



IPSWICH
BOROUGH COUNCIL

Privacy Notice – Housing Advice

Introduction	<p>The Housing Advice Team at Ipswich Borough Council ('the Council') provides this privacy notice to you to help you understand how we collect, use and protect your Personal Data.</p> <p>When reading this document please note that we use the terms 'Personal Data' and 'Personal Information' interchangeably.</p> <p>The Notice covers the areas of our service directed to individuals whose personal data we process in connection with rough sleeping, homelessness, the provision of interim accommodation and the grant of permanent accommodation in the private sector.</p> <p>For information on the process for securing permanent accommodation with the Council please see our Gateway to Homechoice notice which can be found at www.gatewaytohomechoice.org.uk/PrivacyPolicy The Notice is separate to this one as it is a scheme we operate in partnership with several neighbouring local authorities.</p> <p>For information on how the Council <i>generally</i> processes and protects your personal information please view our Privacy Notice, which can be found at https://www.ipswich.gov.uk/content/privacy-policy.</p> <p>The Data Protection Officer for Ipswich Borough Council is Siobhan Martin, Head of Internal Audit. She can be contacted at dataprotection@ipswich.gov.uk</p>
Terms used in this Notice	<p>Personal Data means any information related to an identified or identifiable living individual- known as a 'Data Subject'. An individual is regarded as identifiable if they can be identified, directly or indirectly from the information.</p> <p>Special Personal Data previously known as 'sensitive personal data', relates to race, ethnic origin, politics, religion, trade union membership, genetic data, biometric data (where used to identify a person), health, sex life or sexual orientation. Special Personal Data is distinct from other 'ordinary' data and requires greater justification for use and greater care when handling it.</p> <p>Records of personal data relating to criminal convictions and offences and allegations are deemed to be as sensitive as the above types of data and should be treated with equal care.</p> <p>Processing means any operation which is performed on information such as. collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or making available, alignment or combination, restriction, erasure or destruction.</p>



IPSWICH
BOROUGH COUNCIL

	<p>Data Controller determines the purposes and means of processing personal data.</p> <p>Data Processor is an individual or entity that processes personal data on behalf of the Data Controller</p>
<p>Who we are and what do we do:</p>	<p>More detail is provided below but, briefly, the Housing Advice team is responsible for:</p> <p>Providing and facilitating support for rough sleepers</p> <p>Determining what duties, the Council owes to individuals who are homeless or threatened with homelessness and the extent of any duty</p> <p>Providing accommodation for people either on an interim or permanent basis –sometimes with the support of private sector landlords</p> <p>The Council is the ‘Data Controller’ for the information which is collected and further processed. This means we are responsible for deciding how we use your information.</p> <p>If you would like more information regarding the services delivered by the Council <i>generally</i>, please visit our website, https://www.ipswich.gov.uk/.</p> <p>On some occasions, the Council and other organisation(s) may jointly decide between us what is to be done with personal data and how it is to be processed. Where this is the case the Council and the other organisation(s) will agree upon their respective legal responsibilities for the proper handling of personal data.</p> <p>As at the date of this Notice the Council jointly processes personal data with :</p> <p>Ipswich Housing Action Group Anglia Care Trust Sanctuary Supported Living SELIG – Ipswich Winter Night Shelter NHS – Norfolk and Suffolk Foundation Trust</p> <p>This is for the purpose of providing services to prevent and relieve homelessness. If you would like to know more about this please let us know.</p>



IPSWICH
BOROUGH COUNCIL

<p>How we lawfully process Personal Data</p>	<p>The law allows us to process your personal data in several potential ways. In the case of Personal Data that is not deemed to be special category or about criminal convictions or offences it is processed in one of the following ways:</p> <ul style="list-style-type: none">a) with your consentb) to take steps with a view to there being a contract between us or to perform the contract itselfc) where the Council needs to comply with any legal obligation placed upon itd) to protect the vital interests of individualse) to enable the Council to undertake a task carried out in the public interest (supporting people in need) or to exercise our official authority <p>Where we collect and use special data, it will be under one of the following lawful bases:</p> <ul style="list-style-type: none">• Article 9.2a: (with your) explicit consent• Article 9.2b- to meet obligations under social protection law - interventions intended to relieve households and individuals of the burden of risks in relation to homelessness and social exclusion• Article 9.2f: exercise or defence of a legal claim by us or where the courts are involved• Article 9.2g: reasons of substantial public interest: to ensure equality of opportunity• Article 9.2g: reasons of substantial public interest: - to enable the Council to exercise its statutory functions• Article 9.2h-provision of social care and management of systems and services <p>The principal legislation that allows us to process your data is the Housing Act 1996 (as amended).</p> <p>Where we process any information relating to criminal convictions or offences (including allegations) we will only do so where the law allows us to.</p>
<p>How the law protects you:</p>	<p>The UK GDPR and the DPA 2018 set out how we can lawfully use personal information. Complying with the law protects individuals from harm and the Council will only ever process your information where we are legally able to.</p>
<p>Our responsibilities</p>	<p>The UK GDPR and the DPA 2018 provide us with our main responsibilities for processing personal data.</p> <p>All personal information provided by you is held securely.</p>



IPSWICH
BOROUGH COUNCIL

	<p>For further information on our responsibilities, please see https://www.ipswich.gov.uk/content/privacy-policy.</p>
Your rights:	<p>The UK GDPR and DPA 2018 provide you with the following rights:</p> <ol style="list-style-type: none">1. The right to be informed2. The right of access3. The right to rectification4. The right to erasure5. The right to restrict processing6. The right to data portability7. The right to object8. Rights in relation to automated decision making9. The right to withdraw consent10. The right to complain <p>Requests in relation to your rights should be directed to the Council. A request can be made verbally but we would prefer for you to do so in writing, by email to dataprotection@ipswich.gov.uk –or (in the case of a request for a copy of your personal data) using the Subject Access Request Online Form. Please note that you can see some of the information that we hold about you by logging into your Gateway account</p> <p>When we receive a request from you in writing, we must normally give you access to everything we have recorded about you. However, we will not let you see any parts of your record which contain:</p> <ol style="list-style-type: none">1. Confidential information about other people2. Information a care professional thinks will cause serious harm to your or someone else’s physical or mental wellbeing; or3. Information that could obstruct a criminal investigation if it were disclosed to you. <p>If you are requesting to view CCTV footage, please visit Making a request to view CCTV.</p> <p>For further information on your rights, please see https://www.ipswich.gov.uk/content/privacy-policy.</p> <p>If you are unhappy with the way the Council has processed your information, please contact dataprotection@ipswich.gov.uk The Council will look into your concerns for you. If after that if you are still</p>



IPSWICH
BOROUGH COUNCIL

	<p>unhappy you may contact the Information Commissioner's Office. Their contact details are available at www.ico.gov.uk</p>
Your responsibilities	<p>You are responsible for making sure you give us accurate and up to date information, and to let us know if any personal information we hold is incorrect.</p>
When do we collect information about you?	<p>We collect information about you from different places such as information received directly from you when you seek assistance from us or when information is passed to the Council by other agencies and public authorities such as other local Councils.</p>
What information do we collect, maintain and use?	<p>Every individual's situation is different. We will only collect and use the information we need.</p> <p>The information which we will collect, maintain and make use of may include:</p> <p>Your name, DOB, Where you are currently residing Address history Contact number, Emergency contact details, NI number, Gender, Nationality, Ethnicity, Physical and mental health information, If you have a learning disability Any offending history Financial information Income including benefits Any difficulty with budgeting Employment details, Details of other agency involvement Who may have referred you to us The reason you need assistance Your housing needs Details of any local connection Any history of rough sleeping Employment status Access to education, employment or training Whether you are within a certain age group (16-25) Whether you are elderly If you are a care leaver If you served in HM Forces If you are a victim of modern slavery If you are being abused or at risk of abuse</p>



IPSWICH
BOROUGH COUNCIL

How do we use your information?

We will be using your information to:

Rough Sleeping

- 1) recognise you as someone who is rough sleeping
- 2) assess your needs for housing, other support and safety.
- 3) to make referrals to agencies/ organisations who can provide housing, other support and ensure you are safe.
- 4) to enable both local and central government to be informed as to the extent of rough sleeping and to monitor the effectiveness of support.

Homelessness

- 1) to receive applications for the Council to determine if it owes a duty and, if so, the extent of that duty. As part of the determination process, we will also usually ask for further information about you from the following organisations, if it is relevant to your application for housing:

- Current landlord –for a reference
- Previous landlords – references
- GP or other healthcare professional – information about your health
- Mental health worker and/or psychiatrist– information about your health
- Probation/Youth Offending Team -information about any offending history
- Police -information about any offending history or about any domestic abuse
- Social care/social worker – information about their involvement with you
- Floating support worker- information about your needs and support provided
- Other support workers- information about your needs and support provided
- Current and/or previous employers

- 2) to facilitate reviews where you are dissatisfied with the outcome of the original decision.

- 3) to deal with any legal claims



IPSWICH
BOROUGH COUNCIL

Interim accommodation (hostels team)

- 1) to accommodate you temporarily pending a full assessment of our duties to you
- 2) to undertake risk assessments before placement of you in temporary accommodation
- 3) to monitor and provide a service to you to ensure that any needs are met whilst you stay in temporary accommodation
- 4) To signpost you to support services or, where there are concerns, make safeguarding referrals.

Lettings

- 1) to put you forward as a prospective tenant with a private sector landlord
- 2) to enter in to an agreement with you and your landlord as regards the tenancy and to guarantee the deposit and rent.

Generally we may use your personal information to investigate any worries or complaints you have about this service; and check the quality of services.

Homelessness Data England Project

The Council is taking part in the above. Its aim is to enable central government to understand more about the causes of homelessness and how well services meet people's needs. They -the Department for Levelling Up, Housing and Communities (DLUHC) want to collect a range of information to improve their understanding of the causes and factors related to homelessness. This will help them improve homelessness services

DLUHC wants to link information about you and others in your household together with other information, including your homelessness application and past and future information on your use of other public services and benefits

Any information you provide will not be used to make any decisions about what benefits you get, services you use, now or in future, or used to identify fraud. It can only be used for research.

IF YOU WISH TO KNOW MORE PLEASE ASK.



IPSWICH
BOROUGH COUNCIL

	<p>We will not use your personal data for purposes other than those set out on this Notice unless we have obtained your consent or for other lawful purposes (e.g. detection and prevention of fraud).</p> <p>Automated processing/profiling:</p> <p>The Housing Advice team does not use your personal data in any automated decision-making or profiling activities</p>
How long do we keep your information?	<p>We will keep your personal information only for as long as we need to. For further information please see our Records Retention Schedule.</p> <p>After this time, your personal information will be deleted from our system</p> <p>You have the right to request that your personal information is deleted at any time, however whether this is possible will depend on the reasons why the data is processed. The Council will consider your request and comply where possible. If it is not possible, we will explain the reasons to you.</p>
Transferring your information overseas	<p>Currently, we do not transfer any personal information outside of the United Kingdom</p>
Data sharing	<p>We may share your personal information with:</p> <p>Rough Sleeping Team</p> <p>Rough Sleeper Outreach and Inreach services Emergency bed providers NHS – Norfolk and Suffolk Foundation Trust (to provide help with any physical or mental health needs)</p> <p>Suffolk Police Street Rangers – Ipswich Central (so that they are aware that you are rough sleeping and in need of support) Health Outreach Turning Point</p> <p>Suffolk County Council</p> <p>Department for Levelling Up, Housing and Communities (DLUHC)- as explained above.</p> <p>Homelessness</p>



IPSWICH
BOROUGH COUNCIL

	<p>Department of Work and Pensions Home Office DLUHC Previous Landlord Other Local Authorities Social care providers Police</p> <p>Interim Accommodation</p> <p>Police Children and Adults services Other (non IBC) temporary accommodation providers Other agencies where there are health/ safeguarding concerns</p> <p>Private Sector lettings</p> <p>Data is shared with Landlords to facilitate the granting of a tenancy</p>
National Fraud Initiative NFI	<p>We may share information provided to us with other bodies responsible for auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud. For further information, see https://www.ipswich.gov.uk/content/privacy-policy..</p>