

Privacy Notice – Homelessness Data England Project

Our Commitment to Your Privacy

As part of our commitment to protecting your information, we have updated our Privacy Notices to explain how we collect, store and handle your personal data.

We have always been careful to protect your information, but this is part of our ongoing commitment to be transparent about how we use your information and keep it safe. This will also give you more clarity over how your information is being managed.

Through our privacy notice, we have addressed the new standards introduced by the data protection laws known as the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

Who we are

North Kesteven District Council is registered with the Information Commissioner's Office (ICO) as a 'data controller' under Z5680267. The Council is working with the Department for Levelling Up, Housing and Communities (DLUHC), as part of the Homelessness Data England Project, to improve the service and provide support to people who are homeless, or threatened with homelessness, and people housed in an emergency as a result of Covid-19. This will involve the sharing of information and personal data and will help DLUHC improve homelessness services. However, your information will be kept safe and confidential and handled with care and in accordance with the law.

What information do we collect

We collect name, date of birth, gender, last known address, and national insurance number (if known). In addition, we collect information about how you have become homeless (or threatened with homelessness), your housing history, your experiences of homelessness, your support needs, whether you have spent time in local authority care, your current employment status and the things you may need help and support with.

However, any information you provide will not be used to make any decisions about what benefits you get, services you use, now or in future, or used to identify fraud. It can only be used for research.

To legally share data for this research, local authorities will be relying on Section 179 of the Housing Act 1996, Section 1 of the Localism Act 2011 and powers under section 111 Local Government Act 1972. To legally share data for this research, DLUHC will rely on common law powers.

Under the UK GDPR, the lawful bases relied on for processing your personal information are:

- GDPR Article 6(1)(e) – Performance of a task in the public interest or for official functions, and the task or function has a clear basis in law (in particular to support households that are homeless, or at risk of being homeless, through furthering the understanding of repeat homelessness, the success of prevention activities, the outcomes of people in receipt of homelessness services, and the causes and factors associated with homelessness).

When special category data is collected, the following lawful bases are relied on:

- GDPR Articles 9(2)(j) and 89(1), as supplemented by DPA 2018 Sections 10(2) and 19 and Schedule 1, Part 1, Paragraph 4(a) – processing is necessary for statistical purposes.
- Article 9(2)(g), as supplemented by DPA 2018 Section 10(3) and Schedule 1, Part 1, Paragraphs 6(1) and (2)(a) – processing is necessary for reasons of substantial public interest.
- To process criminal offence data, the conditions in Article 10 of the UK GDPR and Schedule 1, Part 2, Paragraph 6 of the DPA 2018 will be met.

Why we collect your data

We collect your data as the Council is working with DLUHC as part of the Homelessness Data England Project to improve the understanding of the causes and factors related to homelessness, which will help improve homelessness services.

In addition, the research wants to understand whether:

- Housing services help prevent homelessness
- People return for help and support and/or move regularly
- Existing services and programmes reduce homelessness and rough sleeping in the longer-term
- There are other causes of homelessness and outcomes, such as, poor health
- Understand more about the contact households have with public services.

To do this, DLUHC wants to link information about you and others in your household with other data, including your homelessness application and past and future information on your use of other public services and benefits. However, the information you tell us will only be used for research. Researchers looking at the information on homelessness and data from other departments and agencies will not know whose data they have, as the data will be anonymised (i.e. not include any personal identifiers, such as, name, date of birth, etc and contain only a unique reference number created for the project).

How we collect your data

We collect your data when you contact our homelessness service, and when you make an application. As part of your assessment, you will also be asked questions about:

- Your experiences of homelessness
- Your support needs
- Whether you have spent time in local authority care
- Your current employment status.

When we'll share your data

To carry out research and provide support, this will involve the sharing of information and personal data by the Council. This may include your name, date of birth, gender, last known address, and national insurance number (if known). Information will be linked to existing data already held by DLUHC and other government departments.

As well as DLUHC receiving the personal data, the Office for National Statistics (DLUHC's partner on this project) will keep your personal identifiers and store them securely to track the longer-term outcomes for people who have been homeless, or at risk of homelessness.

Any information you provide will be kept strictly confidential. Your name, date of birth, gender, address and national insurance number will be kept separate from all the other information in a secure, password-protected document on a computer system. You will be assigned a unique reference number, so that even though a researcher will see your information, they will not be able to know it is your data.

The Council do not sell your personal information to anyone and will never share your information for marketing purposes.

We will not be transferring the data outside the European Economic Area or use it for automated decision making, for example, using statistical modelling to decide whether or not to provide services.

Therefore, any information you provide will not be used to make any decisions about what benefits you get, services you use, now or in future, or used to identify fraud. It can only be used for research.

Know your rights

You have many rights regarding your personal data, which include seeing what personal information we hold about you. In addition, you can ask us to correct inaccuracies, remove personal data and restrict the personal information we hold. Where possible we will seek to comply with your request, but we may be required to continue to hold and process information to comply with a legal requirement.

If you want to contact us with regards to your rights, please contact dataprotection@n-kesteven.gov.uk

How do we protect your information

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of personal information.

Personal information you provide will be kept securely and strictly confidential; it will be held separately from all the other information in a secure, password-protected document on a computer system. You will be assigned a unique reference number, so that even though a researcher will see your information, they will not be able to identify you.

As well as DLUHC receiving the personal data, the Office for National Statistics (DLUHC's partner on this project) will keep your personal identifiers and store them securely – this is to track the longer-term outcomes for people who have been homeless or at risk of homelessness.

How long do we keep your information

The DLUHC will retain the information for as long as it is needed for the research with regular five-yearly reviews in place to ensure the data is only retained if required. Once the DLUHC no longer need to hold the data to fulfil its statutory functions, it will be securely deleted.

The Office for National Statistics (DLUHC's partner on this project) will carry out a review every five years to ensure the data is still required. If it is not required, it will be securely deleted.

A pseudonymised version of the data will be retained in the Secure Research Service (SRS) for the purposes of research, however the retention of the pseudonymised data in the Office for National Statistics will be reviewed on an annual basis.

North Kesteven District Council will retain your data for seven years.

Aggregate level results of this research will be published, for example, the characteristics of people who are homeless across England. DLUHC will publish reports on the GOV.UK website, however you will not be identified in any research report.

Where can I get advice and/or make a complaint

If you have any concerns or questions, or would like to make a complaint, regarding data protection matters, please contact our Data Protection Officer at: dataprotection@n-kesteven.gov.uk or by calling 01529 414155.

Please refer to DLUHC's Privacy Notice for further detailed information on the H-CLIC research and how DLUHC will process your personal information. If you have any concerns about how DLUHC is handling your personal information, you can email their Data Protection Officer at: dataprotection@communities.gov.uk

For independent advice and/or to make a complaint about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF.

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit ico.org.uk or email icocasework@ico.org.uk