

Privacy Notice

On behalf of Kettering, Corby and Wellingborough Borough Councils acting through the Keyways Housing Register (each “a Council” and together “the Councils”)

1. Why we collect information about you

- 1.1 We collect information about you to consider and administer your application for housing.
- 1.2 This notice explains what we do with the information that you provide us with, or which is gathered automatically, to ensure you remain informed and in control of your information.

2. How will we use the information we hold about you?

- 2.1 Applicants interested in living in social/affordable housing in any of the three council areas are now registered on one housing register called Keyways.
- 2.2 The information you provide, along with the additional information we gather, will be used to assess whether you are eligible to join Keyways and if approved, your application will be placed in a band depending on your circumstances. Your data is shared between the 3 partner Councils for nomination purposes.
- 2.3 Your information may also be used for the prevention and detection of crime, including fraud.

3. What is the basis for us to process your data?

- 3.1 The Councils have a legal obligation to provide housing functions under the following laws:
 - Housing Acts 1985; 1996; 2004 & 2006
 - Housing Grants, Construction & Regeneration Act 1996
 - Housing (Homeless Persons) Act 1977
 - Homelessness Act 2002
 - Homelessness Reduction Act 2017
- 3.2 We may also process your information under the following:
 - The prevention / detection of crime, including false representation in accordance with the Fraud Act
 - The General Data Protection Regulation (Regulation (EU) 2016/679) (“GDPR”) which comes into force in the UK on the 25th 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”)
 - All processing of your information will be in compliance with the Data Protection Legislation

4. What information we collect and how this will be processed

- 4.1 The councils deliver services to you. In order to do this in an effective way we will need to collect and use personal information about you.
- 4.2 The Councils sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to the Department of Work and Pensions or other government authorities).
- 4.3 The Housing Register Keyways holds will have the following data:
- Identification details including name, date of birth, gender, national insurance number, address, telephone number
 - Involvement with local groups and activities
 - Contact details of any Social Worker, Probation Officer, Community Psychiatric Nurse, or other Agency, if applicable
 - Guarantor contact details if client is under 18
 - General information regarding the Client to support their application
 - Special Category Information regarding health issues and police record information if applicable
 - Name and contact details of Housing Officer of the Council completing the Referral Form
- 4.4 This data sharing initiative is necessary for the Parties to fulfil their duty of Part VI of the Housing Act 1996, as amended by the Homelessness Act 2002 and the Localism Act 2011.
- 4.5 The EU General Data Protection Regulation requires us as data controllers to comply with a series of data protection principles when processing your data. These principles are there to protect you and they make sure that we:
- Process all personal information lawfully, fairly and in a transparent manner
 - Collect personal information for a specified, explicit and legitimate purpose
 - Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected
 - Ensure the personal information is accurate and up to date
 - Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected
 - Keep your personal information securely using appropriate technical or organisational measures

5. Who we will share your information with

- 5.1 We will only share information with other organisations where it is necessary, either to comply with a legal obligation, or where permitted under Data Protection Legislation, for example where sharing is necessary for us to process your application for housing. We may also share your information if there is a public interest to do so such as the prevention and / or detection of crime, including fraud.

5.2 We may share information that is given to us with other organisations such as:

- The Police
- Community Safety Partnership
- Multi-Agency Risk Assessment Conference
- Multi-Agency Public Protection Arrangements
- Housing Providers e.g. Housing Associations (Registered Providers), Private Landlords, B&Bs, Hotels
- Other Local Authorities
- Other external agencies e.g. Sunflower Centre, Women's Aid, Citizens Advice Bureau

6. Other ways we may use your details

6.1 We may also use your information to contact third parties to verify information you have provided, or gather further information to complete the assessment of your application.

7. How long do we keep your records?

7.1 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.

7.2 All information will be held securely and will be securely destroyed when it is no longer required.

8. Your ability to control your information

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights under the Data Protection Legislation which are as follows:

- The right to be informed via Privacy Notices such as this
- The right of access to any personal information the council holds about you. To request a copy of this information you must make a subject access request in writing, either via a letter to the Data Protection Officer, for the Council with whom you are dealing with. Details of each Councils Data Protection Officers and how to contact them are set out below:

| | |
|----------------|--|
| Kettering | DPO@kettering.gov.uk |
| Corby | dpofficer@corby.gov.uk |
| Wellingborough | info@wellingborough.gov.uk |

- To ensure that we can deal with your request as efficiently as possible you will need to include your current name and address, proof of identity (a copy of your driving licence, passport or two different utility bills that display your name and address), as much detail as possible regarding your request so that we can identify any information we may hold about you, this may include your previous name and address, date of birth and what council service you were involved with.

- From 25th May 2018 the Council will not be charging for making a subject access request. You are entitled to receive a copy of your personal data within 30 calendar days of our receipt of your subject access request.
- The right of rectification, we must correct inaccurate or incomplete data within one month.
- The right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information.
- The right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future.
- The right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form when asked.
- The right to object. You can object to your personal data being used for profiling, direct marketing or research purposes.
- You have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

Please keep in mind that there are exceptions to the rights above and, though we will always respond to your request to exercise your rights, there may be situations where we are unable to do what you have asked. If this is the case we will explain why.

If you would like further information on your rights or wish to exercise them, please write to the Data Protection Officer at the applicable Council.

We can provide you with a template subject access form which includes guidance on how to make your request (and will help us respond more quickly). Please contact us for a copy of this.

9. Complaints

You can complain to the Council(s) directly by contacting their data protection officer using the details set out above. If wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so in accordance with each Borough Councils complaint policy.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.co.uk

For further information:

For details regarding your rights under Data Protection Legislation or how to make a complaint if you think we have mishandled your personal information, please visit:

www.kettering.gov.uk/privacy

www.corby.gov.uk/home/council/data-protection-and-freedom-information/privacy-notice

http://www.wellingborough.gov.uk/info/200031/data_protection_and_freedom_of_information/90/data_protection_act/5