

# 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. 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 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 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](#) for further details of how we process your personal information and for details on your additional rights.

# HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER

## 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIAs	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data <sup>1</sup>	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	Housing Maintenance Manager	<b>Procedure/guidance</b> on a range of matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Archive for 2 years -then dispose of	No	N/A	No	N/A	Electronic	N/A
Internal/ External Services	Housing Maintenance Manager	<b>Planned/responsive maintenance procurement</b> – to Council property portfolio –tenders, quotes etc.	N/A	6 years from date of works	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Housing Act 1985	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	<b>Surveys</b> - case file material – instructions reports, etc.	N/A	6 years from date of case file closure	Common Practice	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy &/or electronic in Idocs	N/A
External Services	Housing Maintenance Manager	<b>Asbestos Register and Management Plans</b> - for individual Council owned commercial properties	N/A	40 years from date of inspection	Statutory	Archive	Yes – location data	Legal obligation compliance - Control of Asbestos Regulations 2012	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	<b>Fire Certificates</b> - for individual Council owned commercial properties	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	<b>Electrical installation Certificates</b> – for individual Council owned commercial properties	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	<b>Energy Management</b> – records relating to energy management in Council owned buildings	N/A	Current year + 6 years	Statutory	Secure disposal	No	N/A	No	N/A	Paper copy &/or electronic	N/A
Internal/ External Services	Asset Holding Managers	<b>Equipment Testing</b> – e.g. fire extinguishers, PAT testing etc.	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	N/A	Paper copy &/or electronic	N/A

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External Services	Housing Maintenance Manager	<b>Repairs &amp; maintenance of Council housing stock</b> – case file material including complaints, request for works, instructions to contractors etc.	N/A	Whole life of the installation + 6 years	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy &/or electronic	N/A
External Services	Housing Maintenance Manager	<b>Waiting lists for sensitive planned works</b> - e.g. OAP decs/disabled adaptations	N/A	Supersedes previous version	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	Yes – health data	Substantial public interest	Electronic	N/A
External Services	Housing Maintenance Manager	<b>Planned/responsive maintenance repair - requests to</b> contractors for individual council properties	N/A	Whole life of the installation + 6 years	Common Practice	Secure disposal	Yes (identifiable natural persons only - name, address, contact details)	Public interest task pursuant to Housing Act 1985	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	<b>Gas Safety Checks' Certificates</b>	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Landlord & Tenant Act 1985 Gas Safety (Installation and Use) Regulations 1998	No	N/A	Electronic	N/A
External Services	Housing Maintenance Manager	<b>Fire Risk Assessments</b>	N/A	Whole life of the installation + 6 years	Statutory	Secure disposal	No	Public interest task pursuant to Regulatory Reform (Fire Safety) Order 2005	No	n/a	Electronic	N/A
External Services	Housing Maintenance Manager	<b>Legionella Risk Assessments</b>	N/A	Whole life of the installation + 6 years	Statutory	Archive	No	Public interest task pursuant to Health and Safety at Work etc. Act 1974	No	n/a	Electronic	N/A

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External Services	Housing Maintenance Manager	<b>Performance Indicators</b>	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Housing Maintenance Manager	<b>Correspondence (general)</b> - emails, letters, memos etc.	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	No	N/A	Paper copy/ Electronic	N/A
External Services	Housing Maintenance Manager	<b>Disabled Adaptation recommendations</b>	N/A	2 years after works completed	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to Housing Act 1985	Yes – health data	Substantial public interest	Paper copy &/or electronic	Yes – provided by parents /guardian
External Services	Housing Maintenance Manager	<b>Safeguarding Referrals</b> - concern cards from contractors	N/A	Immediately after referral processed and acknowledged by KCC	Statutory	Secure disposal	Yes - (identifiable natural persons only) - name, address, contact details	Legal obligation compliance – Care Act 2004	Yes – health data, alleged offences etc.	Legal obligation compliance	Paper copy &/or electronic	N/A
External Services	Housing Maintenance Manager	<b>PV Register notifications</b>	N/A	Immediately after adding to PV database	Common Practice	Secure disposal	Yes (identifiable natural persons only) – name, address	Public interest task – Health and Safety at Work etc. Act 1974	Yes – alleged offences	Substantial public interest	Electronic	N/A



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External Services	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - 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 Idocs	N/A
External Services	Head of Housing	<b>Complaints</b> – 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

# HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER 2018

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<b>Idocs/Academy/UNIF ORM and department computers and mobile telephones/Internet/ Intranet</b> –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
Internal Services	I.C.T. Manager	<b>Secure transfer of data between DBC &amp; Contractors</b>	Data encryption, crypto cards
External Services	Housing Maintenance Manager	<b>Idocs/UNIFORM/ Academy and computers and laptops/Internet/Intranet /Pentana</b> - – input of data – corporate property maintenance functions	Use of passwords
Internal Services	Policy & Corporate Support Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	<b>On-line payments (hosted by Capita)</b>	PCIDSS compliant
External Services	Housing Maintenance Manager	<b>Disaster recovery</b>	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	<b>CCTV</b> - maintenance & administration	A key part of the Council's security setup

# HOUSING CORPORATE PROPERTY MAINTENANCE - INFORMATION ASSET REGISTER 2018

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

Categories of data subject	Recipients of personal/sensitive data	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 2017 DPA requirements?	Marketing	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	N/A	N/A	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing  The Breyer Group  TSG Building Services  Pinnacle PSG  Frontline Data  Northgate Public Services	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  The Breyer Group - contract terms to be reviewed  TGS Building Services - contract terms to be reviewed  Pinnacle PSG - contract terms to be reviewed  Frontline Data - contract terms to be reviewed  Northgate Public Services - contract terms to be reviewed	N/A	YES –High - Score - 9

# HOUSING MANAGEMENT - INFORMATION ASSET REGISTER 2018

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External Services	Head of Housing	<b>Policies/strategies</b> - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes previous version	Common Practice	Secure disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>The process for applying for council housing</b> – forms and supporting material – application for mutual exchanges and supporting papers – application for transfer of tenancy and supporting papers	N/A	Lifetime of tenancy	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, age, gender, economic status, nationality	Public interest task – Housing Act 1985 Housing Act 1996	Yes - racial or ethnic origin, state of health	Substantial public interest – Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	<b>Anti-Social Behaviour</b> – case files and associated documents including , community protection notices, reports, decisions etc.	N/A	5 years or 1 year end of legal action or Lifetime of tenancy  CPNs - 2 years - from date of case closure (unless exceptional circumstances require longer retention e.g. pending court case or an appeal)	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligations - Anti-Social Behaviour Act 2003 Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes - racial or ethnic origin, state of health, offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest /legal claims/ legal proceedings/ unlawful acts - Anti-Social Behaviour Act 2003 Crime and Disorder Act 1998 Crime and Policing Act 2014	Paper copy and/or electronic	N/A

<sup>1</sup> 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	<b>The process for managing the tenancy of an individual</b> - correspondence and information provided by other agencies relating to special needs of current tenant	N/A	Life of tenancy	Common Practice	Secure disposal	Yes (identifiable natural persons only) - name, address, contact details, age, gender, economic status, nationality	Public interest task- Housing Act 1985 Housing Act 1996	Yes - health data//	Substantial public interest/health purpose/ – Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	<b>The process for managing the tenancy of an individual</b> – records relating to ex-offenders	N/A	Life of tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details, age, gender, economic status, nationality	Public interest task Housing Act 1985 Housing Act 1996	Yes - offences (including alleged offences) criminal proceedings outcomes and sentences (as applicable)	Substantial public interest /legal claims/ legal proceedings/ unlawful acts –Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
External Services	Head of Housing	<b>Court Orders</b>	N/A	Life of tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Anti-Social Behaviour Act 2003 Housing Act 1985 Housing Act 1996 Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes - offences (including alleged offences)	Substantial public interest - Legal claims/legal proceedings- Social Behaviour Act 2003 Housing Act 1985 Housing Act 1996 Crime and Disorder Act 1998 Crime and Policing Act 2014	Paper copy and/or electronic	N/A

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External Services	Head of Housing	<b>Rent arrears management</b> - correspondence, sent, received, notes on Capita, account details, HB liaison forms completion, Discretionary Housing Payments, applications to court via PCOL	N/A	Lifetime of Tenancy	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task- Housing Act 1985 Housing Act 1996	Yes – offences (including alleged offences)	Substantial public interest - Legal claims/legal proceedings Housing Act 1985 Housing Act 1996	Paper copy and/or electronic	N/A
Internal/External Services	Head of Housing	<b>Procurement relating to estate services</b>	N/A	Lifetime of contract	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Housing Act 1985	No	N/A	Paper copy and/or electronic	N/A
External Services	Head of Housing	<b>Resident meeting minutes</b>	N/A	1 year from date of meeting	Common practice	Secure disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>Issuing requests to contractors for individual properties</b> – estate cleaning contract	N/A	Lifetime of contract	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task – Housing Act 1985 Housing Act 1996	No	N/A	Electronic	N/A

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External Services	Head of Housing	<b>Performance Indicators</b> - the Housing Services function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Head of Housing	<b>General Correspondence</b> – letters, emails memos etc.	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 – Housing Act 1985 Housing Act 1996	No	Substantial public interest – Housing Act 1985 Housing Act 1996	Electronic	N/A
External Services	Head of Housing	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> complaints received and outcomes	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- health data etc.	Substantial public interest /legal obligations – Section 26(5) Local Government Act 1974	Electronic	N/A
External Services	Head of Housing	<b>CSU Daily Tasking</b> - notes of meetings	N/A	Reviewed and then destroyed	Common Practice	Secure disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task - Crime and Disorder Act 1998 Crime and Policing Act 2014	Yes- alleged offences - criminal proceedings outcomes and sentences (as app)	Substantial public interest - Crime and Disorder Act 1998 Crime and Policing Act 2014	Electronic (email)	N/A

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External Services	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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	<b>Complaints</b> – 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	Life of tenancy	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligations – 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 obligations – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

# HOUSING MANAGEMENT - INFORMATION ASSET REGISTER 2018

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<a href="#">Idox/UNIFORM and department computers and laptops/internet/intranet</a> –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	<a href="#">Idox/UNIFORM Academy/Pentana and computers and laptops/internet/intranet</a> – the housing management function	Use of passwords
Internal Services	Policy & Corporate Support Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	<a href="#">On-line payments (hosted by Capita)</a>	PCIDSS compliant
Internal Services	I.C.T. Manager	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time
Internal Services	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	<a href="#">CCTV</a> – maintenance and administration	A key part of the Council's security setup

# HOUSING MANAGEMENT - INFORMATION ASSET REGISTER 2018

## CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING, PORTABILITY 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 applicants, tenants, leaseholders, complainants, service users etc.	1.Council department(s) 2.Ombudsman 3.Courts 4.Police 6.HMRC 7.Kent & Fire Rescue 8.NHS 9.Local authorities 10.Bailiffs 11.KCC (safeguarding) 12.DWP 13.Prison Service 14.Providers of contracted service for floating support referrals 15.HCLG – submission of data on the age, gender, economic status, ethnicity and nationality of lead tenant & their household members (CORE)	YES – see Marketing – soft opt in rule (PECR)	N/A	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing –  Kent & Medway Information Sharing Agreement  Pinnacle Housing Limited (floating support referrals)	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  KMISA - compliant  Pinnacle Housing Limited – <b>contract being reviewed</b>		N/A	YES – High - risk score 8

# HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>1</sup>	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	<b>Policy and guidance</b> - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes previous versions	Common Practice	Archive	No	N/A	No	N/A	Electronic and paper copy	N/A
External Services	Head of Housing	<b>Appeals against banding assessment/access to housing register</b> – case file – correspondence, decisions etc.	N/A	In accordance with the Kent Homechoice Partnership Protocol	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 - – racial or Ethnic origin, state of health etc.	N/A	Electronic and paper copy - Idocs & Locata	N/A
External Services	Head of Housing	<b>Request for a review of suitability of accommodation</b> – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (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 pursuant to: Housing Act 1985 Housing Act 1996	Could contain personal data	N/A	Electronic and paper copy	N/A
External Services	Head of Housing	<b>Performance Indicators</b> - for the housing & development function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A

<sup>1</sup> 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

# HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	Government statistical returns covering the whole of housing service	N/A	1 year from date of entry on MHCLG website	Statutory	Disposal	No	N/A	No	N/A	Electronic – anonymised data on MHCLG website	N/A
External Services	Head of Housing	Registration of individuals' housing applications – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (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, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – racial or Ethnic origin, state of health etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	No
External Services	Head of Housing	Homebuy Applications – case file – correspondence, decisions etc.	N/A	6 years from date of expiry of tenancy (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	Performance of a contract/taking steps preparatory to such a contract	No	N/A	Electronic – (Homebuy Agent for BPHA)	N/A
External Services	Head of Housing	Correspondence (general) – emails, letters, memos etc.	N/A	3 year unless considered important for future reference	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest (subsidiary task)	No	N/A	Paper copy & or electronic	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.	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic in Idox	N/A

## HOUSING POLICY DEVELOPMENT - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>Complaints</b> – 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 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 electronic in Idox	YES – with parental consent

### TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<a href="#">Idocs/Academy and department computers and laptops/internet/intranet</a> –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
Internal Services	Policy & Corporate Support Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	<a href="#">Idocs/UNIFORM Academy/Pentana and computers and laptops/internet/intranet</a> – the housing policy & development function	Use of passwords
External Services	Head of Housing	<a href="#">Locata</a> - available Council properties advertised on Locata website	ISA - use of passwords by applicants - no access to data by other Kent authorities - authorised users only
External Services	Head of Housing	<a href="#">BPHA</a> - home ownership and rental options	Use of password by applicants and BPHA only
Internal Services	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	<a href="#">CCTV</a> – maintenance and administration	A key part of the Council's security setup

# HOUSING POLICY DEVELOPMENT - 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 2017 DPA requirements?	Marketing	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 and tenants,	1.Council department(s) 2.Ombudsman 3. Homebuy Agent for Kent (BPHA)	N/A	N/A	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing -  Kent & Medway Information Sharing Agreement  Kent home Choice Partnership Protocol (for Locata)	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  KMISA - compliant  Kent home Choice Partnership Protocol) – being reviewed	N/A	YES – High – Score 9

# HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>1</sup>	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	<b>Policies/Strategies</b> on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>The process for applying for specialist accommodation in housing schemes. (successful &amp; unsuccessful applications)</b> - forms and supporting material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - racial or ethnic origin, state of health etc.,	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	<b>The process for managing the tenancy of an individual</b> - correspondence and information provided by other agencies relating to special needs of current tenant	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - health data	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	External Services	N/A

<sup>1</sup> 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



# HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>Garage rental applications</b> - case file	N/A	6 years from expiry of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy &/or electronic in Idox	N/A
External Services	Head of Housing	<b>Court Orders</b> – leaseholders case files	N/A	Life of tenancy	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 - offences	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996  Legal claims	Paper copy &/or electronic in Idox	N/A
Internal/External Services	Head of Housing	<b>Procurement</b> - relating to Out of Office Hours and Telecare services	N/A	6 years from expiry of contract	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	No	N/A	Paper copy and/or electronic	N/A
External Services	Head of Housing	<b>Resident meetings</b> - minutes	N/A	1 year from date of meeting	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>Leasehold tenancies</b> - – customer comments--case file material – instructions etc.	N/A	6 years from expiry of tenancy (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, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – racial/ethnic origin, health data etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	N/A

# HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>Special Needs' Referrals</b> - correspondence and information provided by the tenant passed to other agencies relating to their special needs	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, marital status, NI number, employment status, preferred language, financial data	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes – health data, religion, sexual orientation, racial/ethnic origin	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy & electronic	N/A
External Services	Head of Housing	<b>Correspondence (general)</b> – letters, emails memos etc.	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 the legislation detailed in this IAR	No	N/A	Electronic	N/A
External Services	Head of Housing	<b>Councillor Enquiries</b>	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	<b>Right-to buys</b> - case file material including applications, plans etc., credit reference agency searches	N/A	2 years from date of sale	Common Practice	Secure Disposal	Yes - - (identifiable natural persons only) – name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985	No	Substantial public interest pursuant to Housing Act 1985	Paper copy &/or electronic in Idox	N/A

# HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - complaints received and outcomes – case file material	N/A	Lifetime of tenancy or Lease 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	<b>Dartford Private Leasing Scheme Lease Agreements</b> – Landlord details	N/A	2 years from end of lease	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details	Public interest task pursuant to: Housing Act 1985 Housing Act 1996 Commonhold and Leasehold Reform Act 2002	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>Community Centres Bookings</b> – application forms etc.	N/A	2 years from end of hire	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) – name, address, contact details, financial data	Public interest task pursuant to Housing Act 1985	No	N/A	Paper copy & electronic	N/A
External Services	Head of Housing	<b>Performance Indicators</b> –relating to the housing schemes & finance function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic on Pentana	N/A
External Services	Head of Housing	<b>Complaints</b> – 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

## HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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 18) -
External Services	Head of Housing	MAPPA <sup>2</sup> /MARAC <sup>3</sup> and Safeguarding Referrals (children & adults at risk) - case file material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation pursuant to: Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes - state of health, 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 electronically in Idox	Yes

<sup>2</sup> Multi-Agency Public Protection Arrangements

<sup>3</sup> Multi- Agency Risk Assessment Conference

# HOUSING SCHEMES LEASEHOLD & FINANCE - INFORMATION ASSET REGISTER 2018

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<b>Idocs/UNIFORM/ Capita Housing and department computers and laptops/internet/intranet</b> –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
Internal Services	Policy & Corporate Support Manager	<b>Pentana</b> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	<b>Idocs/UNIFORM Capita Housing/ Pentana and computers and laptops /internet/intranet</b> – input of data – the housing schemes & finance function	Use of passwords
External Services	Head of Housing	<b>Business recovery</b>	See Business Plan
External Services	Enforcement & Regulatory Services Manager	<b>CCTV</b>	A key part of the Council's security system

# HOUSING SCHEMES LEASEHOLD & FINANCE - 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 –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.	<ol style="list-style-type: none"> <li>1.Council department(s)</li> <li>2.Courts/tribunals etc.</li> <li>3.Housing Associations</li> <li>4.Contractors</li> <li>5.Ombudsman</li> <li>6.Kent County Council (for referrals)</li> <li>7.North West Kent Volunteer Centre</li> <li>8.Kent fire &amp; Rescue Service</li> <li>9.Age Concern</li> <li>10.Appetito</li> <li>11.SAFFA (Soldiers, Sailors, Airmen &amp; Families Association)</li> <li>12.District Nurses</li> <li>13.Impact Team (NHS)</li> <li>14. Mental Health Team (NHS)</li> <li>15.Occupational Therapist (NHS)</li> <li>16.Self-funding care agencies</li> <li>17 Home support cleaners (self funders)a</li> <li>18.Volunteer Bureau</li> <li>19.LoCta (tracing agency)</li> </ol>	N/A)	N/A	<p>Pentana – Cloud based – retention only</p> <p>Secure Waste Disposal - no processing</p> <p>SDC bulk printing – no processing</p> <p>Tunstall Healthcare Ltd (out of hours call centre)r</p> <p>Pinnacle PSG</p> <p>LoCta</p>	<p>Pentana - BS ISO/IEC 27001:2013 compliant</p> <p>Secure Waste Disposal – confidentiality clause in contract</p> <p>SDC bulk printing SLA –includes confidentiality requirements</p> <p>Tunstall Healthcare Ltd – <b>contract terms to be reviewed</b></p> <p>Pinnacle PSG - <b>contract terms to be reviewed</b></p> <p>LocTa (compliant)</p>	N/A	N/A	Yes – high-score 9

# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA <sup>1</sup>	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	<b>Procedure/guidance</b> - on a range of housing matters	Applicable if policy or strategies have privacy implications	Supersedes preceding version	Common Practice	Archive	No	N/A	No	N/A	Electronic	No
External Services	Head of Housing	<b>The process for applying for council housing. (successful &amp; unsuccessful applications)</b> - forms and supporting material (including from external agencies), medical assessment process, joint stock referrals, joint housing panels, needs & risk assessments, assessments for extra care units etc.	N/A	6 years from date of expiry of application if unsuccessful or Lifetime of tenancy if granted. (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, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - – racial or ethnic origin, state of health etc.	Substantial public interest pursuant to Housing Act 1985 Housing Act 1996	Paper copy &/or electronically in Idox	YES -with parental consent
External Services	Head of Housing	<b>Downsize for Cash Scheme-</b> application process	N/A	Permanent	Statutory	Archive	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes– health data	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	YES – with parental consent

<sup>1</sup> 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

# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>The process of awarding tenancies in council housing</b> – case file material including tenancy agreements	N/A	Lifetime of tenancy	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996	Yes - -- racial or Ethnic origin, state of health etc.	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronically in Idox	YES – with parental consent
External Services	Head of Housing	<b>Homelessness</b> – case file material including decisions <b>Temporary Accommodation</b> and relevant documentation <b>Homeless Prevention activity</b> including payments to landlords, loan agreements	N/A	6 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task/ compliance with a legal obligation pursuant to: Housing Act 1996 Homeless Reduction Act 2017	Yes	Substantial public interest pursuant to: Housing Act 1996 Homeless Reduction Act 2017	Paper copy &/or electronic in Idox	YES – with parental consent
External Services	Head of Housing	<b>Dartford Private Sector Leasing Scheme</b> - Including leases and maintenance records, rent accounts	N/A	Lifetime of Tenancy or 6 years from date of file closure	Common Practice	Secure Disposal	Yes (identifiable natural persons only) name, address, contact details, financial data etc.	Public interest task pursuant to: Housing Act 1985 Housing Act 1996 Commonhold and Leasehold Reform Act 2002	Yes - -- racial or ethnic origin, state of health etc.	Substantial public interest pursuant to: Housing Act 1985 Housing Act 1996	Paper copy &/or electronic in Idox	YES – with parental consent



# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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	<b>Housing Ombudsman &amp; Local Government &amp; Social Care Ombudsman</b> - complaints received and outcomes	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 or ethnic origin, state of health etc.	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronically in Idox	N/A
External Services	Head of Housing	<b>Complaints</b> – 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
External Services	Head of Housing	<b>Performance Indicators</b> – relating to the housing options function	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic	N/A
External Services	Head of Housing	<b>General Correspondence</b> – emails. letters memos etc. -	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 legislation referred to in this IAR	No	N/A	Electronic & paper copy	N/A
External Services	Head of Housing	<b>Councillor &amp; MP Enquiries</b>	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

# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA	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 18) -
External Services	Head of Housing	<a href="#">MAPPA<sup>2</sup>/MARAC<sup>3</sup> and Safeguarding Referrals (children &amp; adults at risk)</a> - case file material	N/A	Life of tenancy	Common Practice	Secure Disposal	Yes (identifiable natural persons only) - name, address, contact details	Public interest task/legal obligation pursuant to: Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes - state of health, 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 electronically in Idox	Yes

<sup>2</sup> Multi-Agency Public Protection Arrangements

<sup>3</sup> Multi- Agency Risk Assessment Conference

# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

## TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	<a href="#">Idox/UNIFORM/ Academy and department computers and laptops/internet /intranet</a> –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
Internal Services	Policy & Corporate Support Manager	<a href="#">Pentana</a> – maintenance & administration	BS ISO/IEC 27001:2013 compliant
External Services	Head of Housing	<a href="#">Idox/UNIFORM Academy/Pentana and computers and laptops/ Internet/intranet</a> - - input of data – the landlord & tenant function	Use of passwords
External Services	Head of Housing	<a href="#">Kent Home Choice/Locata</a>	Data Sharing Protocol operated by the KHC Partnership
External Service	Head of Housing	<a href="#">Firmstep</a>	Data Sharing Contract signed. Secure website with password access
Internal Services	I.C.T. Manager	<a href="#">Stay Connected email alerts (DBC website)</a>	Subscriber own password – unsubscribe at any time
External Services	Head of Housing	<a href="#">Disaster recovery</a>	See Business Continuity Plan
External Services	Enforcement & Regulatory Services Manager	<a href="#">CCTV</a> – maintenance and administration	A key part of the Council's security setup

# HOUSING SOLUTIONS - INFORMATION ASSET REGISTER 2018

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

Categories of data subject	Recipients of personal/sensitive data	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 2017 DPA requirements?	Marketing	Profiling	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.Kent Homechoice Partnership 7.Police 8.Socila Services 9.KCC 10.Porchlight 11.YMCA 12.MP 13.Councillors 14.Independent Domestic Violence Advocate 15. Now Medical 16. Firmstep 17. Hub Agencies	N/A	NO	Pentana – Cloud based – retention only  Secure Waste Disposal - no processing  SDC bulk printing – no processing  Kent Homechoice Partnership (KHCP)  Kent & Medway ISA  Porchlight  Independent Reviews Ltd	Pentana - BS ISO/IEC 27001:2013 compliant  Secure Waste Disposal – confidentiality clause in contract  SDC bulk printing SLA  KHCP  KMISA - compliant  Porchlight – to be reviewed  Independent Reviews - to be reviewed	N/A	N/A	YES – High – Score 9