

Privacy Notice for Private Sector Housing

We aim to [improve the standard of private sector properties](#) through grant assistance, enforcement action, education and advice.

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 service.

Processing activity - we will process personal information relating to:

- inspecting private residential accommodation
- issue of improvement notice(s)
- making prohibition order(s)
- taking emergency remedial action
- making emergency prohibition orders
- licencing and inspection of properties in multiple occupation (HMOs)
- licencing of caravans, camping sites and mobile homes
- advice to landlords and private sector tenants
- help and assistance to return empty properties to residential use
- administering disability facilities grant
- administering discretionary assistance
- energy savings advice
- landlords' forum
- property accreditation scheme application process for single homes and HMOs
- housing options for people with disabilities
- housing condition reports for immigration purposes
- record of fee payments (excluding bank/credit card details)
- applying for banning order(s) (rogue landlords and letting agents)
- applying for rent repayment order(s) (rogue landlord(s) and letting agents)

Information requirements - our processing activities may include:

- your name
- address
- nationality
- date of birth
- unique identifiers (such as National Insurance Number)
- signature(s)
- change of circumstance details
- medical and welfare details
- housing needs' assessment(s)
- GP/support worker details
- carer details
- licences
- satisfaction surveys
- other occupants in your home (including children)
- call recording
- property ownership
- tenancies

Lawful bases - our lawful bases for processing your personal information are:

- our legal obligation(s) under the Caravan Sites and Control of Development Act 1960
- our legal obligation(s) under the Protection from Eviction Act 1977
- our legal obligation(s) under the Home Energy Conservation Act 1995
- our legal obligation(s) under the Housing Grants, Construction and Regeneration Act 1996
- our legal obligation(s) under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
- our legal obligation(s) under the Licensing and Management of Houses In Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- our legal obligation(s) under section 85 Local Government Act 2003
- our legal obligations(s) under the Housing Act 2004
- our legal obligation(s) under the Housing & Planning Act 2016
- our legal obligation(s) under the Climate Change Act 2008
- our legal obligation(s) under the Energy Performance of Buildings (England and Wales) Regulations 2012
- our legal obligation(s) under the Mobile Homes Act 2013
- our legal obligations under the Smoke And Carbon Monoxide Alarm (England) Regulations 2015
- our legal obligation(s) under the Digital Economy Act 2017
- necessary for the performance of a task in the public interest or in the exercise of official authority vested in us in accordance with the legislation referred to above

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 Policy that sets out how this information will be handled.

Data processor- we use a number of external service providers to deliver our services such as loft/cavity insulation, collective switching scheme and handy persons. These companies are data processors for us and only process personal information in line with our instructions.

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

- Ombudsmen
- courts/tribunals
- housing associations
- external service providers
- Kent Fire & Rescue Service
- local authorities
- Border Force
- Kent County Council (safeguarding)
- NHS
- Mortgage providers
- DFG Agents (disability facilities grants)
- EE installers

- Utilities
- providers of contracted services for the collective switching scheme referrals
- elected Councillors and/or Member of Parliament
- Darent Valley Hospital
- home support (works in default and handy person assistance)
- private sector landlords
- lettings agents
- friends and relatives you and your household may have been living with
- voluntary sector organisations

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. The information outlined in this Privacy Notice will be kept in accordance with the retention periods referred to in our Information Asset Register (Private Sector Housing). All information will be held securely and disposed of confidentially.

Anonymisation- 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](#).

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Head of Housing	Policies/strategies on a range of service related matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	Fees for HMO/Caravan Sites' Licensing – schedule of fees	N/A	Supersedes previous version	Common Practice	Disposal	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	Single household disrepair case management and harassment & illegal eviction cases - case file material – correspondence, notices, decisions etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info etc.	Public interest task – Protection from Eviction Act 1977 Housing Act 2004 (as applicable)	Yes – health data, alleged offences etc.	Substantial public interest – Protection from Eviction Act 1977 Housing Act 2004 (as applicable)	Paper copy &/o electronic	N/A but see safeguarding
External Services	Head of Housing	Houses in Multiple Occupation – checking standards/hazards under the Housing Act 2004 including HMO Management Regulations - case file material - correspondence, decisions, etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes) or when HMO property ceases to be an HMO (risks are higher and the Council may re-visit to check continued compliance with standards)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info etc.	Public interest task - Housing Act 2004 Licensing and Management of Houses In Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006	No	N/A	Paper copy &/or electronic	N/A – but see safeguarding

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

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External Services	Head of Housing	Houses in Multiple Occupation Licensing – case file material – correspondence, decisions, licences etc. Public Register	N/A	5 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes) or when HMO property ceases to be an HMO (risks are higher and the LA may re-visit to check continued compliance with standards)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details/ occupancy info, dates & places of birth, declarations etc.	Public interest task - Housing Act 2004 Licensing And Management Of Houses In Multiple Occupation And Other Houses (Miscellaneous Provisions) (England) Regulations 2006	Yes - racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest/ Legal obligation compliance Housing Act 2004	Paper copy &/or electronic	N/A
External Services	Head of Housing	Caravan Site Licences – site information, site owner personal data for licence. Public Register	N/A	2 years after expiry of licence	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) -- name, address, contact details/ occupancy info	Public interest task - Caravan Sites and Control of Development Act 1960	No	N/A	Paper copy &/or electronic	N/A
External Services	Head of Housing	Empty properties - case file material – correspondence etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – pensions, probate etc.	Public interest task -Housing Act 1985 Housing Act 2004 Section 85 Local Government Act 2003	No	N/A	Paper copy &/or electronic	N/A

² When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

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External Services	Head of Housing	Enforcement Action – formal actions – notices, works in default, management orders, single households, HMOs, HMO licensing, caravan site licences, empty properties, carbon/ smoke detectors	N/A	3 years from date of compliance with enforcement action (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details	Public interest task - Caravan Sites and Control of Development Act 1960 Housing Act 2004 Smoke And Carbon Monoxide Alarm (England) Regulations 2015 (as applicable)	Yes - racial or ethnic origin, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Legal claims/legal proceedings - Caravan Sites and Control of Development Act 1960 Housing Act 2004 Smoke And Carbon Monoxide Alarm (England) Regulations 2015 (as applicable)	Paper copy &/or electronic	N/A
External Services	Head of Housing	Disabled Facilities Grants - applications, correspondence, decisions customer satisfaction surveys etc.	N/A	11 years from date of grant payment 2 years where withdrawn or refused	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc.	Public interest task - Housing Grants, Construction and Regeneration Act 1996	Yes – health data	Substantial public interest - Housing Grants, Construction and Regeneration Act 1996	Paper copy &/or electronic	YES – with parental consent

³ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself “prevents data subjects from exercising a right or using a service or a contract

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External Services	Head of Housing	Discretionary Assistance – applications, correspondence, decisions etc.	N/A	<p>Decent Homes Assistance - Retained until sale</p> <p>Empty Homes Assistance - retained until sale</p> <p>Empty Property Loan Assistance - 4 years</p> <p>Property Accreditation Assistance - Retained until sale</p> <p>Solar Hot Water Assistance - 3 years</p> <p>Hard to Heat Homes - 3 years</p> <p>Decent Homes Assistance (top ups) - Retained until sale</p> <p>Coldbusters - 12 years</p> <p>Healthy Homes Assistance- 3 years</p> <p>Discretionary Assistance Grant – 3 years (unless cost is over £5000 and then 11 years)</p> <p>Winter Warmth Assistance – 10 years from payment</p> <p>Hospital Discharge Grant – 3 years</p> <p>Safe & Secure Grant – 3 years</p>	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc.	Public interest task – Housing Act 2004 Home Energy Conservation Act 1995 Digital Economy Act 2017 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Yes – health data	Substantial public interest - Housing Act 2004 Home Energy Conservation Act 1995 Digital Economy Act 2017 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Paper copy &/or electronic	N/A

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External Services	Head of Housing	Energy Efficiency – advice/assistance via third parties e.g. utility companies etc., promotional work	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial, dates of birth etc.	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes – health data	Substantial public interest – Home Energy Conservation Act 1995 Digital Economy Act 2017	Paper copy &/or electronic Alerts on DBC website	N/A
External Services	Head of Housing	Housing condition reports for Immigration Inspections – service offered for a fee to residents, interim & management orders (rogue landlords)	N/A	3 years after file closure	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name, address, contact details, financial, dates of birth etc. Financial penalties (rogue landlords)	Legal obligation compliance (where requested by Border Force) - UK Entry Clearance requirements Public interest task (where requested by service user) – UK Entry Clearance requirements	Yes - racial or ethnic origin, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Legal obligation compliance - UK Entry Clearance requirements Substantial public interest- - UK Entry Clearance requirements	Paper copy &/or electronic	N/A
External Services	Head of Housing	Emergency works - unsafe conditions in residential accommodation – case file material – correspondence, notices etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes- (identifiable natural persons only - name, address, contact details	Public interest task – Housing Act 2004	No	N/A	Paper copy/ electronic	N/A

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External Services	Head of Housing	Adaptations, small handy person jobs and information for older or disabled people -assist with hospital discharge and offering a service to help residents retain safe & independent living within their homes	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details)	Public interest task - Housing Act 2004 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Yes- health data	Substantial public interest- Housing Act 2004	Paper copy/electronic	N/A
External Services	Head of Housing	Works in default of enforcement action –case file material-correspondence, notices etc.	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details)	Public interest task- Housing Act 2004	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Collective Switching – electric/gas usage – bid to bulk buy – registrations/contract/ progress reports	N/A	5 years (registration etc..) 1 year from contract expiry	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details – received from IChoosr	Public interest task- Home Energy Conservation Act 1995 Digital Economy Act 2017	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	LA Flexible Eligibility Programme - energy efficiency measures, reports, spreadsheets, correspondence	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details)	Public interest task Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes health data	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Winter Warmth	N/A	11 years from date of grant payment. 2 years where grants approval not progressed	Common practice	Secure disposal	Yes – (identifiable natural persons only – name, address, contact details)	Public interest task – Home Energy Conservation Act 1995 Digital Economy Act 2017	Yes, health data	Substantial public interest- Home Energy Conservation Act 1995 Digital Economy Act 2017t	Paper copy/electronic	N/Z

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External Services	Head of Housing	Kent & Medway Sustainable Energy Partnership (Kent Warm Homes Scheme) - warm homes initiative	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial data)	Public interest task – Home Energy Conservation Act 1995	Yes - health data, benefit data	Substantial public interest task –Home Energy Conservation Act 1995	Paper copy/electronic	N/A
External Services	Head of Housing	Interreg 2 Seas Mers Zeeen - Triple – A - adoption of low-carbon technologies by home-owners through awareness and easy Access (Triple A)	N/A	5 years	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details, financial data)	Public interest task – Home Energy Conservation Act 1995	Yes, health data, benefit data	Substantial public interest task –Home Energy Conservation Act 1995	Paper copy/electronic	N/A
External Services	Head of Housing	Home Energy Conservation Act biannual reports	N/A	5 years	Common Practice	Disposal	No	N/A	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Kent & Medway Fire & Rescue Authority – consultations on improvement works to properties	N/A	3 years from date of file closure (may need to be kept beyond the retention e.g. for evidential purposes)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details)	Public interest task - Housing Act 2004	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes - (identifiable natural persons only - name, address, contact details)	Public interest task – in accordance with the legislation outlined in this IAR (as applicable)	Yes	Substantial public interest – in accordance with legislation as outline din this IAR (as applicable)	Paper copy/electronic	N/A
External Services	Head of Housing	Performance Indicators - for the PSH function	N/A	1 year from date of entry on Pentana	Common Practice	Disposal	No	N/A	No	N/A	Electronic – on Pentana	N/A
External Services	Head of Housing	Greenhouse Gas Emissions -reporting to Government	N/A	5 years	Common practice	Secure Disposal	Yes, name vehicle details, utility usage	Public interest task – Climate Change Act 2008	No	N/A	Paper copy/electronic	N/A

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External Services	Head of Housing	Display Energy Certificates and Energy performance certificates	N/A	10 years	Common practice	Secure disposal	Yes - individual property details	Public interest task - Energy Performance of Buildings (England and Wales) Regulations 2012	No	N/A	Paper copy/electronic	N/A
External Services	Head of Housing	Warmer Street Project- correspondence etc.	N/A	5 years (may need to be kept beyond the retention period for evidential purposes)	Common practice	Secure disposal	Yes – names, addresses etc.	Public interest task - Home Energy Conservation Act 1995	No	N/A	Paper copy/electronic	N/A
External services	Head of Housing	Rogue landlords & letting agents – Notice of intended proceedings, banning orders, database, rent repayment orders	N/A	For duration of banning order For duration of the period specified in the banning order offence decision notice	Statutory	Secure disposal	Yes- name, address, property details, financial penalties etc.	Public interest task - Housing and Planning Act 2016	Yes- conviction (including alleged offences)	Substantial public interest - Housing and Planning Act 2016	Electronic Public register	N/A
External Services	Head of Housing	Councillor & MP Enquiries	N/A	3 years (unless considered important for future reference)	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data etc. (as applicable)	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	Housing Ombudsman & Local Government & Social Care Ombudsman - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or 2 years after closure of case.	Common Practice	Secure Disposal	Yes - identifiable natural persons only) – name, address, contact details	Public interest task – Local Government Act 1974	Yes – racial/ethnic origin, health data, alleged offences etc. (as applicable)	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	Complaints – case file, correspondence etc.	N/A	Lifetime of tenancy or 3 years after closure of case.	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to legislation referred to in this IAR	Yes - racial or ethnic origin, state of health etc.	Substantial public interest pursuant to legislation referred to in this IAR	Paper copy &/or electronically in Idox	YES – with parental consent

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External Services	Head of Housing	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER 2018

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idox/UNIFORM and department computers and laptops, internet/intranet _ maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs, DPA compliant contracts
External Services	Head of Housing	Idox/UNIFORM and computers and laptops/Internet/ Intranet - -- input of data – PSH functions	Use of passwords
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Head of Housing	Disability Facilities Grant – financial assessment using FERRET program	User password
Internal Services	I.C.T. Manager	Stay Connected email alerts (DBC website)	Subscriber own password – unsubscribe at any time
External Services	Head of Housing	Disaster recovery	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	CCTV	A key part of the Council's security setup
External services	Head of Housing	Collective Switching	Use of passwords
External Services	Head of Housing	Warm Homes	Use of passwords
External Services	Head of Housing	LA Flex	Use of passwords

PRIVATE SECTOR HOUSING - INFORMATION ASSET REGISTER 2018

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal/sensitive data (as applicable)	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers YES/NO –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Courts/tribunals etc. 3.Housing Associations 4.Contractors 5.Ombudsmen 6.Peabody 7.Kent & Medway Fire & Rescue Authority 8.KCC 9.NHS 10.Social Services 11.Mortgage providers 12DFG agents 13.EE installers 14.Utilities (Digital Economy Act 2017) 15.Darent Valley Hospital 16.iChoosr	N/A	N/A	Pentana – Cloud based – retention only Secure Waste Disposal - no processing - Kent & Medway Information Sharing Agreement Aran Services Limited (LA Flexibility Eligibility Programme (loft/cavity) Peabody (Handyperson Scheme) iChoosr (collective switching scheme) Kent & Medway Sustainable Energy Partnership – Kent Warm Homes Framework ISA Kent & Medway Fire & Rescue Authority Fire Safety Protocol Contracts for Works in default/emergency remedial action	Pentana - BS ISO/IEC 27001:2013 compliant Secure Waste Disposal – confidentiality clause in contract KMISA - compliant Aran Services Ltd - compliant Peabody – ISA to be reviewed iChoosr – compliant Kent Warm Homes Framework (ISA) – to be reviewed KFRS - Protocol to be reviewed Works in default etc. – contract provisions to be reviewed	N/A	N/A	YES –HIGH – risk score 9