



# HILLINGDON

LONDON

## DATA PROTECTION PRIVACY NOTICE FOR TENANCY SERVICES

### Why are we providing this Notice to you?

The Council, in its capacity of Data Controller, holds certain information about you ["personal data"] which it needs to process for the purpose of providing Tenancy and related Services. This Notice is designed to give you information about the personal data we hold about you, how we will use it, your rights in relation to it and the safeguards that are in place to protect it.

Further information is contained in the Council's Generic Data Protection Privacy Notice which can be found on its website at: [www.hillingdon.gov.uk/privacy](http://www.hillingdon.gov.uk/privacy)

### What personal data do we hold?

The types of data we hold and process will typically include:

- Occupancy details including full names, the relationship between the occupants, dates of birth, ethnicity, and National Insurance Numbers
- Next of kin details including names, contact numbers and addresses
- Any known underlying vulnerabilities which may affect the way in which we provide services
- Details of other services and support providers who may currently be providing a service to you
- Details of your employer, income and capital details and types of benefit claimed
- A record of your rent payments including your method of payment
- Your bank / building society account details where you pay rent or service charges by direct debit

We obtain some of this data directly from you and we may also obtain it from other sources. Where this is the case, we will set out in this Notice the identity and the contact details of the relevant data controller and also the contact details of their data protection officer, where applicable. We will also identify from which source the personal data originates, and if applicable, whether it came from publicly accessible sources.

We will also let you know the recipients or categories of recipients of the personal data, if any.

## **What is our purpose for processing your personal data?**

In its capacity as landlord it is important for the Council to ensure that the correct people are residing in its limited supply of social housing. We use your personal data as an integral part of our counter-fraud work.

As part of its role in ensuring compliance with tenancy obligations and long-term tenancy sustainment it is important to ensure that vulnerable tenants are appropriately supported. To do this effectively the Council and other support and health related services work together in the best interests of individuals and households who may be at risk of tenancy failure due to a range of underlying needs. Sharing personal data in the context of joint working is important to ensure vulnerable tenants are well supported and benefit from their home for as long as they need it.

Where tenants hold a 'fixed term tenancy' [also known as a 'flexible tenancy'] the Council will need to review the personal circumstances of the tenant and household members towards the end of the tenancy. This is to determine whether the Council should offer a further tenancy, why type of tenancy it should be and the type of property which should be offered.

If we intend to process your personal data for a purpose other than that for which the personal data was collected, we shall provide you details of that other purpose before we start processing your data.

## **What is the legal basis for our use of your personal data?**

- We have obtained your freely given and specific consent and have informed you that you have the right to withdraw it at any time
- We need it in order to perform a contract between the Council and yourself
- We need it to comply with a legal obligation
- We need it to perform a task in the public interest

## **What we do if your personal data is sensitive**

We will only process your sensitive personal data with your consent, unless we can lawfully process it for another reason permitted by law. We will notify you if it is sensitive and as with non-sensitive personal data, you have the right to withdraw your consent to processing at any time by letting us know. Sensitive data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

## **For how long will we hold your personal data**

We will only keep your personal data for as long as we need to in order to fulfil the purpose[s] for which it is collected and for so long afterwards as we consider it may be required to deal with any questions or complaints about the service which we provide to you, unless we elect to retain your data for a longer period in order to comply with our legal and regulatory obligations.

To support the effective management of a Council tenancy and to ensure tenants are well supported we will keep your personal data on your tenancy file and rent account for the duration of your tenancy. Where you are granted a new tenancy of Council owned property in the borough, we will link any previous tenancy file with your new tenancy file as a continuous record of your Council tenancies in Hillingdon Borough.

Where your tenancy comes to an end and you no longer hold a current tenancy in Hillingdon Borough we will retain your tenancy and rent account record for 3 years from the date your tenancy ended. We will retain your rent account record for longer if there are monies owing on your account at the time your tenancy came to an end.

### **Organisations that we may share your personal data with**

The circumstances in which the Council may do this are set out in the Council's Generic Data Protection Privacy Notice.

In order for Tenants to claim Universal Credit the Council will share information with the Department of Work & Pensions [DWP] as part of our role in verifying your claim. We may also approach the DWP and ask them to pay your housing costs direct to us to cover your rental obligations and any arrears. The operation of Universal Credit is set out in provisions within the Welfare Reform Act 2012 and a number of Commencement Orders and Statutory Instruments.

In order to support tenants who may be experiencing difficulties meeting their rent payment obligations the Council share rent account information with a contracted service provider. This provider will process data and share it with the Council so that the Council can contact tenants at the earliest possible opportunity where they may be 'at risk' in the context of meeting their payment obligations. Early identification of 'at risk' tenants enables support interventions to be deployed as part of a preventative approach to income recovery.

If you receive your heating and hot water via a central communal boiler, we may ask a third party to take your energy consumption readings so that you can be accurately charged for the heating and hot water you use. We may also ask a third party to invoice you directly for the heating and hot water you use. If we arrange for a third party to undertake one or both of these functions, we will write to you and inform you who the service provider is and what function they will be carrying out on behalf of the Council.

### **Internal Sharing of Data**

We may share some of your data with other services within the London Borough of Hillingdon. Common examples include:

- Counter Fraud
- Business improvement Delivery (BID)

These services (where required) have a privacy notice detailing the legal basis on which they process the data.

### **What happens if you provide personal data to us because of a statutory or contractual requirement**

We will let you know of your obligation and also let you know of the possible consequences if you fail to provide it.

### **What happens if your personal data is subject to automated decision-making including profiling?**

We will inform you of the existence of this as well as the significance and the envisaged consequences of such processing for yourself.

### **Your rights**

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or [in very limited circumstances] erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline [0303 123 1113].

If you wish to exercise any of these rights, please contact [\*insert name]. You also have the right to lodge a complaint in relation to this Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

### **Updates**

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

## **Contacting us**

Please contact Rod Smith for further information

Rod Smith, Service Manager - Tenancy Services  
Civic Centre 2N/08  
High Street  
Uxbridge  
UB8 1UW  
E-mail: [tenancymanagement@hillingdon.gov.uk](mailto:tenancymanagement@hillingdon.gov.uk)  
Telephone: 01895 556731

## **Statutory Data Protection Officer**

You may also contact our Data Protection Officer for further information:

Glen Egan, Acting Head of Legal Services and Monitoring Officer  
Civic Centre, High Street,  
Uxbridge UB8 1UW

E-mail: [gegan2@hillingdon.gov.uk](mailto:gegan2@hillingdon.gov.uk) Telephone: 01895 277602