

Privacy Notice – Homelessness Initiatives Service

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

This notice explains your rights under the General Data Protection Regulation (UK GDPR) and the Data Protection Act (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: London Borough of Camden, Judd Street, London, WC1H 9JE, Tel: 020 7974 4444

The name and contact details of the Data Protection Officer: Andrew Maughan, Borough Solicitor, dpo@camden.gov.uk

The data we collect and use:

Personal Data:

Names, Dates of Birth, Addresses and contact details of you and relevant family members, your personal financial information (such as income and benefit status, National Insurance Number) and details around your accommodation and general situation.

Special Category (sensitive) Data:

Data relating to health, disabilities, support needs, nationality, ethnicity, and sexuality where relevant to providing input and support.

Criminal Offence Data:

Data relating to convictions, and/or your status as a victim/survivor and/or perpetrator/alleged perpetrator where these are relevant for the work we undertake with you.

The purpose of the processing:

The information that we request from you is to enable us to provide you with appropriate housing advice and assistance, carry out accurate housing assessments, and so the council can fulfil its legal duties around housing, homelessness, safeguarding, and prevention of fraud and crime.

The legal basis for processing:

- **Personal Data**
- For housing advice and assistance, housing assessments, fulfilling our legal duties around housing and homelessness our legal basis for personal data is article 6(1)(c) (legal duty) and 6(1)(e) (public task) with the underlying laws being Part 6 & Part 7 of the Housing Act 1996 as amended in the Homelessness Act of 2002, and the Homelessness Reduction Act 2017.
- For safeguarding purposes and prevention of fraud and crime our legal basis is article 6(1)(c) (legal duty) and 6(1)(e) (public task) with the underlying laws being the Prevention of Social Housing Fraud Act 2013, Fraud Act 2006, various Children Acts, the Care Act 2014, the Localism Act 2011, Health and Safety at Work etc Act 1974, and various criminal laws.
- **Special category data:**
- For housing advice and assistance, housing assessments, fulfilling our legal duties around housing and homelessness and the LIFT dashboard: art 9 (b) Employment, social security and social protection with the Data Protection Act 2018 schedule 1

part 1 condition being para 1 Employment, social security and social protection; and art 9 (g) Reasons of substantial public interest (with a basis in law) with the Data Protection Act 2018 schedule 1 part 2 condition being para 6 Statutory and government purposes, with the underlying law for both legal basis being Housing Act 1996 as amended in the Homelessness Act of 2002, and the Homelessness Reduction Act 2017, and for the LIFT Dashboard: The Welfare Reform Act 2012 and Social Security (Information-sharing in relation to Welfare Services) Amendment and Prescribed Bodies Regulations 2013

- For safeguarding purposes our legal basis is art 9 (g) Reasons of substantial public interest (with a basis in law) with the Data Protection Act 2018 schedule 1 part 2 condition being para 18. Safeguarding of children and individuals at risk with the underlying laws being the various Children Acts, the Care Act 2014, the Localism Act 2011
- For prevention of fraud and crime our legal basis is art 9 (g) Reasons of substantial public interest with the Data Protection Act 2018 schedule 1 part 2 condition being para 6 Statutory and government purposes and para 10 Preventing or detecting unlawful acts, with the underlying law for both being Housing Act 1996 as amended in the Homelessness Act of 2002, the Prevention of Social Housing Fraud Act 2013, Fraud Act 2006, the Homelessness Reduction Act 2017, and the Localism Act 2011, Health and Safety at Work etc Act 1974, and various criminal laws
- **Criminal offence data:** the article 6 conditions are the same as for personal data, and the Data Protection Act 2018 Schedule conditions are the same as for special category data.
- **The categories of recipients that the council has or will disclose the data to:**
- Internally within the council (eg children's services or council tax) for undertaking our council duties which include the LIFT Dashboard (see paragraph below for more information). More information can be found at www.camden.gov.uk/privacy
- with other councils and Government agencies (for example, the Rent Service, the Home Office, DWP, Job Centre Plus) where necessary for their work. Sharing will be made either under Data Sharing Agreements or ad hoc disclosures where there is a lawful reason to reason to do so.
- With central government to assist its research for the purpose of tackling homelessness. More information can be found at www.camden.gov.uk/privacy
- Current, previous and proposed Partner agencies for purposes of providing accommodation and or support eg Supported accommodation providers, Supported Housing placements/ institutions/refuges/landlords. We will share information about you with current/prospective/previous landlords where necessary for the proper administration of your tenancy for example to allow them to have a proportion of

benefit paid directly to the landlord where there are rent arrears, or to allow landlords to take action for anti-social or illegal behaviour. Those are illustrative examples rather than a definitive list.

- With partner services to verify information and ensure appropriate all-round services are delivered. These may include Health Workers: e.g. GPs, Hospital Consultants or Health Workers, Mental Health Services, Drug and Alcohol treatment agencies; Probation Officers, Offender Managers, Prison Officers, Youth Offending Team, Legal Representatives and/or Police, financial organisations e.g. banks, building societies. The council has a variety of contracts or Data Sharing Agreements for routine disclosures, and ad hoc disclosures will be made where there is a lawful reason to do so.

LIFT Dashboard

The Council's Housing Benefits, Council Tax and Housing Needs teams will share data with each other to identify residents who are at risk of homelessness and contact them with offers of appropriate support such as maximising benefit income and make referrals for debt advice. The information shared are resilience indicators to identify those at risk of homelessness. These resilience indicators include income, economic, disability and benefit status, rent arrears, Council Tax data, pension credit uptake, discretionary housing payments, those impacted by the Local Housing Allowance. It also includes eligibility for free school meals, free healthy start food vouchers, and watersure tariff. Names, addresses, telephone numbers and email addresses will also be shared so that those at risk of homelessness can be identified and contacted.

Whether the council will transfer their data out of the EU/EEA.

We will not transfer your Personal Data outside the EU/EEA.

How long we keep your data:

Data provided as part of your homeless application will be retained for no less than 6 years after closure of the application or ending of temporary accommodation. If the data forms part of your housing register application the information will be retained whilst the application is live or 6 years after its closure. If you are rehoused into a Council property the data will be retained as part of the tenancy record.

Your Data Subject Rights

You have the right to request a copy of the information we hold about you, the right to ask us to rectify, erase or restrict processing of your data, the right to ask for data portability, the right to object to automated decision making, and if we are relying on consent the right to withdraw consent at any time. There are some exemptions to these rights. Please see our website [here](#) and the ICO website [here](#) for more information. To exercise rights please use our web form [Your rights - Camden Council](#)

The right to lodge a complaint with a supervisory authority:

You can complain to the Information Commissioner's Office if you are unhappy with how the council has handled your personal data. It would be helpful if you contacted us first at dpo@camden.gov.uk to see if we can resolve the problem. You can contact the ICO at Telephone: 0303 123 1113 , live chat <https://ico.org.uk/global/contact-us/live-chat/> or webform <https://ico.org.uk/global/contact-us/>

Information about whether giving Personal Data is part of a statutory or contractual requirement or obligation.

Personal Data is required so we can process your homeless application correctly. Failure to provide required data in an attempt to mislead the Council in its investigation may be considered an offence under the Housing Act 1996, Prevention of Social Housing Fraud Act 2013, Fraud Act 2006.

Automated decision Making and Profiling.

We are not using automated Decision Making or profiling to process your Personal Data

What information is mandatory for you to provide and the consequences of not providing the information

Providing your identity documentation for all household members and proof of addresses is mandatory for the purposes of processing your application. We may also require supporting information pertaining to any medical conditions and financial records and if you do not do so you may be subject to enforcement action.

Updating:

This Privacy Notice was last substantially updated in February 2022 and minor revisions in March 2024.