

Camden housing services



How we use and how we look after the information you give us.

This notice explains rights you have under the GDPR (UK General Data Protection Regulation) and the Data Protection Act 2018 (DPA) and explains why we are collecting personal information from you and what we will do with it. For more information see www.camden.gov.uk/privacy

The name and contact details of the Data Controller and the Data Protection Officer

The data controller is the organisation responsible for using, storing and handling the personal information. The data controller is: London Borough of Camden, Judd Street, London, WC1H 9JE. Tel: 020 7974 4444

The council's Data Protection Officer is Andrew Maughan, Borough Solicitor. dpo@camden.gov.uk
Please note he cannot help with housing or tenancy matters.

Why we are asking you for information and what information we use

We are asking for information which is necessary to provide you with housing services and/or to help us manage your tenancy according to your tenancy conditions.

The information that we collect includes the following: Your name, age and the names and ages of other people in your household, your family relationships and your contact details. When we need to make a decision we ask you what we need to know to make it. For example we will ask you about your housing including how long you have lived at your address and if you have any other homes.

The things we take into account when we make decisions about housing are often set out in housing law so we ask for information about the things that the law says we must consider.

We also invite you to let us know if there is anything you would like us to know about when we are managing your tenancy, providing you with services or making decisions. You do not have to tell us sensitive information about your health, family circumstances, support needs or money issues but it can help us provide you with the right services and make good decisions when you do.

When you complain about repairs or anti-social behaviour for example we will use the details you have given us to take the most appropriate action. We will collect the information we need to undertake this work effectively. The data we collect will vary by situation but will include information about you and your family who are affected by matters. If you are a council tenant or visit your data might be given to us by other people so we can deal with issues that they are raising.

We also process your data to allow us to meet our safeguarding duties to vulnerable adults and children.

We process data as needed to combat and prosecute housing and other fraud. More information is available on our privacy notice at www.camden.gov.uk/privacy

Data Sources

Whilst we will obtain most of this information from you, we may also get some of this data from:

- Central Government agencies
- Other Council Departments such as Adults and Childrens' services, Legal Services etc
- Other local authorities
- Landlords or managing agents of properties
- External Solicitors
- Regulators and Ombudsmen
- Councillors and MPs
- Police
- Members of the public who contact us about you

What information must you provide and the consequences of not providing information

It is not mandatory for you to provide any information although if you do not provide information that is necessary to provide you with services we may not be able to provide those services to you.

If we need personal information from you for legal or contractual reasons and you don't provide it this is likely to mean we will be unable to provide you with housing services.

Legal Basis for processing your data:

We use the following legal basis under UK GDPR to process your personal data:

- Article 6(1)(b) Contract where this is necessary for a contract you have with you, or because you have asked us to take specific steps before entering into a contract.
- Article 6(1)(c) the processing is necessary for us to comply with the law
- Article 6(1) (e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

For special category (sensitive) data:

- Article 9(g) Reasons of substantial public interest (with a basis in law) When we use this legal basis we also have to comply with a Data Protection Act 2018 Schedule 1 Part 2 condition, and we apply the following: Para 6. Statutory and government purposes, Para 10. Preventing or detecting unlawful acts, Para 14. Preventing fraud, Para 15. Suspicion of terrorist financing or money laundering
- Article 9 (h) Health or social care (with a basis in law) When we use this legal basis we also have to comply with a Data Protection Act 2018 Schedule 1 Part 1 condition, and we apply the following: Para 1 Employment, social security and social protection and Para 2 Health or social care purposes
- Article 9(f) (f) Legal claims or judicial acts
- Article 9 (2) (j) Archiving, research and statistics. When we use this legal basis we also have to comply with a Data Protection Act 2018 Schedule 1 Part 1 condition, and we apply the following: Para 1 Employment, social security and social protection and Para 4 Research

The underpinning law for these are:

Housing Act 1985, Landlord and Tenant Act 1985, Health and Safety at Work etc Act 1974, Localism Act

2011, Equality Act 2010, Children Acts, Care Act 2014, Homelessness Reduction Act 2017, Fraud Act 2006, Prevention of Social Housing Fraud Act 2013, Climate Change Act 2008 (2050 Target Amendment) Order 2019.

Sharing your personal data

We will only share your data when we have a legal duty or power to do so, and it is necessary and proportionate to share the information. This might be because of a legal duty or to keep a child or a vulnerable adult safe or to allow another council team or someone working for, or on behalf of, the Council to provide services to you. Sometimes we have to share information without asking or telling you because the law says we must or can. We also share information, in the ways data protection law allows, to prevent and detect crime including housing fraud.

The council has a number of Data Sharing Agreements with organisations such as the Police or the NHS to cover sharing that is regular or routine. Ones from 2021 can be accessed here [Data Sharing Agreements \(DSAs\) | Open Data Portal \(camden.gov.uk\)](#)

We may sometimes need to share some of your information with: • Cabinet Office – National Fraud Initiative (NFI) • HM Courts and Tribunals service • Other Camden Council departments to enable them to provide their statutory duties or to meet Council objectives for the betterment of our residents and businesses • Other Local Authorities • Social Housing Associations • Welfare advisors • Employment mentors • Corporate fraud officers • Corporate debt officers • Finance assessment officers (for care package assessments)

We will also share data with external Contractors / Consultants who are carrying out works on the external building including but not limited to communal Door Entry Systems, for repairs and surveys, for fire and asbestos surveys and works and other repairs. Where you are affected by HS2 works your data will be shared with HS2 as needed so they can undertake surveys and remedial works, consultations etc.

We may also share the data from your homes heat meters with external consultants (if you have heat meters fitted) to make energy efficiency improvements to your heating system. This is because of the UK Government's commitments to the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

Where you have agreed to have other energy or damp related devices installed we will share data from them with the suppliers. You will be given more information about schemes when and if you sign up or are included by the council.

We will also pass on your name and contact information to the utilities provider that we used when your home was empty. This is to allow them to bill you and us accurately and correctly. You are free to leave this supplier whenever you wish. If you have left the property and not given a utility provider your new address we will provide these to the utility company if they request it (and it is otherwise reasonable to share) so that they can bill you accurately to avoid the misuse of public funds.

We will share data with Energy Angels who will pass on your name and contact details to your energy suppliers so they have accurate information on who lives at that address, personalising and tailoring products and services for you.

We will share data within the council as is necessary to undertake our council duties. Services might include benefits and council tax, adult services, children's services, business support, parking etc.

Data will be shared with the Local Government and Social Care Ombudsman, the Housing Ombudsman, the Information Commissioner and other regulators as necessary.

We will share data with the police where necessary and proportionate for prevention of crime and ASB and associated areas.

We will make data disclosures to central government as directed by them.

Where necessary information will be shared with elected members such as Councillors or MPs where

they need this to undertake their role, either on your behalf (or a family member) or because you are part of another case.

Information will be shared with external lawyers as necessary for the council to undertake legal action including obtaining advice, civil and criminal matters.

New tenants only. The Ministry of Housing, Communities and Local Government (MHCLG) also collects some information for research and statistical purposes for new tenants. This is about your tenancy, your new home, how your home was let to you and about your household. You cannot be identified from the information we provide to them. The privacy notice from the MHCLG tells you more see www.camden.gov.uk/privacy

KWEST Research

The council may share some of your information with KWEST Research, a research organisation with decades of experience in the social housing sector. Camden Property Services has engaged KWEST to conduct specialised research into customer satisfaction, including surveys with tenants who have reported issues with repairs, experienced antisocial behaviour, or raised a complaint. We will share names, telephone, and addresses of lead tenants and their basic demographic information (age, gender, ethnicity) for Kwest to contact tenants for feedback on how Camden is doing. The purpose of sharing this data is to gain insights into tenant perceptions, which helps us in future planning to ensure a high return on investments and improve quality and satisfaction. KWEST Research uses this information to tailor research solutions, supporting Camden Council's objectives of enhancing service quality for our residents.

The legal basis for sharing this data is Article 6(1)(c) of the UK GDPR, which permits processing when it is necessary for compliance with a legal duty, as the Social Housing Regulation Act 2024 requires that social housing providers engage in improvement activities that include collecting information about tenant dissatisfaction. For special category data (ethnicity) the legal basis is Article 9(2)(g) of the UK GDPR, which allows processing when it is necessary for reasons of substantial public interest, with the Data Protection Act 2018, Schedule 1, Part 2, condition being Paragraph 6 governmental purposes.

RentSense

From April 2024 for a trial period of 6 months, the council will be using RentSense by Mobysoft. This is a system that uses Artificial Intelligence (AI). It uses algorithms to analyse rent transaction data from the tenant's rent account and then presents a prioritised list of arrears cases recommended for contact via a standalone case management portal. This will be used alongside the existing NEC Housing system to manage tenancies.

Rent transaction data from all tenants' (excluding under 18 year olds) rent accounts will be automatically loaded by secure transfer to the system each week. No names, addresses or contact details will be processed – just rent transaction data. Sensitive (special category) data such as equalities data will not be shared with Mobysoft.

RentSense will provide each housing officer with a caseload and a series of actions to work through in a week. This ensures that officers are focusing their attention on cases that need the most priority and reduces time spent on tenants that do not need intervention.

There is no data entry required in the RentSense web portal. Housing officers will tick a box after actioning a case, which removes it from their caseload. They will then input all notes and actions into NEC.

There will be no automated decision-making. It is the human interventions of housing officers which is key. The RentSense recommendations are just a decision-support tool to help them in understanding a

tenant's likely scenario, and other important contextual information should not be discounted.

As part of the pilot, housing officers will need to feedback on the recommendations (with oversight from managers) and use their professional judgement and other case information in the round before deciding whether to action a case or not.

The council will then (outside of RentSense) assess recommended actions against known existing equalities data to consider whether any discriminatory or biased outcomes are being recommended.

A contract with the supplier Mobysoft will be in place with data protection clauses to ensure the safe use and storage of data. The council has undertaken a full Data Protection Impact Assessment and it can be found on our portal [DPIA \(Data Privacy Impact Assessments\) | Open Data Portal \(camden.gov.uk\)](#)

How long will we keep your personal information?

We will keep your personal information for as long as we need it, in order to provide essential housing services to you, this is in line with our corporate retention schedule (the [Council's policy on keeping personal information](#)). There are also legal requirements for why we must hold information about your tenancy.

Automated decision making and profiling

We do not use automated decision making or profiling. If we make a decision about you a council officer will be involved in making that decision.

Transferring your personal information out of the European Union / European Economic Area (EU/EEA):

We will not transfer your information outside the EU/EEA (the EU countries plus a few other countries like Norway and Iceland) unless the country has been certified as 'adequate'.

Your rights:

The law gives you a number of rights to control what and how we use your personal and special category information. There are some exemptions to these rights. If you would like more information on your rights and the exemptions, please see these websites:

- Camden Council <https://www.camden.gov.uk/your-rights>
- The Information Commissioner's Office <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/>

To exercise your rights please use [Data Subject Rights form - Camden Council](#)

Data Protection Complaints

If you have a complaint regarding the data we hold relating to you to enable the Council to fulfil its duties around housing it would be helpful if you contacted us first at DPO@camden.gov.uk to see if we can resolve the problem. You can also make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how the council has handled your personal data. You should contact our Data Protection Officer first to see if this will resolve the problem before going to the ICO. You can contact

the ICO Monday to Friday 9am to 5pm at telephone: 0303 123 1113. Live chat and other information can be found on their website: <https://ico.org.uk/global/contact-us/contact-uspublic/public-advice>

Updating this Privacy Notice We will update the Privacy Notice periodically. It was last updated in September 2024.

