

Privacy Notice for Housing Services (Landlord & Tenant)

We are a [local housing authority](#) managing and maintaining all council owned properties in the borough of Dartford. We need to collect your personal information to administer our housing (landlord & tenant) services.

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:

- fixed term tenancies
- flexible tenancies
- introductory tenancies
- joint tenancies
- secure tenancies
- tenancy transfers
- choice based lettings
- leases
- homebuy application(s)
- adaptations for elderly and disabled tenants
- housing fraud
- housing offers
- specialist accommodation in housing schemes
- housing register
- key workers
- mutual exchange application(s)
- downsize for cash application(s)
- review(s) of suitability of accommodation
- appeals against banding
- private leasing scheme
- succession applications
- floating support referrals
- caravan sites' licensing
- community centre bookings
- removal of abandoned vehicles on council housing land
- rent collection
- dealing with arrears
- discretionary payments
- debt counselling
- tenant participation, including involvement in monitoring and review of service standards
- enforcement of tenancy conditions through court proceedings
- community protection notices
- repairs and maintenance
- managing lettings
- special needs referrals
- voids and under-occupation

- estate management and caretaking
- complaints
- right to buy
- waiting lists (banding system)
- special needs referral
- agreements for estate management schemes
- tenants' right to management audit
- call recording
- record of payment of rent (excluding bank/credit card details)
- general correspondence between you and us on matters related to our housing services

Information requirements - our processing activities may include:

- your name
- address
- nationality
- date of birth
- unique identifiers (such as National Insurance Number)
- signature(s)
- Kent HomeChoice number(s)
- bid(s) for council housing
- change of circumstance details
- financial circumstance details for review(s) of fixed term/flexible tenancies
- medical and welfare details
- housing needs' assessment(s)
- GP/support worker details
- carer details
- other occupants in your home (including children)
- notices for abandoned vehicle removal
- call recording

Children's information – we do not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

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

- our legal obligation(s) under the Anti-Social Behaviour Act 2003
- our legal obligation(s) under the Local Government Act 1974
- our legal obligation(s) under the Children Act 2004
- our legal obligation(s) under the Care Act 2014
- our legal obligation(s) under the Anti-Social Behaviour, Crime & Policing Act 2014
- our legal obligation(s) under the Prevention of Social Housing Fraud (Power to Require Information)(England) Regulations 2014
- 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 and:
 - Commonhold and Leasehold Reform Act 2002
 - Housing Act 1985
 - Housing Act 1996
 - Land Compensation Act 1973
 - Leasehold Reform, Housing And Urban Development Act 1993
 - Refuse Disposal (Amenity) Act 1978
 - Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994

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 processor- you provide some of your personal information through the Kent HomeChoice database hosted by [Locata Housing Services](#). We use a number of external service providers to deliver our services such as the out of hours, telecare and repairs to our housing stock. We use [Text Marketer](#) to send SMS messages to our tenants. 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:

- council departments
- Electoral Registration Officer
- Ombudsmen
- courts/tribunals
- housing associations
- external service providers
- HMRC
- Kent Fire & Rescue Service
- Homebuy Agent for Kent
- local authorities
- bailiffs
- Border Force
- Kent County Council (safeguarding)
- Department for Work and Pensions
- Prison Service
- providers of contracted service for floating support referrals
- Ministry of Housing, Communities & Local Government (submission of data on the age, gender, economic status, ethnicity and nationality of lead tenant & their household members ([CORE](#)))
- elected Councillors and/or Member of Parliament
- our designated person (housing ombudsman related complaints)
- your nominated friend, relative or advocacy worker
- North West Kent Volunteer Centre

- Age Concern
- Appetito
- SAFFA (the Soldiers, Sailors, Airmen & Families Association)
- district nurses
- Impact team (NHS)
- Mental Health team (NHS)
- Occupational Therapist (NHS)
- self-funding care agencies
- home support cleaners (self funders)
- private sector landlords
- lettings agents
- mortgage lending companies
- Job Centre Plus
- Ministry of Defence
- Probation Service
- The Language Shop (translation service(s))
- youth offending services
- health services
- employers
- secure training units
- Citizen's Advice Bureau
- friends and relatives you and your household may have been living with
- voluntary sector organisations

We may check your housing record against other records held by us such as housing benefits and the Electoral Register to aid with the detection of housing fraud and with our fraud department and law enforcement agencies such as the police to aid with the detection and prevention of criminal acts and with our agents during the course of debt collection.

We subscribe to a tracing system called [LoCTA](#) which allows us to search a subset of all subscribing local authorities' systems to trace former tenants or absentee leaseholders who have an outstanding rent debt and to verify previous addresses referred to in right to buy applications.

We may rely on a number of [exemptions](#), which allow us to share information without needing to comply with all the rights and legal obligations under the Data Protection Act 2018. 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 Registers (Housing Corporate Property Maintenance, Housing Management; Housing Policy Development, Housing Schemes & Finance & Housing Solutions). 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 at www.dartford.gov.uk for further details of how we process your personal information and for details on your additional rights.