

Privacy Notice (How we use your information)

Kirklees Council Housing Services

Choose N Move

This privacy notice relates to the Kirklees Council Housing Management systems and Kirklees Council Housing Register systems. It applies to information provided by post, email, telephone, in person, online forms and the Choose N Move account accessible via the [Choose and Move](#) website.

The categories of information that we collect, process, hold and share include:

- **Personal Information**
Name, address, contact details, DOB for you and members of your household.
Name and contact details of your next of kin and/or any carers
Name and contact details to evidence your local connection to Kirklees Council
- **Characteristics**
Gender.
Ethnicity.
Health/disability information for you and members of your household
Marital status
- **Other**
Benefit entitlements.
Details of your financial situation including bank statements/bills
Photo ID for identification purposes
Details of advocates you have given explicit permission to be involved in your application and/or tenancy
Details of any support services or specialists you access
Where relevant we may also hold copies of other documentation which we need to process your housing register application. This may include but not limited to, evidence of others in the household (e.g. child benefit statements; financial statements; household bills).
Details of your current landlord, your tenure and reasons for moving
Detail of your local connection Kirklees
Any details in required relationship to being Armed Forces, or a bereaved Spouse of Armed Forces
Your reasons for applying for rehousing
Details of any relationships to Cllrs or Staff at Kirklees Council

- Special category personal data that we process includes your gender, ethnicity, disability information, marital status, information on your health and any medical needs.

Why we collect and hold this information

We use this personal data in order to:

- enable us to provide you with the support you need throughout the process
- provide a self-service account for you to access housing services;
- create a customer record that allows us to link details of service requests to your information.
- check your eligibility
- manage your homelessness application, if you make one.
- manage your housing application, if you make one.
- manage your offer of housing, if we (or another provider) make one.
- manage your tenancy, if you accept an offer of housing.
- detect housing fraud
- enable us to carry out specific functions for which we are responsible, including facilitating others to carry out adaptations work on behalf of customers.
- assess the quality of our services – whether we provide it or ask others to do this on our behalf.
- evaluate and improve our performance
- derive statistics and intelligence which inform decisions about future delivery of services.
- provide central government departments with statistical and research information

The lawful basis on which we use this information

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

6(1)(b) We have a contract with you (or you are asking us to take specific steps before entering into a contract)

6(1)(c) We have a legal obligation.

6(1)(e) We need it to perform a public task

The processing is necessary so that we can create an account at your request; or for us to provide a service that you have requested. For homelessness applications, the UK GDPR describes our legal basis as performance of a task carried out in the public interest and for housing applications our processing is necessary for the performance of a contract.

These legal bases are underpinned by acts of legislation that dictate what actions can and should be taken by local authorities. This includes, but may not be limited to

- Housing Act 1996

- Homelessness Reduction Act 2017

Special Category Data

In order to do this work, we also need to collect some special category data. This is personal data that needs more protection because it is sensitive. Under Article 9 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing special category information are:

9(2)(g) Reasons of substantial public interest (with a basis in law)

We may need to collect special categories of personal data in order to assess your eligibility for housing. The relevant specific substantial public interest conditions as set out in Schedule 1 are:

- Statutory and government purpose
- Equality of opportunity or treatment
- Regulatory requirements
- Support for individuals with a particular disability or medical condition.
- Safeguarding of children and individuals at risk where there is an accommodation need

How we store your personal information

Your information is safely stored on Civica Housing Management system, and Abritas Housing Register software, and on Kirklees Council servers and/or databases. The council has a data processing contract with Civica whose systems will hold your data in a secure location in the UK, hosted by trusted partners. They are only permitted to process your data in accordance with our written instructions in order to provide you with the services you need.

We keep your personal data for 7 years after your account was last active. If you become a Council tenant, we will keep your data for as long as you remain a tenant, and for up to 6 years after. At the appropriate time, we will then dispose of your information, using corporately agreed secure processes e.g., manual destruction of paper-based information using agreed confidential waste routes; automatic deletion by the system in which the information is held etc. More information on our retention procedure is available in our Retention Schedule held in [Appendix 1 of the Housing Services Privacy Notice](#).

Automated processing

We use software systems to analyse your application and assess your priority banding. We also use an automated system to rank bids for properties according to priority. If you believe your priority banding or ranking is wrong, you can ask us to check it manually.

Who we may share your information with

We may sometimes share the information we have collected about you where it is necessary, lawful and fair to do so. In each case we will only share the minimum amount of information, only when required, for the following reasons:

- To perform and discharge the Council's statutory duties in relation to homelessness, the housing register and compliance with housing standards including the provision of temporary accommodation.
- To enable the Council to deliver and discharge its landlord's functions for the provision of management and maintenance services to extra care and general needs housing in Kirklees Council's Housing Revenue Account pursuant to the Government's Private Finance Initiative.
- To safeguard vulnerable children and young people or adults at risk.
- Where there is deemed to be a safety or safeguarding risk to staff or others or for circumstances where MAPPA is in place, it has been determined as appropriate by the primary offender management personnel.
- To manage local authority performance.
- To administer and allocate funding.
- To identify and encourage good practice.

We may share this information with:

- Other services within Kirklees Council including (but not limited to) Adult Social Care; Children's Services; Customer and Exchequer; Legal Services; teams with the Communities Service; internal audit; Kirklees Direct. National government department e.g. Department for Levelling Up, Housing and Communities.
- If your household has entered a new social housing tenancy, social housing providers will share your personal information to the DLUHC (Department for Levelling up, Housing and Communities) for CORE (Continuous Recording of Lettings and Sales in Social Housing in England) reporting. More information on how they use and manage your data can be found on their website here [CORE - CORE - Home \(communities.gov.uk\)](#)
- If you bid for homes managed by landlords other than Kirklees Council we will pass your details to that landlord so that they can manage any offer of housing. If you become a tenant of that landlord, your application information will remain on the housing register system. Any information your landlord then requires from you will be processed in line with their privacy notice and procedures.
- Other partners including (but not limited to) health services; the police; fire service; probation services; HM Courts and Tribunals Service; other local authorities; private sector landlords, letting agents or other accommodation providers (including temporary accommodation).

Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

You have the right:

- to be informed if we are processing your personal data and how it is managed
- to request a copy of the information that we hold about you;
- to correct data that we hold about you that is inaccurate or incomplete;
- where certain conditions apply to have a right to restrict the processing;
- in some circumstances, to have the data we hold about you transferred to another organisation;
- to ask us to reconsider any automated decisions;
- to complain if we refuse a request you may make using these rights and you are not happy with our reason.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at data.protection@kirklees.gov.uk if you wish to make a request.

Further information

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#).

If you would like further information about this privacy notice, please contact:
Housing.Solutions@Kirklees.gov.uk

If you have any worries or questions about how your personal data is handled, please contact the Data Protection Officer at DPO@kirklees.gov.uk or by ringing 01484 221000.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact the ICO via the ['Contact us' page on their website](#), or by ringing 0303 123 1113.