:

Family and household members
Friends and visitors
Members of public
Representatives
Enquirers

**Did you know that some of your personal information might be classified as 'special'?**

Some information is 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal information relating to your:

Sexuality and sexual health
Religious or philosophical beliefs
Ethnicity
Physical or mental health
Trade union membership
Political opinion
Genetic/biometric data

We will only collect this type of information if it is necessary to your contract so that we can provide the right services to you.

We may at times need to share this information we will only do this if we have your consent or if there are legal requirements for us to do so. We may receive information about you from other data controllers, such as to the police who might

tell us about a crime they are investigating where this impacts on your contract with us or those who live in the same community. If you give us this information about yourself when communicating with us, you do so because you consider it forms part of a legitimate interest for us to hold this information on our records.

If we ask for any sensitive personal data about you, we will always tell you why we need it and ask for your consent to hold it.

## Why do we need your personal information?

We may need to use some information about you to:

- deliver services and support to you;
- manage those services we provide to you;
- service improvement
- prevention/detection of crime/fraud
- help investigate any complaints you have about your services;
- check the quality of services;
- to help with research and planning of new services.

**How the law allows us to use your personal information**

There are a number of legal reasons why we need to collect and use your personal information.

Generally we collect and use personal information for the purposes of where:

- you are entering or have entered into a contract with us
- you, or your legal representative, have given consent
- it is necessary to protect someone in an emergency
- it is required by law
- you have made your information publicly available
- it is necessary for legal cases
- it is necessary for archiving, research, or statistical purposes

## Consent and Your Preferences

We may contact you or send communications to tell you about a service enhancement such as improvements to our online services or to keep you informed on how we are performing. We won't need your consent to communicate with you this way because we have assessed that it forms part of our agreement with you and it is in our legitimate interest or of mutual interest for us to keep you informed and is relevant to your contract with us.

We will provide an unsubscribe option on communications where you have a choice to object. You can also update your communications preferences at any time by logging on to your online account https://my.castlerockedinvar.co.uk or alternatively if you do not want to sign up for an online account but you want to update your preferences, please contact us and tell us which service you are removing your consent so we can deal with your request.

## We only use what we need

Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

If we don't need personal information we'll either keep you anonymous if we already have it for something else or we won't ask you for it. For example in a survey we may not need your contact details so we'll only collect your survey responses.

If we use your personal information for research and analysis, we'll keep you anonymous or use a different name unless you've agreed that your personal information can be used for that research.

We won't sell your personal information to anyone else.

We may share your information with other companies within our group, we will always ask for your consent to do this and you can ask us to stop at any time.

We will always provide an option for updating your marketing preferences on our communications with you.

## Visiting our websites

When you visit one of our websites, we collect standard internet log information for statistical purposes.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
- We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Our websites contain links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

## How we use your telephone number and email address

Text messages and contact via telephone or email provide a direct way to contact and share information with you about the services we can deliver to you. It can also help you receive important messages about your tenancy or which may interest or a help to you such as new online services.

If you provide your telephone number or email address we may keep in contact with you by these methods.

**Operational SMS/text/email messaging and calls**

If you supply us with your telephone or email contact details, we may use them to call or send you operational text messages.

Examples of operational text messages include:

- Confirming a repair and/or a time and date for a repairs contractor to visit
- Confirming a home visit
- Rent Account updates, arrears actions
- Sending a reminder about an appointment
- Asking you to contact a named person or department
- Satisfaction surveys
- Checking that we have the correct contact details for you.

**Sharing your telephone number with third parties**

We may pass your telephone number to third parties so that we can meet our contractual obligations with you. We may also share your telephone numbers if we are required to by law.

We may supply the details to our approved third party contractors who are delivering or performing services on our behalf, and these companies must not use your information for any other purpose. We never share or sell your telephone numbers to telesales/marketing companies.

**Communicating with you**

We may monitor or record calls, emails, text messages or other communications in

accordance with applicable laws for the purposes of improving our service to you.

## Who do we share your information with?

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements there is always an agreement in in place to make sure that the organisation complies with data protection law.

We may enter into partnerships with other organisations such as local authorities and the police. For example, we may join a partnership to help prevent and control anti-social behaviour. In order to protect your information, we will enter into a legally binding data sharing agreement with partner organisations before any sharing takes place. It is not always possible for us to tell you that personal information is being shared, for example when we are working with the police or other agencies to help the investigation or detection of a crime as to do so may prejudice that investigation.

We are likely to share your personal information with the following:

- Property Services and Repairs
  Contractors and third supply chain service providers for the purposes of carrying out property related inspections and repairs. Generally we will only share your name, the property address and your contact details so that they can arrange an appointment with you. In some cases we may also share customer service information with them, for example where you have told us that you need longer to answer your door. We may also need to share information where we have recorded there is a potential risk to operatives or other representatives. We will tell you what we record about you and we have a review process in place.

- Local Authorities
  We will share your personal information with local authorities usually for the purposes of providing services processed by that local authority such as Universal Credit purposes.

  We may also share information with local authorities for the purpose of investigating tenancy fraud or other types of fraud or criminal investigations. You will not have a right be told about this type of sharing because to do so may affect those investigations we will take steps to protect your information and only share what is necessary for those investigations.

- Police
  We may share your personal information with the police for the purposes of preventing or detecting a crime or fraud.

- Safeguarding and Support Agencies
  We may need to share your personal information with support agencies if we suspect that there may be safeguarding concerns about yourself or those who are your dependent(s). We will not tell you about this beforehand, we will take steps to only share that personal information which is necessary for the safeguarding purposes.

- Utility companies and local authorities
  We may need to share your personal information with utility companies [gas, electric, water] and local authorities for the purpose of ensuring utility services and council tax to the property are correctly charged. We may pass on your details after you have left us if there are arrears with a utility or local authority for services received.

- Debt Recovery Agents
  We may share your personal information with debt recovery agents for the purposes of recovering any outstanding charges owed to us.

- Legal Services and Partners
  We may share your personal information with our legal services or solicitors if we are preparing or defending a legal claim.

- Places for People Group companies
  We may share your information with shared service functions within the Places for People Group, such as for the purpose of financial transaction when making payments to us or the Insurance functions if you make a claim. Places for People Group shared services comply with and process personal information within the same privacy standards and procedures.

Some of our properties are fitted with SunAmp batteries. Where Sunamp batteries has been fixed, anonymised data will be sent and you will be asked to sign a consent form.

Where there is a high risk to your personal information we will complete a privacy assessment before we share personal information to make sure we protect privacy and comply with the law.

Sometimes we have a legal duty to provide personal information to other organisations, this is often because we need to give that data to the police, courts, local authorities or government bodies.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- in order to detect and prevent a crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- safeguarding of vulnerable individuals
- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

For all of these reasons the risk must be serious before we can override your right to privacy.

We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so and will not cause harm, distress or further risks to you, our staff, other professionals and/or the public.

## Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted'
- Pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of the Places for People Group could work on your information for us without ever knowing it was yours
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches)

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

**Where in the world is your information?**

The majority of personal information is stored on systems in the UK. But there may be some occasions as our technology services progress where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

## How long do we keep your personal information?

There's often a legal or a contractual reason for keeping your personal information for a set period of time. We will keep your information for the duration of providing a service or product to you under the terms of a contract, such as your tenancy agreement. When your contract has ended we will keep your personal data for a set time for auditing and reporting purposes and for legitimate interest purposes, after that time we will either anonymise or destroy your information.

You can ask us for a copy of our retention periods by contacting us at dataprotection@castlerockedinvar.co.uk

## Your Rights

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

### You can ask for access to the information we hold about you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

A request for personal information can be made via email or in writing. This is known as a subject access request. In order to make a subject access request you will need to provide the following information:

- your name
- your address
- enough information to identify your records

If we have doubts about your identity or we are finding it difficult to locate your personal information we may ask you to provide us with proof of identity.

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number)
- Copy driving license picture with signature (please remove your driver number)
- Copy of signed tenancy or contract with us

You can write to us at the following address:

Castle Rock Edinvar
Data Protection Officer
1 Hay Avenue

Edinburgh
EH16 4RW

Alternatively email us at dataprotection@castlerockedinvar.co.uk. (Please ensure you attach enough information for us to identify your records). We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

We can refuse to handle your request for access if it is manifestly unfounded or excessive.

**You can ask to change information you think is inaccurate**

You should let us know if you disagree with something we may have recorded about you.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

**You can ask to delete information (right to erasure)**

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place.
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it).
- Where there is no legal reason for the use of your information.
- Where deleting the information is a legal requirement.

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- You have an account with us such as an application or a tenancy
- we're required to have it by law
- it is for historical research, or statistical purposes where it would make information unusable

**You can ask to limit what we use your personal data for**

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate personal information, and have told us of it
- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

**You can ask to have your information moved to another provider (data portability)**

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However this only applies if we're using your personal information with consent (not where we are processing your personal information for contractual, legitimate interests, legal obligations or vital interests as a legal basis) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to most of the services you receive from Castle Rock Edinvar.

**Right to understand Automated Decisions made about you**

We do not process your personal data using automated decisions.

You also have the right to object if you are being ‘profiled’. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health.

If and when your personal information is used to profile you, in order to deliver the most appropriate service to you, you will be informed.

## How to tell us of a data breach

Castle Rock Edinvar and Places for People Group takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach please tell us by using this link: Click Here

The above link has been made available to everyone with whom we deal so that customers, employees and supply chain processors can tell us without undue delay of a potential or actual breach.

## Where can I get advice?

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Group Data Protection Officer at data.protection@placesforpeople.co.uk

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner’s Office (ICO) at:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively visit ico.org.uk or email casework@ico.org.uk

# Data and Information Retention Policy

# 1 Introduction

1.1 Any PfP Group Company, like all other organisations, captures, stores, uses or shares (processes) large amounts of data to manage its day-to-day business operations, which will require processing personal information. Each PfP Group Company need to retain some of this data for various reasons, including legal or regulatory requirements, recovery in the event of a disaster or for predictive and trend analysis.

1.2 This data cannot be retained indefinitely for legal, regulatory or practical reasons. Each PfP Group Company requires a structured, standard and transparent way of working to manage and govern its data.

1.3 The *Data and Information Retention Policy,* along with other relevant policies (Section 8 'Related Policies and other Documents'), sets out the standards and rules that support effective data and information management and governance.

1.4 Any PfP Group Company must recognise the importance of effective data and information management and governance, which includes data permissions, in order to:

1.4.1 Comply with legal or regulatory requirements to minimise the risk of a data breach. e.g. GDPR gives more control and protection to individuals, in the European Union and European Economic Area, over their personal data and how it is processed.

1.4.2 Support the individual's rights.

1.4.3 Increase operational efficiency and effectiveness of the workforce through friction-free access to trusted data to support operational activities and digital ways of working.

1.4.4 Leverage data and information as an asset to enable informed decision making that drives the PfP Group Company strategy and business objectives.

1.5 All PfP Group Companies are committed to protecting the rights and privacy of individuals, in order to ensure compliance with the current General Data Protection Regulation (GDPR).

Note: Financial implications of non-regulatory compliance.

1.6 Information Commissioners Office (ICO) has the power to impose large fines, up to €20m or 4% of a company's total annual turnover, if an organisation is found to be in breach of GDPR.

Note: Implications for any Breaches of the Policy

1.7 Please be aware that a failure to comply with any aspect of this Policy may result in disciplinary action being taken. If there are serious breaches of this policy this may be considered as gross misconduct under the Disciplinary policy. If you are unsure of anything in this data policy, please seek further guidance from the Data and Analytics team.

# 2 Purpose

2.1 Data and information retention is about the storage of data and information, structured or unstructured (electronic or document), for a period of time, after which an action is taken, for example delete, archive or anonymisation. Some data or information can be held indefinitely. Refer to Appendices A and B in this policy.

2.2 The purpose of the *Data and Information Retention Policy* is to define the standards, rules

and schedules of how the PfP Group Companies will manage and govern the retention of data and information. The policy will determine how long data and information should be retained and what action should be taken once the retention period has expired.

2.3 The *Data and Information Retention Policy* has two parts:

2.3.1 Part 1 is the policy section and defines the principles, standards and rules.

2.3.2 Part 2 are the schedules that defines the period of retention for each data item or data classification. The schedules are flexible and can be updated, under strict change control, in line with the PfP Group Companies business requirements and/or regulatory requirements. These changes, based on any regulatory compliance, can only be defined by the Data Protection Office.

2.4 This policy applies to the PfP Group Companies workforce and the workforce of third parties that contract with them (refer to definition of Workshop above).

# 3 Objective

3.1 The objectives of this policy are to ensure the PfP Group Companies workforce, and that of third parties, are:-

3.1.1 Fully aware of the Data and Information Retention Policy and the General Data Protection Regulation (GDPR).

3.1.2 Understand their responsibilities in order to comply with the policy, which includes aspects of GDPR.

3.2 Apply the data and document types with their regulatory retention periods, as defined by the Data Protection Officer.

3.3 Deviations from the regulatory retention periods are allowed if there are valid and recognisably legitimate reasons why the data and documents are to be retained for longer. E.g. Litigation / legal action that has, is or will be taking place.

# 4 Scope

4.1 Incorporates GDPR and best practice data management principles.

4.2 Covers data that is processed by any PfP Group Company.

Note: The scope is to ensure that personal identifiable data that can identify a person (i.e. GDPR sensitive data) is managed as a priority under this policy.

4.3 Covers structured data and unstructured documents across all mediums e.g. digital, paper.

# 5 Data and Information Retention Policies (Rules – Mandatory)

## 5.1 All Data

5.1.1 Data retention schedules must be set at the PfP Group Company level and the schedule must accommodate and capture legitimate variations for a business area.

5.1.2 All data must have a retention schedule that determines how long it should be retained and what action should be taken once the retention period has expired.

Note: Data retention schedules are agnostic to the application it is stored in, the medium or format of the data.

5.1.3 The period of retention starts once the original purpose and/or activity for processing the data has legitimately ceased to exist or be active.

5.1.4 Copies of the data should be kept to a controlled minimum and must all contain the same length of the retention period.

5.1.5 Other copies of the data should be destroyed as soon as they are no longer required for immediate operational use.

5.1.6 All data must be stored securely and the necessary security protections must be codified to apply automatically.

Note: Data that is not stored electronically (e.g. on paper, disc) for legal or legitimate operational reasons, must be stored in a secure location that must be locked e.g. Data Lockers etc

5.1.7 Data that is within the retention period must be traceable and retrievable.

5.1.8 Retention schedules must be built into the data structure, i.e. the data architecture.

5.1.9 The duration that the data can be kept for and the subsequent action to be taken when the retention period expires, must be coded so the data to which the retention period applies, can be deleted automatically or if the records are to be kept for maintain context and structure of the full record but the specific data in the record that has passed retention value but needs keeping, must be anonymised..

5.1.10 Where this is not possible, e.g. paper documents, permission must be sought from the Data Owner, before they can be disposed of in secure waste bins for this purpose.

Note: Confidential and/or sensitive data must not be disposed of in the general rubbish bins.

## 5.2 Personal Data

5.2.1 Personal data must only be processed for the original purpose that it was intended for, as agreed by the individual.

5.2.2 Personal data must not be kept for longer than stipulated by the retention schedule, unless:

5.2.2.1 Explicit consent is re-sought from the individual.

5.2.2.2 The data is anonymised and the individual cannot be identified by any combinations of the data.

5.2.3 The retention schedule must determine what personal data needs to be anonymised if the data is to be used for further processing when the retention period has expired.

Note: Consent from the individual is not required to process the data after the retention period has expired if the personal data is anonymised.

## 6 Guidelines (Good practice - Optional)

6.1 The PfP Group Companies workforce, and that of contracted third parties, have a responsibility to consider the safety and security of the processed data.

6.2 Operational, confidential and/or sensitive data, in particular personal data, should not be stored in emails. Emails containing such data either in the body of the email or as an attachments, must be stored in an appropriate application or document management application.

6.3 Confidential and/or sensitive data should not be left in the open, e.g. on a desk or a printer, and must be stored appropriately (Clear desk policy).

6.4 Paper documents should be kept to a minimum and the digitisation of documents should be encouraged.

6.5 Paper documents that are referenced infrequently should be stored in an appropriate off-site secure facility and catalogued to facilitate retrieval.

## 7 Roles and Responsibilities

All PfP data will have a number of roles assigned against it. The roles and their respective responsibilities will need to be assigned. These role responsibilities specified here are specifically associated with this policy and are a subset of their overall responsibilities.

| Role | Responsibilities |
|---|---|
| Application Data Owner | • It is the responsibility of each Application Data Owner in each Business area to maintain and review their Data Retention Logs on an annual basis and to apply the correct Data Retention value to their data types.<br>• Application Data Owners and Process Owners must actively endorse and promote the Data and Information Retention policy and ensure a compliance culture is embedded in each of their own Business areas. |
| Data and Analytics team | • Responsible for both Data Governance and Data Quality, two functions that are imbedded in the overall data management function, which includes checking that data retention values are applied and being adhered to by applications, both manually and automatic functionality.<br>• The team are there to provide guidance and advice on most data related matters, if required. e.g. completion of the data retention log and the central PfP Group Company association of data classes (personal data, financial data, tax data etc) to the correct Data and Information Retention values. |
| PfP Group Company | • This Data and Information Policy applies to all PfP Group workforce, executive and non-executive directors or 3rd parties who process PfP Group Company data in any form (Electronic or Manual (Paper) |

| | |
|---|---|
| PfP Group Company workforce | • All PfP Group Company workforce, whether technical or administrative, who create, receive or use any PII data, have responsibilities to comply with this Data Information De-Identification policy. All Workforce are responsible for:<br>- Ensuring they understand this policy.<br>- Ensuring all data breaches or suspected breaches of confidentiality or information security relating to PII data, are reported for immediate investigation.<br>• Highlight any areas of identified potential weakness relating to PII data risk, which could compromise GDPR compliance regulation and report these to their immediate manager, for appropriate corrective action. |

## 8. Related Policies and other Documents

Note: This policy is linked to the following PfP Group Company policies and other relevant documentation which underpin compliance with this policy. They include, but are not limited to:

| |
|---|
| Data and Information Ownership Policy |
| Data and Information De-Identification Policy |
| Data and Information Encryption Policy |
| Data and Document Archiving, Deletion and Removal Policy |

## 9. Disclaimer

9.1 This policy is not intended to be comprehensive, but to act as a guide. Should you have further questions about this and other data policies, standards or procedures then please speak to your manager or contact the PfP Data and Analytics team.

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Part of
Places for People