

Housing Support Register

Client Privacy Notice

Purpose

The purpose of this Privacy Notice is to tell you about what information Bristol City Council and our approved partner agencies collect and store about you on the Bristol City Council Housing Support Register (HSR) database. It also tells you how we use that information and who we may share it with. This Privacy Notice may be given to you directly by Bristol City Council, or it may be given to you via one of our approved partner agencies.

Who is this Privacy Notice for?

This Privacy Notice is for any direct customers of Bristol City Council. It is also for clients of any commissioned or non-commissioned partner agency of the council that is permitted to use the Housing Support Register (HSR) for data information storage, processing and sharing.

What is the Housing Support Register?

The Housing Support Register (you may also hear it talked about or referred to as the HSR) is a service, using a web based software application, that Bristol City Council uses for the purposes of storing, managing and sharing the information of its customers.

What do we use the HSR for?

Bristol City Council use the HSR in a variety of ways which supports us to deliver the best possible service and outcomes for you in relation to your homelessness, housing and support related needs. Below are some of the key ways in which we use the HSR and how it supports our work.

- It is a central place where Bristol City Council and its partner agencies can enter, store and share key information about you. This increases the security of how your information is held and passed between different services and agencies.
- To develop and use a "Trusted Assessment" approach. This will prevent you from having to tell the same information too many times to too many different services and agencies.
- To deliver the Housing Options service.
- For one support partner or service to be able to refer you to another for housing or other support related services (e.g. welfare benefits or resettlement support).
- To enable us to look at the different demographics, range of needs of and feedback from the people who use our housing and homelessness services across the city. This helps us make sure we are providing the right services in the right way for you.
- For compiling and reporting outcomes to people and organisations (e.g. The Ministries of Housing Communities and Local Government) that have provided funding to Bristol City Council for homelessness and related services.

Who controls and processes your data on the HSR?

Firstly it is important for us to tell you the difference between a Data Controller and a Data Processor.

Data Controller – someone (a person or an organisation) who controls information about you and sets out the rules for what information can be gathered from you, why they are gathering it and how it should be stored and processed.

Data Processor – someone who (a person or organisation) who, for example, inputs or updates your information, shares it with another person or organisation or uses it for a reporting purposes.

Bristol City Council is the *main* data controller for the purposes of the Data Protection Act 1998 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679), which means it determines what your data is used for and why it is collected.

Bristol City Council is also a processor of your information.

The contact details for Bristol City Council are as follows:

Bristol City Council,
City Hall,
College Green,
Bristol
BS1 5TR.

Bristol City Council allows a number of external services and partner agencies to use the HSR in relation to your homelessness, housing and support related needs. You will have already read about some of the reasons that we do this in the section “**What do we use the HSR for?**”

These partner agencies are also considered independent controllers and processors of your information.

Here is a list of the current services and partner agencies that we have permitted to use the HSR for the inputting, processing and sharing of your information. You can get the full contact details of each organisation by visiting their website or calling the main contact number listed.

| Name of Organisation | Website | Telephone Number |
|--|---|-----------------------------|
| The Salvation Army | https://www.salvationarmy.org.uk/ | 0117 955 2821 (Logos House) |
| Second Step | https://www.second-step.co.uk/ | 0117 909 6630 |
| St Mungo's | https://www.mungos.org/ | 0117 954 2958 (New Street) |
| ARA (Recovery for All) | http://recovery4all.co.uk/ | 0117 930 0282 |
| DHI (Developing Health and Independence) | https://www.dhi-online.org.uk/ | 01225 478730 |
| 1625 Independent People | https://www.1625ip.co.uk/ | 0117 317 8800 |

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|-------------------------------|---|---------------|
| Places for People | https://www.placesforpeople.co.uk/ | 0117 970 4573 |
| Live West Housing Association | https://www.livewest.co.uk/ | 01934 526000 |
| Riverside Care and Support | https://www.riverside.org.uk/ | 0117 924 6415 |
| Self Help Housing Association | www.selfhelpha.co.uk | 0117 970 5400 |
| Elim Housing | https://www.elimhousing.co.uk/ | 01454 411172 |
| One25 | https://one25.org.uk/ | 0117 909 8832 |
| The Junction Project | http://www.thejunctionproject.org.uk/ | 0117 960 3326 |
| Bristol Parents Alliance | https://www.elimhousing.co.uk/support-services/services-for-young-parents | 0117 955 9792 |
| Missing Link | https://missinglinkhousing.co.uk/ | 0117 925 1811 |
| Caring in Bristol | https://caringinbristol.co.uk/ | 0117 924 4444 |
| Next Link | https://nextlinkhousing.co.uk/ | 0117 925 0680 |
| Emergency Duty Team (EDT) | https://www.bristol.gov.uk/social-care-health/emergency-duty-team | 01454 615 165 |

Please bear in mind that the organisations that are permitted to view and use the HSR can change from time to time. For example, a new organisation may start or stop running a service that you use or we might create a new service that is run by a different organisation to the ones listed above. If you want to check if an organisation you are working with is permitted by us to use the HSR, and you cannot see them listed here you can contact us at: hsr.admin@bristol.gov.uk

How do we ensure our permitted partners use the HSR correctly and that your information is protected and safe?

Before any permitted person is allowed to have access to and use the HSR they have to sign a copy of our “HSR System User and Data Sharing Agreement”. This also must be signed by their manager.

The agreement sets out our expectations and by signing it, the new user agrees to a number of important conditions of using the HSR such as:

- Making sure that they have fully explained to you how your information is stored, processed and shared on the HSR.
- Making sure that the information they input about you is complete and accurate
- Making sure that they are careful with their log in and password for the HSR and not share it with anyone else.
- Informing us immediately if they think any unauthorised person may have their log in and password information or if there has been a breach of data.
- Not sharing or discussing your information with any unauthorised person.
- Complying with all the legal requirements of Data Protection and GDPR at all times.

We are happy for you to see a copy of the “HSR System User and Information Sharing Agreement. You can request a copy of this to read by contacting hsr.admin@bristol.gov.uk

What data we need to collect for the HSR and the legal basis for processing it:

We will process data on your name, date of birth, ethnicity, religion/faith, financial circumstances, contact details, information relating to your housing, and information relating to your health, social circumstances and support needs insofar as they are relevant to your application and needs for help with housing and homelessness related support. We will need to collect this data in relation to every member of your household.

To provide this service, we will process your name, date of birth, national insurance number, address, email address, some household details, relevant health factors; and the reasons for your potential or actual homelessness. We are collecting this data under our statutory obligations under homelessness prevention, housing and welfare reform legislation; and/or because it is necessary for us to provide the service that you wish to receive or where we are performing a task carried out in the public interest”.

The following are the legal justifications for processing your data:

- *Art.6(1)(c) Processing is necessary for compliance with a legal obligation to which the controller is subject*
- *Art.6(1)(e) 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*
- *Art.9(2)(c) Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physical or legally incapable of giving consent*
- *Art.9(2)(i) Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the freedoms of the data subject, in particular professional secrecy;*

Personal Housing Plans

If you are owed any prevention or relief duty by Bristol City Council you will be issued with a Personal Housing Plan (PHP). This is an important document that details the steps and actions you, the council and our partner agencies will need to take in order to prevent or end your homelessness.

Your PHP will be held centrally on the HSR and will be shared with all relevant services and agencies permitted to use the HSR and who are party to your housing plan.

How long we will keep your data for:

We will hold this information for 6 years after we cease to provide a service to you, unless the law says that we need to hold it for longer. In a limited number of specific circumstances, where there is significant historical risk, information may be retained for a longer period.

Why we need to collect your data:

We will use this information to:

- Prevent and/or relieve your homelessness.

- Ensure that you are appropriately and sustainably housed e.g. in supported, temporary, private rented or social housing.
- Ensure that you are appropriately supported, where needed, to maintain your housing or tenancy.
- Ensure that you are advised and supported to ensure that you understand your welfare rights, you have access to money and welfare advice and your income is maximised.
- Ensure that you are assisted and supported with any other needs and challenges that may impact on you being able to keep your current housing or to find housing if you are currently homeless.
- Address any problems and overcome any obstacles with the above.
- Reporting purposes.

Who we share your data with and why:

This data will be available to a range of relevant internal and external colleagues, services and partner agencies and may be disclosed to other teams within Bristol City Council, and/or to other providers of services, where data sharing is necessary to provide our services.

These are:

- BCC Revenues and Benefits
- BCC Housing Options
- BCC Adult Social Care
- BCC Children and Families
- Other relevant BCC departments
- Housing Associations, supported housing and floating support providers
- Commissioned and non-commissioned organisations who provide housing and homelessness related services
- Other permitted support providers
- Private landlords
- The National Probation Service, including Community Rehabilitation Companies (CRCs)
- HM Prison Service
- National Health Service
- Schools and children's centres
- The Department for Work and Pensions
- Her Majesty's Revenue & Customs
- The Ministry for Housing, Communities and Local Government (MHCLG)*

*In addition we may share personal data with MHCLG to support the evaluation of services. In these cases you will be contacted by MHCLG for an explanation of their data processes and to consent to inclusion in the evaluation.

NB We will share information with other organisations where this is necessary to prevent fraud.

This data will be shared with some or all of the above services as required by your situation, so that your homelessness can be prevented or relieved.

Where we have used automated processing or profiling:

Some automatic data processing may be used to help make decisions based on the information you supply. This decision is reached by matching your circumstances with known homelessness risk triggers, after which we may offer a homelessness prevention or relief service to you. This is important because it is our duty to try to prevent homelessness or relieve homelessness whenever possible.

What happens when we have received your data from a third party:

We obtain some data from referrals to our service. This data includes: your name, date of birth, ethnicity, religion/faith, financial circumstances, contact details, information relating to your housing, and information relating to your health and social circumstances insofar as they are relevant to your homelessness, housing and support related needs.

We must provide this privacy notice to you within one month of receiving the information from the organisation we receive your data from at first point of contact with you or when data is passed on to another third party, whichever comes first.

Your rights as a data subject:

You have the right to ask for access to your data and where data is found to be inaccurate to have that data corrected. In certain circumstances you have the right to have data held about you erased, or the use of it restricted. You may be able to object to processing and may also have the right to have your data transferred to another data controller.

You also have a right of complaint to the Information Commissioner's Office (ICO) at www.ico.org.uk if you think we have not dealt with your information in a proper manner. You can ask to see what information we hold about you and have access to it.

You can do this by contacting:

Data Protection Officer
Information Governance Service
Bristol City Council
P O Box 3399
BRISTOL
BS3 9FS
Email: Data.protection@bristol.gov.uk

Other questions about the data being processed may also be sent to the above address.

Fraud Prevention and Detection:

Bristol City Council is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for auditing, administering public funds, or where undertaking a public function, in order to prevent and detect fraud. For more information visit www.bristol.gov.uk/data-protection-foi/fraud-prevention-and-detection .