

## Housing Allocation (Keyways) Data Sharing Agreement

### 1. Introduction

A Data Sharing Agreement outlines a set of common rules binding on all organisations involved in a data sharing initiative. Adopting this Data Sharing Agreement will enable Kettering Borough Council, Corby Borough Council and the Borough Council of Wellingborough (together “the Parties” and singularly “a Party”) to share personal data in a way that is fair, transparent and in line with the rights and expectations of the people whose information is being shared. It will also reduce the reputational risk, to either Party, caused by the inappropriate or insecure sharing of personal data.

This Data Sharing Agreement complements each Party’s Housing Allocation Policy.

It sets out to clarify the responsibilities of all Parties concerned with the housing allocations process in order to process personal data in line with the General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”) which comes into force in the UK on the 25<sup>th</sup> May 2018 and repeals the Data Protection Act 1998. This will be supplemented by the data protection bill (2017-2019) once this has passed through Parliament and is enacted (together referred to as the “Data Protection Legislation”). Consent to disclose personal data is already sought as part of the application for housing.

### 2. Purpose

The Parties work in partnership with a number of Registered Providers to allocate social housing and selected private rental properties within the respective borough’s through a jointly operated choice-based lettings scheme, known as Keyways.

The benefit of this data sharing initiative is to:

- make the task of applying for social housing for those with housing need as simple as possible – apply once for housing to all three council’s
- Promote mobility between all council areas
- Make best use of stock and reduces rent loss from voids
- Help to prevent of fraud

The aim of this data sharing initiative is to help people with housing need choose where they would like to live and to prevent people from becoming homeless.

### 3. Organisations involved in the data sharing

The Housing Teams at each Party are involved in this data sharing initiative. A separate data sharing agreement has been drawn up for use with Registered Providers and the three Parties. Applicants are advised on applying to Keyways their information will be shared between the three Parties and eligibility/allocation will be determined with regard to their individual Allocations Policies. Being accepted by one of the Keyways partners does not mean automatic eligibility to the other Parties.

#### 4. Data items to be shared

The Housing Register Keyways holds the following data which may be shared:

- Client's identification details including name, date of birth, gender, national insurance number, address, telephone number
- Client's involvement with local groups and activities
- Client's statutory supervision, custody, or institutional care details, if applicable
- Contact details of client's Social Worker, Probation Officer, Community Psychiatric Nurse, or other Agency, if applicable
- Client's Guarantor contact details if client is under 18
- General information regarding the Client to support their application
- Agency Referral Risk Assessment, Pre Sentence Report/Previous Convictions, Psychiatric Care Programme Approach Reports relating to the Client, if applicable
- Name and contact details of Housing Officer of the Council completing the Referral Form

Officer access and authorisation rights to senior officers are in place for highly confidential information, for example Multi Agency Public Protection Arrangements.

#### 5. Basis for sharing

This data sharing initiative is necessary for the Parties to fulfil their duty of Part VI of the Housing Act 1996, as amended.

#### 6. Access and individuals' rights

Any Data Protection Legislation or Freedom of Information Act requests for access to the personal data must be directed to each Party's data protection officer at;

[dpo@kettering.gov.uk](mailto:dpo@kettering.gov.uk)

[dpofficer@corby.gov.uk](mailto:dpofficer@corby.gov.uk)

[info@wellingborough.gov.uk](mailto:info@wellingborough.gov.uk)

#### 7. Information governance

##### 7.1 Constraints on the use of the data

The personal data must be used by the Parties solely for the purpose for which it was provided, i.e. allocating social housing. The personal data must not be disclosed to any other third party, other than Registered Providers, without prior authorisation from the Parties.

##### 7.2 Roles and Responsibilities under this Data Sharing Agreement

The Parties shall endeavour to provide personal data which is accurate, valid, reliable, timely, relevant and complete and processed in compliance with the Data Protection Legislation.

Each Party shall keep the personal data secure and inform each Party together with the Information Commissioner's Office of any security breaches in relation to the personal data within 72 hours of becoming aware of such breach.

### **7.3 Specific Procedures**

The Housing Teams shall retain the personal data electronically in the Keyways system or in a protected area where it can be accessed by only those with a need to access it.

The Parties shall process personal data securely by means of appropriate technical and organisational measures.

Where appropriate, the Parties will look to use measures such as pseudonymisation and encryption.

Each Party's measures must ensure the confidentiality, integrity and availability of their systems and services and the personal data they process within them.

The measures must also enable the Parties to restore access and availability to personal data in a timely manner in the event of a physical or technical incident.

The Parties need to ensure they have appropriate processes in place to test the effectiveness of their measures, and undertake any required improvements.

Any paper documents containing personal data must be stored in an area protected by physical locks (e.g. locked drawer or cabinet) where it can be accessed by only those with a need to access it.

### **7.4 Retention and Disposal**

We will only keep your information for the minimum period necessary. The information outlined in this privacy statement will be kept in line with our Retention Schedules.

## **8. Signatures**

All partners participating in this Data Sharing Agreement must adhere to the 6 Principles of the GDPR set out in Article 5 and the wider principles of the Data Protection Legislation once enacted.

By signing this Data Sharing Agreement, all signatories accept responsibility for its execution and agree to ensure that staff are trained so that requests for personal data and the process of sharing is sufficient to meet the purpose of this Agreement.

Each partner is responsible for ensuring their signatory details are up-to-date.

## **9 Review / Termination of the Data Sharing Agreement**

This Data Sharing Agreement will be reviewed annually or when any party requests a review, if earlier.

The Parties are responsible for including their Registered Providers in a sub agreement to this Agreement and ensuring that they understand their responsibilities as set out in that Agreement.

This Data Sharing Agreement may be terminated by any Party after notifying the other Parties in writing.

**10. Further information**

Any questions concerning this Data Sharing Agreement should be sent to;

Dan Hannam  
Kettering Borough Council  
[DanielHannam@kettering.gov.uk](mailto:DanielHannam@kettering.gov.uk)

Samantha Dickson  
Corby Borough Council  
[Samantha.Dickson@corby.gov.uk](mailto:Samantha.Dickson@corby.gov.uk)

Vicki Jessop  
Borough Council of Wellingborough  
[vjessop@wellingborough.gov.uk](mailto:vjessop@wellingborough.gov.uk)