#### **Homes for Ukraine Team Privacy Notice**

Bristol City Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the UK General Data Protection Regulation (UK GDPR), which means it determines what your personal data is used for and why it is collected.

The purpose of this privacy notice is to tell you about how we collect and use personal data in connection with our service. We may update this privacy notice from time to time. When we do this, we will communicate any changes to you and publish the revised privacy notice on our website. Our main address is City Hall, College Green, Bristol, BS1 5TR and our contact details can be found on Bristol City Website

#### **Definitions and Purpose of data collection and sharing**

The Homes for Ukraine scheme was launched on 14 March 2022 by the Secretary of State for Levelling Up, Housing and Communities. The <u>scheme</u> allows individuals to sponsor named people from Ukraine. Guests will be able to live and work in the UK for up to 3 years and access benefits, healthcare, employment, and other support.

The Bristol City Council Homes for Ukraine Team and partners provides support outlined in government guidance and further support as identified.

We have also setup a number of ways for landlords to make their properties available for Ukrainian guests in exchange for a rent: the Homes for Ukraine Tenancy scheme, the Private Rented Sector Tenancy scheme, offering a room for rent to a lodger, and the HMO scheme – full details <a href="here">here</a>.

We need to keep your personal information so we can perform all these duties. We keep your personal information and records of contact with you, or people/organisations related to your welfare and support (guests and hosts), within the Homes for Ukraine Case File.

- A **landlord** is someone who has made a property available for Ukrainian guests in exchange for a rent.
- A **sponsor** is someone who made the initial application to the Homes for Ukraine scheme and was matched with an individual/group who had not yet arrived in the UK.
- A **host** is someone providing accommodation in their home to approved people on the Homes for Ukraine scheme.
- Most sponsors are also hosts, although this is not always the case. Some hosts did not make the
  application but provided accommodation to those already in the UK with a Homes for Ukraine
  visa.
- A **Referrer** is someone providing details of a potential host using the 'Refer a Host' process
- A Potential host is someone referred by a referrer using the 'Refer a Host' process

### What data we need to collect and use?

To provide this service, we will collect and use the personal information below:

Sponsor, host, potential host, and referrer data:

- Name
- Address
- Date of birth
- Gender

- Email address
- Phone number(s)
- Safeguarding checks/outcomes, including data returned from a standard or enhanced DBS Check – hosts only – not referrer
- Details of your home (property type / number of rooms)
- Family and household details
- Bank details

The data listed above will also be collected and stored regarding:

- individuals living in the same household as a host DBS Checks are only completed on individuals aged 16 and over
- individuals recommended as a host by another data subject providing an offer of help via DLUHC
- persons who refer potential hosts

#### Guest data:

- Name
- Address
- Date of birth
- Gender
- Email address
- Phone number(s)
- UK arrival date
- Passport number
- National Insurance number
- NHS number
- <u>Biometric Residence Permit</u> (BRP) number a government issued permit to use as proof of the holder's right to stay, work or study in the UK.
- Education/Employment/Career history
- Family and household details (including data listed above)

### Landlord data:

- Name
- Address
- Date of birth
- Email address
- Phone number(s)
- Details of the property made available for Ukrainian guests (legal and regulatory documents)
- Bank details

We get some of this information from you and from what we learn about you through your use of our services, but we may also get some information about you from the <u>Department for Levelling Up, Housing & Communities</u>, and the <u>Disclosure & Barring Service</u>.

We also get empty property and licencing information from the Private Housing Service so we can give information to property owners about schemes that bring empty properties into use by providing accommodation to Ukrainian refugees. See the <u>Private Housing Service Privacy Notice</u>.

#### How do we use your personal information?

We use this information for one or more of the following reasons:

- Pre-arrival and post-arrival checks for hosts and guests
- Accommodation and welfare checks for hosts and guests
- Disclosure and Barring Service (DBS) checks for hosts
- Any other checks required to assess host suitability
- Support for hosts
- Support for guests
- Accommodation checks and communication with landlords.

**For Ukrainian guests:** Before you arrive in the UK, to get ready for your arrival we schedule a Home Safety Check and a Welfare visit at the host's address that you have been matched with and liaise with your matched host and/or agencies and partners in preparation for your arrival. After you arrive, we may use your personal information for the following purposes:

- To help you to claim benefits
- To help you access employment support
- To help you access social support at the Welcome Hubs
- To help you to register with gas, electric, Wi-Fi and water companies
- To assist with any medical and other support needs you disclose
- To help you register for English classes
- To help you find a new host if your arrangement needs to end this might involve sharing information with partner organisations

**For sponsors, hosts and potential hosts:** To get ready for your guests' arrival, we schedule a Home Safety Check and a Welfare visit at your address. After your guest arrives, we use your personal information to support you in your role as host.

Where Ukrainian guests need to be rematched with a new host, we will ensure a DBS Check is completed on all members of the prospective host family who are aged 16 and above. This may be arranged by an approved partner organisation we have entered into an agreement with.

**For landlords:** Before your property can be made available on one of our schemes, we need to complete certain checks:

Legal and regulatory checks required to enable a tenancy

We will share basic personal information regarding landlords entering into a lodging agreement with Refugee Welcome Homes who put an agreement in place and support the landlord.

#### Who else might we share your personal information with?

Sometimes we may need to share your information, but we will only do so where we have a valid legal basis to share data. We will only share the minimum information for each circumstance. We may ask for your permission to share some of your personal information with one or more of the following:

#### Internal departments:

- Adult Social Care
- Attendance & Belonging Team
- Children's Services
- Disability Services

- Housing
- Other internal departments as required, and compatible with, the purpose described in this
  privacy notice

### Other Agencies and Organisations:

- Befriending organisations
- Department for Levelling Up, Housing and Communities
- Disclosure and Barring Service
- Employment support services
- English language learning providers
- Good Faith Partnership / Welcome Hubs
- Home Office
- Nurseries and child minders
- Other Local Authorities
- Refugee support groups and organisations
- Refugee Welcome Homes
- Approved partner organisation we have entered into an agreement with

No personal information is routinely sent or held outside the UK. Should the transfer of personal information outside the UK become necessary, it will only take place if permitted by law, and then only where there are appropriate safeguards in place to protect the data.

We may use the information we hold about you to assist in the detection and prevention of crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

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

Our lawful bases for processing the data are:

- Art.6(1)(e) of the UK GDPR processing is necessary for the performance of a task carried
  out in the public interest or in the exercise of official authority vested in the controller. The
  overarching legal gateway for the processing is provided by section 111 of the Local
  Government Act 1972, which allows local authorities "to do anything... which is calculated to
  facilitate, or is conducive or incidental, to the discharge of any of their functions".
- Art.6(1)(c) of the UK GDPR processing is necessary for compliance with a legal obligation to
  which the controller is subject. Our legal obligations in relation to this process are provided
  under the Equality Act 2010, the Care Act 2014, the Childrens Act 1989 and the Immigration
  and Asylum Act 1999.

DBS criminal record checks for all adults (16 and over) in the sponsor household will also be necessary for reasons of public task and official authority, under the <a href="Homes for Ukraine guidance for councils">Homes for Ukraine guidance for councils</a>

### **Special Category Data**

Special category data can be defined as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

Our lawful basis to process your special category data can be found under Art.9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of 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 domestic law. In this instance, special category information will be processed to ensure the safeguarding of children and individuals at risk.

### How long we will keep your personal information?

In accordance with the principle of data minimisation and as instructed by the Department for Levelling Up, Housing and Communities (DLUHC), we shall delete relevant personal data as required by the records retention schedules and within 2 years of the closure of the scheme unless DLUHC and the Home Office identifies that its continued retention is unnecessary before that point.

In accordance with <u>government guidance</u>, we shall delete information revealed by a DBS Check six months after the return of the check.

### Your rights as a data subject

The law gives you rights to control what and how personal information is used by us, including the right to access a copy of your personal information and withdraw your consent when we rely on your permission to use your personal data.

Full details about your rights can be found in our main privacy notice.

To access a copy of your personal information, more details and how to make a request can be found on the <u>data protection subject access requests page on the council website</u>.

To update or correct your information if it is inaccurate, please contact Citizens Services.

You can exercise any of these rights, ask questions about how we use your personal data or complain by contacting us at <a href="mailto:data.protection@bristol.gov.uk">data.protection@bristol.gov.uk</a> or by writing to our data protection officer at:

Data Protection Officer Information Governance Bristol City Council City Hall College Green Bristol BS1 5TR

If you think we have dealt with your information inappropriately or unlawfully, you have the right to complain to the ICO at:

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

Website: https://ico.org.uk/