

Privacy Notice for Housing Benefit, Council Tax Support, Housing Payment and Local Welfare Provision

Purpose for processing your information

To quickly and accurately assess you for entitlement to Housing Benefit, Council Tax Support, Housing Payments under the Crisis and Resilience Fund (previously known as Discretionary Housing Payment) and/or Local Welfare Provision including Hardship Fund and Crisis and Resilience Fund (previously known as Household Support Fund).

Your information may also be used to prevent or detect fraud or where we think there may be a risk of serious harm or threat to life.

Where possible, new IT systems and the development of existing IT systems will make use of system generated or anonymised data in test environments. However, there may be circumstances in which test environments, their users and their developers appointed by Harrow Council may be required to utilise your personal data in a test environment. In such circumstances, Harrow Council require that development and test activity comply with data protection legislation, taking reasonable steps to protect your personal data

Where the law allows us to we may also use your information to inform you of other services that may be of benefit to you, such as if there are benefits you may be entitled to.

Information is usually required about other people in your household to enable us to work out how much benefit you are entitled to. You should advise them that their information will also be processed. We collect the following information:

Details about you, people in your household and possibly third parties such as your landlord or joint tenants is required. The information needed includes:

- Name
- Address
- Date of Birth
- National Insurance Number
- Income including earnings, self-employed accounts, benefits received/claimed, loans, student income, pensions
- Expenditure such as childcare costs
- Capital including bank/building society accounts, shares Rent details
- Contact details including telephone number and email
- Your IP (Internet Protocol) address
- Landlord name and address and possibly bank account
- Details of who else lives in your household and the above details for them as well as for yourself

This information is only used for the intended purpose but if we intend to use it for any other purpose; we will normally ask you first. In some cases, the Council may use your information for another purpose if it has a legal duty to do so, to provide a complete service to you, to prevent and detect fraud, or if there is a risk of serious harm or threat to life.

Special category data

We may sometimes need to collect special category data about you which could include

- Racial or ethnic origin
- Religious or philosophical beliefs

- Data about health
- Data about a person's sex life or sexual orientation

We will only collect this data for the intended purpose. However, if we use it for any other purpose we will normally ask you first. In some cases, we may use your information for another purpose if we have a legal duty to do so.

How we collect your information

Information could be collected from:

- You
- Department for Work and Pensions (DWP)
- HM Revenues and Customs (HMRC)
- Department for Levelling Up, Housing and Communities
- Cabinet Office
- Other local authorities Other Council Services
- Third parties such as your employer. We will normally ask for your consent before doing this.

Information will be collected using different methods including by letter, email, face-to-face, online forms, electronic transfer of information from central government departments mainly DWP, HMRC and Cabinet Office

Who the information is shared with

The information may be shared with the following:

- You
- Your landlord if Housing Benefit is paid to them then limited information about your claim will be shared
- Third parties where you have given your consent for information relating to your Housing Benefit, Council Tax Support, Housing Payment, Hardship Fund and/or Crisis and Resilience Fund to be shared with them.
- Council staff employed to administer Housing Benefit, Council Tax Support, Housing Payment and/or Local Welfare Provision.
- Department for Work and Pensions (DWP)
- HM Revenues and Customs (HMRC)
- Ministry of Housing, Communities and Local Government, Cabinet Office
- Council departments, Department for Education and local schools where you have given your consent through applying for free school meals (FSM)
- An external company who are paid to administer Housing Benefit, Council Tax Support, Housing Payments and/or any Local Welfare Provision such as the Crisis and Resilience Fund on behalf of the local authority
- External companies who support the Council in administering Housing Benefits and Council Tax Support through automated processing including the use of robotics
- An external company who are appointed to audit the Council's accounts including Housing Benefit subsidy
- External companies who deliver services to enable your Housing Benefit, Council Tax Support, Housing Payment and/or Local Welfare Provision claim to be processed, for example by supplying an online claim form service or printing
- External companies who support the Council in analysing data to enable us to advise you of services that you may be interested in
- Third parties where there is a legal gateway that permits it and it is deemed to be in your interest, for example as part of a benefit take-up campaign.
- Other Council Services
- Other local authorities

Information will usually only be shared to enable quick and accurate assessment of Housing Benefit, Council Tax Support, Housing Payments, Local Welfare Provision including Crisis and Resilience Fund, recovery of overpaid benefit, Free School Meal applications or to identify services that may be

benefit to you. If we intend to use it for any other purpose; we will normally ask you first. In some cases, the Council may use your information for another purpose if it has a legal duty to do so, to provide a complete service to you, to prevent and detect fraud, or if there is a risk of serious harm or threat to life.

Sharing of information with Policy in Practice

The Benefits, Council Tax and Housing teams will share data with each other and with an organisation called Policy in Practice. We do this to identify residents who may be at risk of poverty or homelessness. We use anonymised data to understand the geographical location and number of low income families that are at risk of financial hardship and eviction.

This data includes: income, economic, disability and benefit status, Universal Credit, Housing Benefit, Housing Payments (previously known as Discretionary Housing Payments), Council Tax data including Council Tax Support and rent arrears.

The law that allows us to do this is the Welfare Reform Act 2012 and Social Security (Information-sharing in relation to Welfare Services) Amendment and Prescribed Bodies Regulations 2013.

The Department for Work and Pensions (DWP) are aware of the sharing of data with Policy in Practice and the handling of information complies with the Memorandum of Understanding on data sharing between the London Borough of Harrow and the DWP.

Automated Decision Making

We may sometimes make an automatic decision or use robotics on your Housing Benefit or Council Tax Support claim. You will be sent a decision notice if this changes how much benefit you are entitled to. You can request that this decision is reviewed by a member of staff if you would like to do so. Details of how to make this request will be given on the letter telling you about the decision.

How long do we keep your information?

Your information will normally be held for up to 6 years after your claim for one of the services was closed. If there is an outstanding overpayment associated with a closed claim then information will be retained for six years after full repayment of the overpayment. If the claim has an active fraud investigation, we retain all information until six years after the end of the fraud investigation and conclusion of court action. Where needed due to auditing requirements placed on the Council, information may be held for more than six years.

Lawful basis for processing your information

The General Data Protection Regulations (GDPR) set out lawful bases for your data to be processed. Data will be processed for the purposes set out in this privacy notice under Article 6 of the UK GDPR

(a) Consent – if you have given us your consent for your data to be processed

(e) Public task – if the Council cannot carry out its statutory functions without processing your data and it is deemed to be in the public interest

Your rights and access to your information

You have the right to request a copy of the information that we hold about you.

The General Data Protection Regulations (GDPR) also give you additional rights about the information we hold about you and how we use it, including the right to:

- Withdraw consent and the right to object and restrict further processing of your data; however, this may affect service delivery to you.
- Request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it
- Request your data to be rectified if it is inaccurate or incomplete

- Have your data transferred or copied should you move to another authority
- Not to be subject to automated decision-making including profiling

To submit a Subject Access Request visit our [request page](#)

If you have any concerns

Please contact us if you would like to know more about the information we hold about you and how we use it www.harrow.gov.uk/benefitsenquiryform

You have a right to complain to us if you think we have not complied with our obligation for handling your personal information; please visit our [Complaints and Compliments page](#)

If you are not satisfied with the Council's response you have a right to complaint to the Information Commissioner's Officer (ICO). You can report a concern by visiting the [ICO website](#).

Changes in your circumstances

You must notify us immediately if there are any changes in your circumstances and personal details so we can maintain an accurate and up to date record of your information. Changes that may affect your entitlement to benefit can be made online at www.harrow.gov.uk/hbenchangeofcircs