

BELFAST GROUP NI

Privacy Notice

Temporary Accommodation Form - Service User Referral

Version 1.1 - Effective: 26 May 2026 - UK GDPR, Data Protection Act 2018 and applicable UK data protection law

1. Who we are

Belfast Group NI ("we", "us", "our") provides temporary accommodation services across Northern Ireland in partnership with the Northern Ireland Housing Executive (NIHE) and other referring agencies.

Belfast Group NI is the controller for the personal data we collect and use through the Temporary Accommodation Form for our accommodation operations. Where NIHE or another referring public authority collects or shares information with us for its own statutory housing functions, that organisation may also be an independent controller for its own processing.

2. Scope of this notice

This notice explains how we collect, use, store and protect personal data submitted through the Temporary Accommodation Form, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and applicable UK data protection law.

If a housing advisor or referring agency completes the form on behalf of a service user, they should make this notice available to the service user where practicable.

3. Personal data we collect

The form collects the following information about the service user and the referring housing advisor.

Data field	Required	Category	Data subject
Guest name	Yes	Identification data	Service user
Voucher number	Yes	Reference / case identifier	Service user
Check-in date	Yes	Service delivery data	Service user
Phone number	Yes	Contact data	Service user
Property (Botanic Rest / Camera Guesthouse / Ireton)	Yes	Service allocation	Service user
Acceptance status of service user	Optional	Service delivery data	Service user
Housing advisor's email	Yes	Contact data (professional)	Referring housing advisor

We do not request special category data (for example health, ethnicity or religion), criminal offence data or financial information through this form. Please do not include this information in free-text fields or attachments. If such information is submitted unexpectedly, we will restrict access, minimise its use and delete it where it is not needed for safeguarding, legal, contractual or service-delivery reasons.

4. Source of the data

We usually receive the information from the referring housing advisor, NIHE or another referring agency. In some cases, information may also be confirmed directly with the service user.

5. Purpose and lawful basis for processing

We process this data for the following purposes:

- to confirm and record the placement of a service user into one of our properties;
- to coordinate check-in logistics with front-desk, housekeeping and operations teams;
- to maintain an internal record of accommodation provided, including compliance with agreements with NIHE and other referring bodies;
- to communicate with the referring housing advisor regarding the placement;
- to protect service users, staff and property where necessary; and
- to comply with legal, regulatory, audit, insurance and contractual obligations.

The lawful bases under Article 6 UK GDPR on which we rely are:

- Article 6(1)(b) - Performance of a contract: where processing is necessary to provide or administer the accommodation service requested.
- Article 6(1)(c) - Legal obligation: where processing is necessary to comply with legal duties, including record-keeping, health and safety, safeguarding or regulatory requirements.
- Article 6(1)(f) - Legitimate interests: for internal operational coordination, service administration, security, audit, insurance and communication with referring agencies, where these interests are not overridden by the rights and freedoms of the data subject.
- Article 6(1)(d) - Vital interests: in rare situations where processing is necessary to protect someone's life or physical safety.

Where NIHE or another public authority refers a placement, that authority may rely on Article 6(1)(e) - public task - for its own statutory housing functions. Belfast Group NI does not rely on public task unless a relevant function has been conferred on us by law.

6. Requirement to provide the data

The required fields are needed to arrange and administer the accommodation placement. If the required information is not provided, we may be unable to confirm the placement, coordinate check-in or maintain the records required for the service.

7. Who has access to the data

Access to the information submitted is limited to people and organisations who need it for the purposes described in this notice, including:

- authorised Belfast Group NI staff, including management, reception and operations;
- the referring housing advisor or referring agency named in the submission;
- NIHE, where the referral originated from or relates to a NIHE placement;
- Microsoft Corporation, as our processor, where data is stored or processed within Microsoft 365 / SharePoint under our tenant agreement;
- professional advisers, insurers, IT support providers, auditors or regulators where required; and
- emergency services or safeguarding bodies where necessary to protect people or comply with the law.

We do not sell, rent or share personal data with third parties for marketing purposes.

8. International transfers

Data is stored within the Microsoft 365 environment. Where Microsoft or another approved processor transfers personal data outside the UK, appropriate safeguards are used, such as UK adequacy regulations, Standard Contractual Clauses and the UK International Data Transfer Addendum where required.

9. Retention

We retain submitted data only for as long as necessary to fulfil the purposes set out above and to meet legal, regulatory, audit, insurance and contractual obligations. As a guideline, referral and placement records are retained for a maximum of 7 years from the date of the placement, unless a longer period is required for legal claims, safeguarding, audit or regulatory reasons. Records are then securely deleted or anonymised.

10. Security

We apply appropriate technical and organisational measures to protect the data against unauthorised or unlawful access, accidental loss, destruction or damage. These include access controls, multi-factor authentication, encryption in transit and at rest, staff access reviews and role-based permissions.

11. Automated decision-making

We do not use the information submitted through the Temporary Accommodation Form for solely automated decision-making or profiling that has legal or similarly significant effects.

12. Your rights under UK GDPR

Depending on the circumstances and lawful basis, you may have the following rights in relation to your personal data:

- right of access - to request a copy of the data we hold about you;
- right to rectification - to request correction of inaccurate or incomplete data;
- right to erasure - in defined circumstances;
- right to restrict processing - in defined circumstances;
- right to object - particularly where processing is based on legitimate interests;
- right to data portability - where applicable; and
- right to lodge a complaint with the Information Commissioner's Office (ICO).

Rights are not absolute and may be limited where we need to keep information for legal, safeguarding, contractual, audit or regulatory reasons.

The ICO can be contacted at <https://ico.org.uk> or by calling 0303 123 1113.

13. Contact us

Belfast Group NI - Data Protection

Email: bookings@belfastgroupni.com

For data subject requests, please include "Data Protection Request" or "Subject Access Request" in the email subject line. We aim to respond to valid requests within one calendar month, in line with UK GDPR requirements.

14. Changes to this notice

We may update this Privacy Notice from time to time. The current version, together with its effective date, is published with the Temporary Accommodation Form and on our website. Material changes will be communicated through the form interface where appropriate.

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