

# Privacy Notice for Housing Needs & Options

We are a local housing authority with a legal obligation to take action to prevent homelessness and provide assistance to people threatened with or who are homeless.

Most of the personal information we hold about you is provided by you. The information collected and held will vary and depend on the nature of the service. If you choose not to provide us with the information we ask for, in many cases, we will not be able to provide you with the homelessness service.

**Processing activity** - we will process personal information relating to:

- applications for housing assistance
- inquiries as to whether any duty is owed under Part 7 Housing Act 1996
- assessments
- complaints
- advice and information
- call recording
- Identification checks
- payments, collections, and recovery
- general correspondence between you and us on matters related to our homelessness services

**Information requirements** - our processing activities may include:

- your name
- address
- nationality
- language
- date of birth
- gender
- relationship status
- sexual orientation
- Information relating to members of your household including children
- unique identifiers (such as National Insurance Number)
- signature(s)
- Kent Homechoice number(s)
- employment information
- change of circumstance details
- medical and welfare details
- ethnicity, race and religion
- immigration status
- bank details
- financial information – this may include your income, expenditure and payslips
- Section 21 Assured Shorthold Tenancy notice(s)
- personalised housing plans
- reviews and appeals
- call recordings
- ID (driving license/passport)
- Images
- Criminal convictions/offences

**Lawful bases** - our lawful bases for processing your personal information and relevant legislation:

- consent
- our legal obligations under Part 7 Housing Act 1996
- our legal obligation(s) under the Homelessness (Suitability of Accommodation) (England) Order 2003
- our legal obligation (s) under the Homelessness Reduction Act 2017
- our legal obligation(s) under the Digital Economy Act 2017
- Social Security (Information-sharing in relation to Welfare Services etc.) Regulations 2012
- Legitimate interests

UK GDPR Article 6(1)(e) and section 8(c) DPA 2018 - necessary for the performance of a task in the public interest or in the exercise of official authority vested in us under the above legislation and the General Power of Competence (Localism Act 2011 s1)

UK GDPR Article 9(2)(g) and DPA 2018, Schedule 1, Part 2, para.6(1) & (2)(a)) - special category personal data - where processing is necessary for the reasons of substantial public interest.

UK GDPR Article 10 as supplemented by DPA 2018 section 10(5) & Schedule 1, Part 2, paras. 6(1) and (2)(a)) - (criminal convictions and offences) - where processing is necessary for reasons of substantial public interest.

**Reasons for processing** - some of the information that is collected and shared is classified as:

- special category personal data;
- criminal convictions and offences (including alleged offences).

This is processed for reasons of substantial public interest under the laws that apply to us (see above) where this helps to meet our broader social obligations such as where it is necessary for us to fulfil our legal obligations and regulatory requirements. We have a Data Protection Policy that sets out how this information will be handled.

## **Data processors**

We use the Kent Homechoice database hosted by Huume Ltd. They are only permitted to process your data in accordance with our written instructions in order to provide you with the services you need. This is used for Housing Register Applications and homelessness processing functions.

We also use Encompass LATC LTD, a Local Authority Trading Company wholly owned by the London Borough of Sutton for the Council to store and view historic homelessness and housing register records in accordance with our retention policy requirements.

Click here to view the [Kent Homechoice](#) Privacy Notice.

## **Policy in Practice**

Our housing team may use the LIFT dashboard to support households who are homeless or at risk of homelessness. This may include non-statutory assistance in the form of the funding, planning, monitoring or delivery of housing-related support services.

Please see our Benefits Privacy Notice at [www.dover.gov.uk/privacy](http://www.dover.gov.uk/privacy) for further information on the Councils use of the Low-Income Family Tracker (LIFT) Dashboard.

**Data sharing** – your personal information may be shared with and/or obtained from:

- Others departments - Dover Asylum Resettlement Team (DART) & Homes for Ukraine Team
- Ombudsmen
- courts/tribunals
- housing associations
- external service providers
- local authorities
- Experian
- Border Force
- Kent County Council (safeguarding)
- Department for Work and Pensions
- Department for Education
- Prison Service
- Ministry of Justice
- Ministry of Housing, Communities & Local Government (for the purpose of evaluating and researching homelessness nationally) (see 'Downloads' below for MHCLG's Privacy Notice and Privacy Information Leaflet)
- elected Councillors and/or Member of Parliament • our designated person (housing ombudsman related complaints)
- your nominated friend, relative or advocacy worker
- Porchlight
- Citizen's Advice Bureau
- Kent Homechoice/Locata Housing Services
- Refuge – (independent domestic violence advocate)
- private sector landlords
- lettings agents
- mortgage lending companies
- Job Centre Plus
- HM Land Registry
- Ministry of Defence
- Probation Service
- youth offending services
- health services
- employers
- secure training units
- Utilities
- friends and relatives you and your household may have been living with
- voluntary sector organisations
- temporary accommodation providers
- multi-disciplinary teams ie: a group of professionals from one or more clinical disciplines who together with local authorities and other support agencies provide practical assistance for individuals who, by reason of age, illness, disability, pregnancy, childbirth, dependence on alcohol or drugs, or any other similar circumstances, are in need of such assistance.

We may rely on a number of exemptions, which allow us to share information without needing to identify a lawful basis for the sharing and without needing to provide you with information about the sharing. Please refer to the [Kent & Medway Information Agreement](#) for further details on our sharing arrangements.

### **Retention period**

We keep your personal information for the minimum period necessary. All information will be held securely and disposed of confidentially, for more information on retention please view our [Corporate Privacy Notice](#).

### **Anonymization**

Your personal information may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports.

### **Right to object**

Where processing your personal information is required for the performance of a public interest task (see our lawful bases above), you have the right to object on 'grounds relating to your particular situation'. We will have to demonstrate why it is appropriate for us to continue to use your personal data.

### **Changes to this Privacy Notice**

We review this Privacy Notice regularly and will place updates on our website. Please refer to our [Corporate Privacy Notice](#) for further details of how we process your personal information and for details on your additional rights.