

# Privacy Notice (How we use your information)

## Homes & Neighbourhoods Total Assist

We are trialling a system whereby if you contact us to report a repair to your home, we may ask if you would be happy to have a live video chat with an engineer. You will be sent a link via email or text to a live video chat which will, in some cases, enable the engineer to remotely diagnose the fault and work with you to resolve the problem over the phone, without the need to visit your home. It is hoped this will provide a quicker response and resolve the issue there and then. If you would prefer not to use the video chat function, arrangements will be made for the engineer to attend your property in person.

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

We will hold personal information about you such as, your name, date of birth, address and contact details (including telephone number(s) and email addresses).

With video link communication, although it is not our intention to do so, we may also inadvertently capture sensitive and special category personal data along with an inference of information such as:

- household members visual appearance, gender, nationality, marital status, race, ethnicity and religion
- details of where household members work and or which school the household children attend
- information relating to household members physical and mental health medical needs
- images of the tenant, household and extended family or friends along with any visitors within the home environment
- the property content including photographs, personal taste and interests and any items of value or assets that it possesses including vehicles
- audio of personal communications between the household including personal conversations carried out from within the household with voluntary information, opinions and expressions shared within those conversations
- visual observations of the household within private space from recording of images and sound
- recordings of an inappropriate nature, incident exposure, household disagreements and arguments, violence or abusive behaviour
- audio and recording of external affairs which may be taking place in the street, garden or neighbouring properties

## Why we collect and hold this information

We require your personal information to provide assistance regarding housing repair requests and meeting our obligations regarding property maintenance. Scenarios which may benefit from the use of a Remote Assistance video link communication include to:

- triage emergency repair requests to establish if a visit is required
- provide imminent support and advice to tenant without the need for a home visit
- establish repair requests where imminent support and advice would benefit
- conduct surveys and provisions for work planning and materials without the need for home visit
- provide support from managers to operatives that are in the field conducting repairs within your home
- support managers to assess work progress and job satisfaction levels

## 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)(a) Your Consent.** Your consent will be sought to proceed with a video call as a method of diagnosing and/or addressing the problem complained of. **You are able to remove your consent at any time. You can do this by contacting [gas.flint@kirklees.gov.uk](mailto:gas.flint@kirklees.gov.uk)**

**6(1)(e) We need it to perform a public task.** Repairs are being carried out under our duty to maintain houses.

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

In order to do this work, we may also inadvertently 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)(a) Your explicit consent.** If you choose to tell us sensitive personal information during a call e.g. about your health, we will process that (if it is necessary for the purposes of facilitating the work) using your explicit consent. **You are able to remove your consent at any time. You can do this by contacting [gas.flint@kirklees.gov.uk](mailto:gas.flint@kirklees.gov.uk)**

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

## How we store your personal information

Your information is safely stored on Microsoft Azure and Amazon Web Services, within UK data centres.

We keep recordings for up to four weeks. We will then dispose of your information by deleting the recording from the data centre.

## 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.

- Your information may be disclosed to trusted third parties such as contractors if they are carrying out repairs and maintenance on our behalf.
- Video recordings that inadvertently highlight a safeguarding concern may be shared with appropriate bodies as part of our safeguarding obligations.

We do not share personal information about you with anyone else without consent unless the law and our policies allow us to do so.

## 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 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](mailto: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: **gas.flint@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](mailto: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.