



**WOKINGHAM  
BOROUGH COUNCIL**

## **Privacy Notice Housing Service**

This notice, in conjunction with Wokingham Borough Councils overarching privacy statement, explains when as a service we collect personal information, what we use your data for, who has access, who we share it with, and what your rights are.

### **Who are we?**

Housing,  
Wokingham Borough Council,  
Shute End,  
Wokingham,  
Berkshire,  
RG40 1BN

### **What is the lawful basis for processing the information?**

The lawful basis for processing your information is the performance of a public task, in the performance of a contract and by you providing consent. This is as specified by the following legislation:

- Housing Act 1985

Provision of the information is a 'Contractual Requirement' and we may have a legal or contractual obligation to process this information. Without this information, we may be unable to manage your services. For example, we cannot consult with you about changes to your service if we do not hold your contact details. It is also in our legitimate interests to ensure that service delivery meets the needs of our service user and their household. Please speak to us with any concerns.

### **How do we collect information from you?**

Information is collected from you as the service user via online web forms, hard copy documents, e-mail, by telephone or through face-to-face discussion. This information will be collected from either you directly as the data subject, or from a representative acting on your behalf.

The forms that are used to collect this information are; application forms, mutual exchange forms, household information forms, tenancy sustainment officer referral forms, financial assessments, direct debit forms, and tenancy visits or audits.

When you provide information about household members we assume that you do so with their full knowledge and consent. Where enquiries relate to household members, it is in our legitimate interests to know who will be living in our premises to check that accommodation offered is adequate for current and near future needs of the household and to check that household members' needs are being met.

### **What type of information is collected from you?**

The service collects and processes a range of information about you. The information is provided to enable the Housing Service to carry out its duty and functions, provide you with a service, and continue to make service improvements.

We will collect the following information: Surname, Forename, Title, and Date of birth of the people in your household. Address, Postcode, E-mail, Phone number, Transaction history, Bank account details, Financial assessments of your household income and expenditure (where appropriate), and information provided by third parties where it is relevant to your circumstances, for example, information from health professionals.

We may also collect; National insurance number, Race or Ethnic origin, Religious beliefs or other beliefs of a similar nature, Sexual orientation, Physical or mental health conditions. We use this data to ensure services are delivered appropriately and to monitor Equality, Diversity and Inclusion. We will apply additional security and confidentiality measures when processing your sensitive personal information, and will ask for specific informed consent at the time of collecting sensitive personal information (also known as special categories of data).

You will be informed of any other data we collect, that is not listed above, orally or through email at the time of collection of the data.

### **How do we use the information you have provided?**

All information provided is used by Wokingham Borough Council for the purposes of providing you a housing service. This includes:

- Keeping our records up to date to help prevent tenancy fraud and illegal subletting
- Consider any housing application you make, and the housing waiting list
- Provide you with efficient housing services and to manage your tenancy
- Collection of monies owed to us by you, and help via Financial Assessments to improve your financial circumstances
- Responding to enquiries and other matters
- Providing you with updates and keep you informed about other services which may be useful to you
- Analysing statistical data for service development purposes (usually anonymised)

### **Who has access to the information about you?**

Your information is managed by staff employed in the Housing Service. Your information may also be shared with officers from other service areas for assistance with these matters. All personal data is stored securely; we have in place security measures which are intended to ensure, as far as possible, the security and integrity of all personally identifiable information.

Your data is stored securely on our systems and accessed only by authorised officers of Wokingham Borough Council by using their own Username and Password all created in-line with pre-defined user credentials. Personal data is also held in electronic files on the Councils network drives. These are only accessible through personal logon credentials and access privileges to specific drives.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, and any exchanges of information carried out once we are in receipt of your data will be done securely.

Any personal data held in paper format is held in lockable filing storage, and accessed only by authorised officers, as is data held on audio or CD/DVD media. Data may be stored in paper form and is always secured in lockable cabinets when not in use. Access to Council sites is also secure requiring a personal electronic pass (lanyard) to access staff only areas.

## **Who we may share your information with?**

When contacting the Housing Service to gain access to services, your information will be shared with other Council staff to the extent required to provide you with the service you have requested. In most circumstances, we will not share your personal information without your permission. Where the information is of a sensitive nature, for example about your health, we will generally obtain consent from you prior to sharing this information, unless we are required or permitted to share this by law.

However, there may be situations where it is necessary for us to share some of your information with others. Regulators, such as the National Housing Federation and Quality Care Commission, Homes and Community Agency (HCA), organisations that we contract or partner with to provide services to our customers, such as repairs contractors, Wokingham Borough Council owned companies, and debt and money management advisors.

Where the Council engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality, and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

To ensure that information is continued to be held securely and that accuracy is maintained, there will also be instances where our system suppliers will need to access individuals personal information. This will be on a strict need to know basis and all contracts have confidentiality clauses built in.

The Council will not transfer your information to countries outside the European Economic Area (EEA) unless this is necessary, and only to countries which have sufficient safeguards in place to protect information.

Information will be shared internally if required for better performance and efficiency of Council services and the welfare of individuals.

Wokingham Borough Council may also share personal information with the police, utility companies, and other local authorities under Article 23 of the General Data Protection Regulations in order to prevent or detect crime, the apprehension of offenders, the collection of tax, duty or to pursue any outstanding revenues.

## **How long do we store your information?**

The duration that the Council will hold information, and what happens at the end of that period, are as described within the Councils corporate retention schedule available on our website: [www.wokingham.gov.uk/council-and-meetings/information-and-data-protection/privacy-statement](http://www.wokingham.gov.uk/council-and-meetings/information-and-data-protection/privacy-statement)

## **Does the service utilise automated decision-making?**

There are some occasions where our systems are set up to use pre-programmed criteria to make automated decisions about you, for example, determining your position on a housing waiting list or eligibility for a mutual exchange. You have a right to challenge the validity of any decisions made this way. You may also ask us not to process your information in this way.