



IPSWICH  
BOROUGH COUNCIL

## Privacy Notice – Tenancy Services

<b>Introduction</b>	<p>The Tenancy Services Team has provided this privacy notice to help you understand how we collect, use and protect your information whilst we provide you with a Tenancy Management service.</p> <p>The document below will describe how we may collect and process your personal information.</p> <p>The purpose of this document is to clearly acknowledge the Council's responsibilities in relation to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).</p> <p>For information on how we process and protect your personal information please view our Privacy Notice, which can be found at <a href="https://www.ipswich.gov.uk/content/privacy-policy">https://www.ipswich.gov.uk/content/privacy-policy</a>.</p> <p>The Data Protection Officer for Ipswich Borough Council is Siobhan Martin, Audit Partnership Manager and can be contacted at <a href="mailto:dataprotection@ipswich.gov.uk">dataprotection@ipswich.gov.uk</a></p>
<b>Definitions</b>	<p><b>Personal Data</b> means any information related to an identified or identifiable natural (living) person ('<b>data subject</b>') i.e. a person that can be directly or indirectly identified by reference to a name, ID reference, number, email address, location data, or physical, physiological, genetic, mental, economic, cultural or societal identifier.</p> <p><b>Special Category Data</b> previously known as 'sensitive personal data', relates to race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life or sexual orientation.</p> <p>This does not include personal data about criminal offence data as separate rules apply.</p> <p><b>Data Controller</b> determines the purposes and means of processing personal data.</p> <p><b>Data Processor</b> is responsible for any operation which is performed on personal data on behalf of the controller e.g. 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> <p><b>Third Party</b> is someone / somebody who is not the Data Controller, the Data Processor or the Data Subject.</p>



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BOROUGH COUNCIL

<b>Who we are:</b>	<p>The Tenancy Services operational area provides the Landlord housing management function for the Council, which includes three Neighbourhood teams, Sheltered Housing and Support team and a Leasehold team.</p> <p>The team manage over 7,250 general needs Council properties, 554 units of Sheltered Housing accommodation and 388 Leasehold properties.</p> <p>The Council is the ‘data controller’ for the information which is collated and processed. This means we are responsible for deciding how we can use your information. If you want more information regarding the services delivered, please go to our website, <a href="https://www.ipswich.gov.uk/">https://www.ipswich.gov.uk/</a>.</p> <p>The Council regards lawful and correct treatment of personal information as critical to their successful operations, maintaining confidence between the Council and those with whom they carry out business. The Council will ensure that they treat personal information correctly in accordance with the law.</p> <p>Tenancy Services is discretionary.</p> <p>Your personal data is being processed under the following Article 6 lawful bases:</p> <ul style="list-style-type: none"><li>• Consent (Article 6a of UK GDPR)</li><li>• Contract (Article 6b of UK GDPR)</li><li>• Public Task (Article 6e of UK GDPR)</li><li>• Legitimate interest (Article 6f of UK GDPR)</li></ul> <p>Where we collect and use special category data, the lawful bases are:</p> <ul style="list-style-type: none"><li>• Explicit consent</li><li>• Substantial public interest</li></ul> <p>The legislation that allows us to process your data includes:</p> <ul style="list-style-type: none"><li>• The Housing Acts 1988, 1996, 2002, 2004</li><li>• The Homelessness Reduction Act 2017</li><li>• The Landlord and Tenant Act 1987</li><li>• The Localism Act 2011</li><li>• The Protection from Eviction Act 1977</li><li>• The Equality Act 2010</li></ul>



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BOROUGH COUNCIL

<p><b>How the law protects you:</b></p>	<p>The UK GDPR and the DPA 2018 say that we are allowed to use personal information only if we have a proper reason to do so. More information on how the law protects you can be found at <a href="https://www.ipswich.gov.uk/">https://www.ipswich.gov.uk/</a>.</p>
<p><b>Our responsibilities</b></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 and in confidence by us in our computerised and other records system. When we process your personal information, we do so in compliance with the UK GDPR and the DPA 2018.</p> <p>For further information on our responsibilities, please see <a href="https://www.ipswich.gov.uk/content/privacy-policy">https://www.ipswich.gov.uk/content/privacy-policy</a>.</p>
<p><b>Your rights:</b></p>	<p>The UK GDPR and the DPA 2018 provide you with the following rights:</p> <ol style="list-style-type: none"> <li>1. The right to be informed</li> <li>2. The right of access</li> <li>3. The right to rectification</li> <li>4. The right to erasure</li> <li>5. The right to restrict processing</li> <li>6. The right to data portability</li> <li>7. The right to object</li> <li>8. Rights in relation to automated decision making</li> <li>9. The right to withdraw consent</li> <li>10. The right to complain</li> </ol> <p>Requests in relation to your rights with regards to the personal data we hold should be made verbally or in writing to the Data Protection Officer.</p> <p>For further information on your rights, please see <a href="https://www.ipswich.gov.uk/content/privacy-policy">https://www.ipswich.gov.uk/content/privacy-policy</a>.</p>
<p><b>Your responsibilities</b></p>	<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>
<p><b>Where do we collect information about you?</b></p>	<p>We collect information about you from different places, including:</p> <ul style="list-style-type: none"> <li>• Gateway to Homechoice</li> <li>• At tenancy sign-up.</li> <li>• From you during your tenancy.</li> <li>• Partner Agencies: i.e. Adult Community Services, Your GP, Police</li> <li>• Surveys and consultations</li> </ul>



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BOROUGH COUNCIL

<p><b>What information do we maintain?</b></p>	<p>We will only collect and use the minimum information needed.</p> <p>The information about you which we will maintain may include:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• National Insurance number</li><li>• Signature</li><li>• Date of birth</li><li>• Previous address</li><li>• Employment details</li><li>• Emergency contact details</li><li>• Information relating to your tenancy and your interactions with us, including records of advice and support given</li><li>• Rent payment records</li><li>• Benefit information</li><li>• Financial information</li><li>• Details of County Court Judgements</li><li>• Records relating to complaints made and/or received about anti-social behaviour</li><li>• Email address</li><li>• Contact phone numbers</li><li>• Photograph</li><li>• In some cases, disability or medical information</li></ul> <p>Tenant Representative applications only:</p> <ul style="list-style-type: none"><li>• Unspent criminal convictions</li><li>• Referee details</li></ul> <p>Sheltered tenants only:</p> <ul style="list-style-type: none"><li>• Next of kin</li><li>• Support plan</li></ul>
<p><b>How do we use your information?</b></p>	<p>We will be using your information to:</p> <ul style="list-style-type: none"><li>• Process your tenancy application</li><li>• Manage your tenancy</li><li>• Sharing with other agencies where applicable (see data sharing)</li><li>• Assist with benefit and social security claims</li><li>• Report safeguarding issues</li><li>• Service delivery</li><li>• Service improvement and planning</li></ul>



**IPSWICH**  
BOROUGH COUNCIL

	<p>We will not use your personal data for other purposes other than for what it was collated unless we have obtained your consent or for other lawful purposes (e.g. detection and prevention of fraud).</p> <p><b>Automated processing/profiling:</b></p> <p>Some algorithms are used to identify customers at risk of falling into rent arrears, however all decisions are reviewed by humans and not made solely on an automated basis.</p>
<p><b>How long do we keep your information?</b></p>	<p>We will hold your personal information in line with the Council's Retention Policy as follows:</p> <ul style="list-style-type: none"> <li>• Tenancy agreements: 6 years from end of tenancy</li> <li>• Tenancy rent arrears information: 6 years from end of tenancy</li> <li>• Right to Buy applications: 6 years from Right to Buy completion</li> <li>• Sheltered Housing tenant's information: 1 year plus current from end of tenancy</li> <li>• Records relating to Anti-Social Behaviour matters regarding tenants: 6 years plus current from last action on complaint/matter</li> <li>• Spreadsheet of involved tenants (Tenant Participation): until consent withdrawn or tenant is no longer active</li> <li>• Mailing list: Until consent withdrawn</li> <li>• Spreadsheet of tenants who receive alternative format of publications: until consent withdrawn or tenancy ends.</li> <li>• Application form for prospective Tenant Representative: for the duration of the volunteering role, however some information is only used for initial sign-up stage</li> <li>• Tenant photographs: until no longer a tenant of Ipswich Borough Council</li> <li>• Rentsense (an algorithm that enables targeting of support to prevent rent arrears): up to 90 days</li> </ul> <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>
<p><b>Transferring your information overseas</b></p>	<p>Currently, we do not transfer any personal information outside of the European Economic Area (EEA).</p>
<p><b>Data sharing</b></p>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>• Judicial Agencies e.g. Courts</li> <li>• Police</li> </ul>



**IPSWICH**  
BOROUGH COUNCIL

	<ul style="list-style-type: none"><li>• Advisory &amp; Support Services</li><li>• Emergency Services</li><li>• Health Agencies</li><li>• Education Providers</li><li>• Other Local Authorities</li><li>• Immigration Services</li><li>• Government Departments e.g. HMRC, DWP, DCLG</li><li>• Safeguarding Boards</li><li>• Experian – Rental Exchange Scheme</li><li>• MobySoft – RentSense rent arrears management software</li><li>• Contractors providing housing services (e.g. plumbing, electricians, gas operatives etc.) and IT services</li><li>• Elected Councillors and MPs (as your representative)</li><li>• Funding Bodies</li><li>• Valuers</li><li>• Solicitors</li></ul>
<b>National Fraud Initiative NFI</b>	<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 , which can be found at <a href="https://www.ipswich.gov.uk/content/privacy-policy..">https://www.ipswich.gov.uk/content/privacy-policy..</a></p>