FAIR PROCESSING NOTICE

This Fair Processing Notice refers specifically to data that is collected using the Common Assessment Form and the information provided about individuals that are referred to Reading Homelessness Support Services. The Common Assessment Form (CAF) is the standard form used to refer into Homelessness Support Services that are commissioned by Reading Borough Council to support people that are homeless or at risk of homelessness. Any variation of this form as agreed by partners will be subject to the same conditions.

Reading Borough Council will share personal information about an individual with other services when it is appropriate to do so. Most agencies involved in providing services are required by law to cooperate to improve the wellbeing of vulnerable adults. Any information supplied on the CAF is confidential, but will be shared on a ‘need to know’ basis among services involved in the support of the individual or individuals that have been referred. The purpose of sharing information is to enable suitable services to be provided to individuals by developing a better understanding of the strengths and support needs of the individual or individuals that have or could result in homelessness.

Under The General Data Protection Regulation 2016/679 (GDPR) the lawful basis for processing this data is set out in Article 6(1)(e). This gives Reading Borough Council a lawful basis for processing where: “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”

What Personal Data is held?

The following information will be held where relevant

- names
- address history
- date of birth
- protected characteristics
- contact details (email/telephone)
- next of kin and emergency contact details
- details of any pets
- income details
- details of benefits
- other financial information such as debts and rent information
- physical/mental health conditions
- nationality
- national insurance number
- offending and other information relating to the criminal justice system
- support needs, i.e. substance/alcohol misuse information
- support networks and their contact details
- education and employment details

What is the purpose of collecting this data?

The information collected in the CAF is used by Reading Borough Council to help make decisions on suitable offers of support to those who present as homeless or those who are in danger of becoming homeless. It also allows Reading Borough Council to effectively monitor the support provided and will help to inform future commissioning decisions.

Who will have access to it?

The data is accessed by staff working in Housing Services which has a number of functional areas, for example, Housing Needs and Neighbourhood Management. Staff in each area can access the data that is essential to the performance of their duties. A small number of audited senior users across other departments in Reading Borough Council can also access the data. We supply information to Reading Borough Council’s Corporate Investigation and Housing Benefit teams that we suspect has not been reported about any changes in household income and household make up for the purposes of preventing fraud and overpayments of Housing Benefit. We will also supply the Council’s Corporate Investigation team personal information for the purposes of data matching with the National Fraud Initiative in line with the Audit Commission.
Who might this data be shared with and for what purpose?

In order to receive support from Reading’s Homelessness Support Services an individual’s information will be discussed at multiagency panels for the purpose of assessing the suitability of the referral, any risk management considerations and if suitable what type of support will be offered. Members of these multiagency panels include:

- Reading Borough Council Housing Needs staff
- Launchpad Reading
- The Salvation Army
- St Mungo’s
- The Police
- Probation
- HM Prison Service
- drug and alcohol services
- NHS
- Adult Social Care.

Information may be shared with other teams outside of the multiagency panels, again for the purpose of managing risk and making decisions on support. This may include:

- Environmental Health
- Troubled Families Team
- Housing Benefit
- Housing Management
- Choice Based Lettings team (Homechoice Bidding)
- temporary accommodation providers
- Rent Guarantee Scheme
- landlords/letting agents
- independent medical advisor
- General Practitioner
- Adult and Children’s Social Care
- emergency duty team (Bracknell Forest)
- other local authorities
- other Government bodies, i.e. Department of Work and Pensions, Home Office, Ministry of Housing Communities and Local Government
- community/voluntary sector agencies
- Multi-Agency Safeguarding Hub (MASH) for safeguarding concerns relating to children
- community midwives regarding under-five’s in emergency/temporary accommodation
- providers of emergency/temporary accommodation
- Multi-Agency Public Protection Arrangements (MAPPA)
- Multi-Agency Risk Assessment Conference (MARAC)
- Domestic Abuse Repeat Incident Meeting (DARIM) may receive information relating to cases of domestic abuse for the purposes of risk management and safeguarding.

How will it be stored?

The data is stored electronically on Reading Borough Council encrypted laptops and on two IT systems known as OHMS and Information@Work which are both supplied and supported by a private commercial company named Northgate.

How long will it be stored for?

Reading Borough Council will keep the data contained within the CAF for seven years from the point at which it ceases to be active.

How can the data subject have access to it?

The data subject can have access to their data by making a “subject access request”. This is done by completing a form and providing relevant identification. Any data referring to the subject will be collated and made available to the subject within 1 month. A request can be made verbally or in writing, electronically or otherwise. Individuals can request that the data be provided in different formats. Requests can be made by following the link: www.reading.gov.uk/dataprotection

Contact details of the Data Protection Officer

Ricky.gill@reading.gov.uk
What other rights does the individual have?

The right to have their data corrected, the right to have their data deleted in certain circumstances and their right to put a complaint to the Information Commissioner’s Office (ICO). There will be no automated decision making and no data is to be transferred outside the EU.

More information about Reading Borough Council’s responsibility under GDPR can be found at http://www.reading.gov.uk/dataprotection