

# GLOUCESTER CITY HOMES

## FAIR PROCESSING NOTICE - HOMELESS ACCOMMODATION SERVICE (P3)

### INTRODUCTION.

Gloucester City Homes is committed to protecting and respecting your privacy. This Fair Processing Notice (together with our terms of Licence) and any other documents referred to on it including our Privacy section on our website, sets out the basis by which any personal data we collect from you, or that you provide to us, will be processed by us.

All Gloucester City Homes Data Protection and Privacy information is displayed via the following website:

<https://www.gch.co.uk/privacy>

Please read the following carefully to understand our approach and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Legislation, the data controller is:

**Gloucester City Homes,**  
Railway House,  
Bruton Way,  
Gloucester.  
GL1 1 DG.

We are a Registered Tier 1 Data Controller, our registration number is ZA127324, and have appointed a Data Protection Officer.

The following information is the **Fair Processing Notice for Licence Agreements for Gloucester City Homes Homeless Accommodation Services where the individual is supported by P3 Charity providing support to complex homeless individuals**

Gloucester City Homes is a partner organisation with the local statutory Housing Authority (Gloucester City Council) in the provisions of Homelessness related accommodation and Housing Management Services, P3 Charity providing Personal Support Services to the Individual as part of a multi-agency initiative aimed to reduce long term homelessness.

The Fair Processing Notice is designed to inform you of the personal data processing undertaken. It is important to know that there are legal and regulatory requirements towards the information we collect and process. The legal obligations we are required to operate by require that we process, retain, and share information.

Gloucester City Homes is committed to good data governance and accountability and we regularly review and audit our Data Protection procedures and processes. We are working towards sector best practice in Data Protection and Information Privacy. To support this, Gloucester City Homes considers Data Protection and Privacy an important element to our organisation's day to day working practices.

As a result of this, Gloucester City Homes may enhance or change our Data Protection and Privacy Notices and the information we provide about our Data Processing activities from time to time to reflect this.



### KEY INFORMATION ABOUT OUR PROCESSING.

The processing of Personal Information is done so to manage and fulfil the duties of a Homeless Accommodation Licence Agreement held by both parties. The Licence Agreement is a legal contract and is made under the provisions of the Housing Act 1988 and as amended by the Housing Act 1996. Gloucester City Homes is a Registered Provider of Social Housing. Our Lawful Basis of Processing Personal Information is **Contract**.

A referral is made by the Housing Authority acting in the interests of an individual. The referral information is processed subject to conditions issued, with partnership with the P3 Charity. Due to the nature of the Accommodation Service, Personal Information will be shared to the Housing Services and Benefits Services of the Local Authority, as well as for the purposes of assisting the individual out of a homeless situation.

#### The Categories of Personal Data processed are:

Licence Holder (prospective/current/past) (and where applicable household members)

Every individual is different, and information will be collected that is necessary to the purpose. A full detailed list of Personal Data processed is available on request and an illustrative example highlighting the types of information processed includes but is not limited to:

- Licence Holder's Name.
- Licence Holder's Housing history details.
- Address and Contact Details.
- Personal Contacts.
- Next of Kin.
- Instructions for Service and Access
- Household make up including pets
- Medical or Health Information
- Criminal Information
- Mobility and Communication considerations.
- Benefits and Payment Details.
- Social Worker(s) Contact Details
- Support Worker(s) Contact Details.
- GP and NHS Service Contact Details.
- Whether the Individual is pregnant. (Health Condition)
- Whether the individual is fleeing Domestic Violence.
- Whether the individual has served in HM Forces.
- Whether the individual has been placed into "care" before or as a minor.
- If applicable, and if relevant to the individual - Probations Service and Contact.
- If applicable, and if relevant to the individual - CGL (Drug and Alcohol Services) Contact
- Criminal Convictions including whether the individual has been convicted of Schedule 1 or 2 offences.



# GLOUCESTER CITY HOMES

## FAIR PROCESSING NOTICE - HOMELESS ACCOMMODATION SERVICE (P3)

We process Special Data Types such as health and medical conditions including criminal information by your consent. This information is required and is necessary for Service, Duty of Care and Personal Safety reasons.

We may record and share Duty of Care/Safeguarding information for the wellbeing and safety of our residents, staff and agents.

Personal Information is not shared internationally or to any third countries.

Due consideration is given to the data collected and the need to provide a professional emergency response service to any individual who may fall or seek assistance.

As part of the National Tenancy Fraud Initiative we will take a photograph of all tenants which will be retained within our Housing Management System. In the event that you cause tenancy fraud, benefit fraud, anti-social behaviour or domestic violence, we will use the photograph to help us in our investigations into criminal activity and will share it with the Police or others who are also investigating such activity.

You should understand that it is an offence to give false information or to withhold information. If done so, housing may be refused or any Licence granted, revoked (Ground 17 Schedule 2 of the Housing Act 1988).



### OUR PURPOSE FOR COLLECTING DATA.

The processing of Personal Information is done so to manage and fulfil the duties of a Homeless Accommodation Licence Agreement held by both parties.

### Sources of Data

Personal Information relating to an individual being considered for Homeless Accommodation is passed to GCH by the local housing authority. Subject to conditions a Licence application is processed and granted. The Data Subject applies for and signs the Licence Agreement with Gloucester City Homes.

From time to time we may operate CCTV / sound recording and / or use photography to capture evidence of breach of Licence, alleged anti-social behaviour or crime. We may also take photographs at our events, at our properties and in our communities to use for general marketing and publicity. We may receive information about you from third parties including but not limited to:

- Councils or Government bodies
- Police, welfare or support organisations, dealing with you including information provided by NHS or Adult Social Care professionals
- Councillors, MPs or other representatives acting on your behalf/instruction.

- Family members, Next of Kin (NOK) or others with Power of Attorney (POA)
- Other Housing Providers
- Referring partners, or the public.
- Agents, Contractors and Trusted Partners.

### Our Legal Basis of Processing Personal Data.

We collect and process Personal Information to provide a service and so the lawful basis of processing Personal Information is **Contract**. The Licence Agreement is a legal contract which both parties agree to. You may be under an obligation to provide information as part of this contract is drawn from the provisions of the Housing Act 1988, and as amended by the Housing Act 1996.

We share information with our agents and suppliers under the basis of **Contract** and by our **Legitimate Interests**.

### Information shared with P3 charity is supported by an Information Sharing Agreement.

This may include retaining and sharing information to keep our agents and staff safe from harm or to ensure you are provided with the right level of service or support.

It is important to understand that the provision of Gloucester City Homes' Homeless Accommodation Service is done to support the obligations and duties of the following legislation.

- Homeless Act 2002
- Having access to meaningful help from the Homelessness Reduction Act 2017
- Housing Act 1988 Amended by the 1996 Act
- Section 7 of the Housing Act 1998 Act



### THE PROCESSING OF DATA.

The information we require from Licence holders includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number.
- Contact details (e.g. phone(s), e-mail, correspondence address).
- Details of next of kin and / or anyone authorised to act on your behalf if applicable.
- Basic details (name and date of birth) of all household residents.
- Proof of housing eligibility, any interest or equity in other property.
- Other personal information that will vary on a case by case basis to help us to provide you with support or resolve breach of Licence, alleged anti-social behavior or fraud.
- Incomes and outgoings;
- Bank details

# GLOUCESTER CITY HOMES

## FAIR PROCESSING NOTICE - HOMELESS ACCOMMODATION SERVICE (P3)

- Address, including previous and forwarding addresses
- Employment details

This list is not exhaustive – but highlights the type of personal information we need to provide a service meeting our social, legal, regulatory and organisational requirements.

The information we may collect from you may include information about disabilities or information about vulnerabilities, which we use to tailor our service to better meet your particular circumstances and needs. We may use this information for safeguarding our staff, residents or contractors.

If you do not provide this information then we may not be able to provide all our services to you, and if as a Licence or prospective Licence holder, ultimately you may not be able to hold a Licence with us. We will also be told about payments you make to us and we may receive information from others about you, e.g. in the event of complaints or alleged breaches of your tenancy.

This includes information provided at the time of registering, subscribing to our service, and, if and when you contact us we may also keep a record of that correspondence. All calls are recorded for monitoring, legal, operational performance and training purposes.

We may also ask you directly or via our agents and trusted partners to complete surveys and participate in market research projects that we use for research purposes, although you do not have to respond to them.

We process details of transactions you carry out through our site and the service we provide.

We process details of your visits to our site and the resources that you access.

We collect the information that we deem necessary to discharge the duties of the contract obligation (Licence Agreement) we have entered into, or to support of legal regulatory or legitimate interests.

We process Special Data (as defined by the GDPR Article 9 and/or Article 10 Protected Data Types) as part our duties as a Registered Provider of Social Housing and in pursuit of the Tenancy Agreement. Provision of this information is with your Consent, supported by the contractual obligations from the use of the Social Housing Tenancy Agreement.

There are lots of legal reasons why we need to collect and use your personal information. Sometimes it is required by law and its use is necessary to deliver a service. This will include carrying out our regulatory, licensing and enforcement roles and providing a wide range of Gloucester City Homes' services.

Personal data we hold about you will be processed for one or more of the following reasons:

- the processing is necessary in order for us to comply with our obligations under a contract between you and us, or because you have asked us to take specific steps before entering into a contract with you;
- the processing is necessary for us to comply with a legal obligation;
- the processing is necessary for our legitimate interests (or the legitimate interests of a third party) unless your interests in data privacy and security override our legitimate interests.
- you have consented to the processing for the specific purposes described in this notice;

The systems employed to manage and process data connected to this process have been reviewed for compliance to Data Protection Legislation and other Privacy related laws.



### WHO HAS ACCESS TO YOUR DATA?

Gloucester City Homes staff have access to your data to provide services and manage your account and Licence Agreement. We operate information security procedures and practices to safeguard your data and access to our services may require a successful validation of your identity by the use of passwords or your National Insurance Number or other security measures. We ensure our staff and agents are trained and aware of Data Protection and Privacy concerns, supported by organisational obligation, policy and procedure. Personal Data is secured by technical measures to protect and safeguard it.

### ORGANISATIONS.

Gloucester City Homes is a signatory of the Gloucestershire Information Sharing Agreement.

The following organisations have access so the data:

Organisation	Purpose	Dataset	Protection Afforded by	Data Location
<b>Core Reporting</b>	Legal Obligation	Social Lettings information – not direct personal information	Duties and obligations of being Data Controller.	UK based
<b>Gloucester City Council – and other District Authorities.</b>	Communicating with the Statutory Housing/Local Taxation/Benefits Authority.	As required by Statutory Duty.	Duties and obligations of being Data Controller.  Statutory Authority.	UK based
<b>GCH Property Services and Property Care including contractors.</b>				
<b>GCH Back Office and Support Teams.</b>				
<b>GCH Tenancy Sustainment</b>				
<b>P3 Charity</b>				
<b>As required tailored support via agencies and charities.</b>				

# GLoucester City Homes

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<b>Glevum</b>	Provision of Out of Hours manned guarding at Caradis, Nova and Prior Accommodation Units.	Limited and brief resident contact information to complete service	Duties and obligations of being Data Controller.  Contract of Goods and Services.	Not listed.
<b>Voluntas.</b>	Service Management reporting and surveys	Resident contact information to complete required works	Duties and obligations of being Data Controller.  Contract of Goods and Services.	UK based
<b>Message Link</b>	Provision of Out of Hours Support	Resident information to enter/log repair or service fault.	Duties and obligations of being Data Controller & Contract	UK based

- Gloucester City Council.
- Gloucestershire County Council,
- Health Services and the NHS
- The Police and other Emergency Services.
- Other Housing Associations and Registered Providers.
- Our Agents, Contractors, and Trusted Partners.

When we share information it is done so in a lawful and legal manner in support of Data Subjects.

Gloucester City Homes will strive to ensure that any personal data in its care will be kept safely and where your information is disclosed to a third party, Gloucester City Homes will seek to ensure that the third party has sufficient systems and procedures in place to prevent the loss of personal data. These are supported by legal contracts, and the use of Data Sharing Agreements, and Information Sharing Agreements and Schedules.

Gloucester City Homes may need to share personal information with government departments and agencies, with our regulator and auditors, with Local Authorities, utility companies or with other organisations and agencies, including the Police, where we are legally allowed to do so.



### STORAGE AND RETENTION

Data is retained for the length of the Licence Agreement plus 6 years after this, or past a legal action.

We may retain information longer to aid and record information about vulnerable and at-risk individuals, provide corporate memory on Licence Holders and the circumstances of the Individual. To exercise a legal or regulatory defence, or information on a Licence holder where they have held a number of Licence Agreements but have remained a Tenant of Gloucester City Homes. In these cases, information is held for the period the individual has been a Tenant of Gloucester City Homes.

Please note that the storage and retention of personal data connected with a Licence Agreement are part of our regulated activity, and so are governed by Legal, Regulatory, or Trade Body Guidance and advice.

GCH retains information for 6 years after the closing of a Licence Agreement, where P3 Charity retains information for a period of 20 years after the closing of the case files.



### SHARING CONSIDERATION

Gloucester City Homes will only share information in connection with our duties under the terms of the Licence Agreement, and under our obligations as a Registered Provider of Social Housing, and when there is a duty of care toward you. All sharing of personal information is done so under the terms of the Data Protection Act 2018. Organisations or people who we may share information with as a non-exhaustive example include:

- Individuals you have supplied as a contact.
- Other departments within Gloucester City Homes,

#### National Fraud Initiative.

We have an obligation to protect public funds from fraud and misuse. As a result of this we are obliged to share social tenancy information as part of the [National Fraud Initiative](#), and the [Gloucestershire tenancy Fraud Forum](#). The data is used for the prevention and detection of fraud.

#### CORE Reporting.

Under the Homelessness Reduction Act 2017 the Ministry of Housing, Communities and Local Government (DCLG collects data from local authorities on homeless persons). We will share information at Homelessness Case Level, and in line with Service and Management Agreements held with District Authorities where they act as the Statutory Housing Authority and Gloucester City Homes. We also provide statistical information when a tenancy begins to the Ministry of Housing, Communities and Local Government. A Privacy Notice for **C**ontinuous Recording of social housing **I**ettings and sales system (CORE) is available from our website: <https://www.gch.co.uk/privacy>.

#### When a Debt is owed to Gloucester City Homes

It is important to know that we may share your details to trace and locate individuals where a lawful and legal debt is owed so that we can pursue this debt. Rental income, rents, and service charge income is used to further support the aims and mission of Gloucester City Homes. This is lawful and legal to do.

#### Authority on Account.

Licence Holders are able to add trusted people to act on their behalf via our "Authority on Account" form, available via Customer Services or via the Data Protection Officer.







# GLOUCESTER CITY HOMES

## FAIR PROCESSING NOTICE - HOMELESS ACCOMMODATION SERVICE (P3)

### Anti-Social Behaviour (ASB) Information.

In the event of ASB, we may record and process information about ASB instances from a number of sources. If information is provided to us in a confidential manner, and in a way that confidential processing could be reasonably expected we will comply with this. If we are required to disclose such information we reserve the right to redact the document in part or in full within legal and lawful limits in regard to redaction.

### WHEN WE SHARE YOUR INFORMATION WITHOUT YOUR CONSENT.

There are times when by the nature of the service we provide, and in direct response to a situation or event presented, we may share your information with the Police, Ambulance and NHS Services, Fire and Rescue Services, Statutory bodies and Agencies. In these cases it is reasonable to do so when considering the vital interests, or legal obligation of the individual or the response of Gloucester City Homes. This may be information such as your personal information, information on health or medical conditions, methods of access to accommodation (such as key safe information), or other personal circumstantial information.

This is done under our Duty of Care and concern for welfare and professional obligations, as a Registered Provider of Social Housing, and any information will be transferred using other lawful basis of processing than your consent.

### Safeguarding and Protectionist Panels . CONCERNING THE PROTECTION AND SAFEGUARDING OF OTHERS.

It is important to understand that when our employees or agents attend a protectionist panel of any nature or type, and share information about an individual, the panel is responsible for this information as the Data Controller, and is responsible for questions and requests connected with it. The **sole** and **only** contact is the Chair of the Panel in question. Gloucester City Homes act under a legal instruction or obligation and will refer all Data Subject Access Requests to the Chair of the Panel. As an organisation we will respond to requests via the Chair only (as we are Data Processors within Panel arrangements).

### THIS MEASURE IS TO ENSURE THE SAFETY AND SECURITY OF OTHERS WHO SOME MAY FEEL REQUIRE INTERVENTION AND SAFEGUARDING.

For any questions about Data Protection or Privacy please speak to a member of the Homeless Accommodation Service.



### CONTACTS AND THE INFORMATION COMMISSIONER'S OFFICE

You can contact the Gloucester City Homes Data Protection Officer at [dpo@gch.co.uk](mailto:dpo@gch.co.uk) or you can request an appointment via Customer Services.

Gloucester City Homes  
Railway House,

Bruton Way  
Gloucester  
GL1 1DG  
Telephone Number: 01452 424344  
Email Address: [customer.services@gch.co.uk](mailto:customer.services@gch.co.uk)

[The Information Commissioner's Office \(ICO\)](#) in relation to how Gloucester City Homes and/or Lifelink processes your personal data is also respected.

Information Commissioner's Office  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire  
SK9 5AF  
Telephone Number 0303 123 1114 (local rate)  
Email address: [casework@ico.org.uk](mailto:casework@ico.org.uk)

