

Privacy Notice (How we use your information)

Tenancy Enablement Team (TET)

Homes & Neighbourhood

Homes and Neighbourhood (HN) is responsible for the management and maintenance of the Council's C22,000 council housing stock and we are committed to supporting tenants and their household members in sustaining their tenancies.

The Tenancy Enablement Team, consisting of Tenancy Sustainment, Money Advice and Safeguarding Officers and based within Housing Management & Partnership (HMP) service, offers housing related support for adults and families to support individuals to either set up or maintain their own tenancies and continue living independently in the community.

Achieved through taking a person-centred approach striving to deliver consistent support, undertaking holistic assessments, and ensuring support plans are personalised and tailored to individuals. Providing practical advice through a named officer, who will liaise with other HN teams alongside wider council services and external agencies to ensure an appropriate package of support is in place, which may require making relevant referrals for support.

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

- Name
- Date of birth
- Address
- Telephone Number
- Email address
- Assessment information including personal circumstances to enable assessment of eligibility for services
- Financial information
- Household information
- Relevant medical information
- Social care needs

Characteristics such as:

- Gender,
- Ethnicity
- Disability
- National Insurance number

- Language
- Religion

Why we collect and hold this information:

We use this personal data in order to:

- Enable us to carry out specific functions for which we are responsible
- Provide the most effective support that we can
- Understand all the issues and barriers affecting our tenants
- Target help and support to those who need it most
- Co-ordinate and deliver services for tenant and household members in Kirklees
- Evaluate and improve our performance and the services we offer

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)(e) We need it to perform a public task.

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:

The Local Government Act 2000.

Article 9: 2(g) Substantial public interest.

Processing is necessary for reasons of substantial public interest, on the basis of Union or domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

On very rare occasions, we may also need to share your data in emergency situations and the lawful basis we would rely on is that:

6(1)(d) We have a vital interest

This lawful basis would only ever be used in a potentially life-threatening situation, and we weren't able to gain your consent at that point to share your information with emergency services. We would never rely on this lawful basis to collect or store your personal information.

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:

If we collect any Special category data (more sensitive data, such as your ethnicity or health), we will do this under **Article 9(2)(b)** – UK GDPR matters of employment, social security and social protection and part 1 of Schedule 1 to the DPA 2018.

Para 2 Health or Social Care Purposes

(1) This condition is met if the processing is necessary for health or social care purposes.

(2) In this paragraph "health or social care purposes" means the purposes of -

(b) the assessment of the working capacity of an employee

Article 10

The DPA 2018 will provide a lawful basis to process criminal offence data
Safeguarding of children and of individuals at risk

18(1) This condition is met if—

(b) the individual is—

(i) aged under 18, or

(ii) aged 18 or over and at risk,

(d) the processing is necessary for reasons of substantial public interest.

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:

- Part 6 and Part 7 of the Housing Act 1996
- Homelessness Act 2002
- Housing Act 2004
- Homelessness Reduction Act 2017
- Care Act 2014
- Children and Families Act 2014
- Housing Act 1985, section 27
- Section 17, Children Act, 1989 and 2004
- Equality Act 2005 and 2010

How we store your personal information

Your information is safely stored on Kirklees Council's secure network drives.

We will keep this information for a period of 7 years after you have stopped receiving our support services. We will then dispose of your information by deleting all digital records and safely disposing of any written documents via Kirklees confidential waste.

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. We routinely share this information with;

- External organisations that are offering relevant support you may need – counselling services, health services, local welfare provision, prevention services
- Organisations providing funding – to evidence your eligibility
- Training organisations – when a referral is required
- To safeguard vulnerable children and young people or adults at risk – Children and Adult Social Care
- Statutory agencies such as Police and Probation Services
- Other services within Kirklees Council
- The local Government Ombudsman who investigate complaints

With your agreement we may work with and therefore share data with other organisations to support you, this will be dependent upon your individual requirements.

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 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: TenancysupportHandN@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.