

# Privacy Notice for Homelessness Services

We are a [local housing authority](#) with a legal obligation to take action to prevent homelessness and provide assistance to people threatened with or actually 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
- general correspondence between you and us on matters related to our homelessness 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)
- change of circumstance details
- medical and welfare details
- Section 21 Assured Shorthold Tenancy notice(s)
- personalised housing plans
- reviews and appeals
- call recording

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

- 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
- 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:

**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** – we use the Kent HomeChoice database hosted by Locata Housing Services. For homelessness applications, SurveyMonkey for questionnaires and/or surveys and Firmstep for our homelessness eligibility functions. They are only permitted to process your data in accordance with our written instructions in order to provide you with the services you need.

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

- 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
- North West Kent Volunteer Centre
- Citizen's Advice Bureau
- Kent HomeChoice/Locata Housing Services
- [Refuge](#) – (independent domestic violence advocate)
- YMCA
- private sector landlords
- lettings agents
- mortgage lending companies
- Job Centre Plus
- 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

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 for six years from the date of the file closure. 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.