

## KEYSTAGE HOUSING customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

### Contact details

#### Post

Keystage Housing CIC, 29 Park Street West, LUTON, Bedfordshire, LU1 3BE, GB

#### Telephone

03300945954

#### Email

communications@keystagehousing.co.uk

### What information we collect, use, and why

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes**:

- Name, address and contact details
- Video recordings of public areas (including corridors, waiting rooms and outside spaces to which some or all members of the public have access)
- Audio recordings of public areas (including corridors, waiting rooms and outside spaces to which some or all members of the public have access)

- Video recordings of private or staff only areas (including staff rooms, offices, surgical areas, consultation areas and outside spaces to which only staff or patients have access)
- Audio recordings of private or staff only areas (including staff rooms, offices, surgical areas, consultation areas and outside spaces to which only staff and patients have access)
- Financial information eg for fraud prevention or detection

We also collect the following information **for the prevention, detection, investigation or prosecution of crimes:**

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information

We collect or use the following information **for safeguarding or public protection reasons:**

- Name, address and contact details
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)



- Records of meetings and decisions

We also collect the following information **for safeguarding or public protection reasons:**

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Health information

We collect or use the following personal information **to comply with legal requirements:**

- Name
- Contact information
- Identification documents
- Health and safety information
- Financial information
- Safeguarding information
- Criminal offence data

We also collect the following information **to comply with legal requirements:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information



We collect or use the following personal information **for recruitment purposes:**

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks )

We also collect the following information **for recruitment purposes:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims:**

- Names and contact details
- Address
- Purchase or service history

- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect the following information **for dealing with queries, complaints or claims**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:



Keystage Housing  
Park West House, 29 Park Street West  
Luton, Bedfordshire LU1 3BE



03300 945 945  
hello@keystagehousing.co.uk  
[keystagehousing.co.uk](http://keystagehousing.co.uk)

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life





sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Vital interests** – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

## Where we get personal information from

- Regulatory authorities
- Family members or carers
- Social services

## How long we keep information

Department	Data Controller	Title	Data Items	Data Retention
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Keystage Housing  
Park West House, 29 Park Street West  
Luton, Bedfordshire LU1 3BE



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hello@keystagehousing.co.uk  
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IT/Admin	Keystage Housing	General Email enquiry	Name, Email	12 months
HR	Keystage Housing	Interview Notes & CVs	Name, Address, Email, Telephone	2 years
HR	Keystage Housing	Payroll/Salary Records	Name, Tax Code, Financial Data	7 years post leaving employment
HR	Keystage Housing	Bank Details	Bank Details	7 years post leaving employment
HR	Keystage Housing	Staff Directory	Name, Email, Telephone, DOB	Removed during offboarding
HR	Keystage Housing	Staff Photos	Name, Staff Role, Staff Photo	Removed during offboarding
HR	Keystage Housing	License Details (e.g driving)	Name, ID number, License details	Removed during offboarding
HR	Keystage Housing	Timesheets	Name, Hours worked	7 years post leaving employment
HR	Keystage Housing	Expenses	Name, Financial Data	7 years post leaving employment
HR	Keystage Housing	Absence Records	Name, Absence record	7 years post leaving employment
HR	Keystage Housing	Disciplinary & Conduct Records	Name, Personal conduct records	7 years post leaving employment
HR	Keystage Housing	Sickness Certificates & Doctors Notes	Name, Health related data	7 years post leaving employment
HR	Keystage Housing	Hazardous substances Health Regulations	Name, Certificates	10 years
HR	Keystage Housing	Health & Safety/Accident Records	Name, Incident reports	10 years
HR	Keystage Housing	Maternity/Paternity Records	Name, Health related data	7 years post leaving employment
HR	Keystage Housing	Performance Reviews	Name, Performance notes	7 years post leaving employment
HR	Keystage Housing	Redundancy Records	Name, redundancy details	7 years post leaving employment
HR	Keystage Housing	Training Records	Name, training completed	7 years post leaving employment
HR	Keystage Housing	Parental Leave	Name, details and reason for leave	7 years post leaving employment
HR	Keystage Housing	Pension Records	Name, address, Financial Data	7 years post leaving employment
HR	Keystage Housing	Compassionate Leave	Name, reasons for leave	7 years post leaving employment
HR	Keystage Housing	Health Insurance	Name, address, account number, cover details	7 years post leaving employment
HR	Keystage Housing	Life Insurance	Name, address, account number, cover details	7 years post leaving employment
Finance	Keystage Housing	Standing Orders	Name, Bank Account Details	7 years
Finance	Keystage Housing	Customer Accounts	Name, Email, Address, Telephone, Payment Details	7 years
Finance	Keystage Housing	Customer Credit	Name, credit details	7 years
Finance	Keystage Housing	Direct Debits	Name, Bank Account Details	7 years
Finance	Keystage Housing	Commercial Accounts	Name, Email, Telephone, Payment Details	7 years
Finance	Keystage Housing	Supplier Payments	Name, Email, Telephone, Payment Details	7 years
Finance	Keystage Housing	Supplier Management	Name, Email, Telephone, Payment Details	7 years
Finance	Keystage Housing	Invoices	Name, Email, Address, Telephone, Payment Details	7 years
Operations	Keystage Housing	Referral	Name, Address, Telephone, DOB, Medical History	7 Years
Operations	Keystage Housing	Service User Profile	Name, Address, Telephone, Email, DOB, Medical History, NOK, Benefit Details, Photo	7 Years

Operations	Keystage Housing	Incident Record	Name, DOB, Incident Report	7 Years
Operations	Keystage Housing	HAP/PEEP	Name, DOB, Medical History, Personal History, Access Requirements	7 Years

## Who we share information with

### Others we share personal information with

- Other health providers (eg GPs and consultants)
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Professional consultants

## Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);

- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

## Last updated

27 January 2025



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