

# Privacy Policy

This privacy policy explains how we (Sutton Council) use any personal information we collect about you when you use our services.

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## What information do we collect about you?

We collect information about you when you register with us, contact us or use our services.

The information we collect may include your:

- contact details (including name, title, address, email address and telephone number)
- date of birth
- gender
- UK/EU/EEA residency details
- proof of identity
- national identifiers (including NHS number and NI number)
- IP address
- lifestyle, social and personal circumstances
- financial details
- employment details
- education records
- next of kin information
- signature
- housing information
- visual images, personal appearance and behaviour
- licenses or permits
- business activities
- voice recording
- website usage information
- racial or ethnic origin
- political opinions

- religious or philosophical beliefs
- trade union membership
- health or sex life and sexual orientation data
- criminal convictions and offences (including alleged)

We also collect information when you voluntarily complete customer surveys and provide feedback.

## How will we use the information?

How we use information about you will depend on the services you receive from us.

In general we will use your information to:

- fulfil our legal duties and obligations (including safeguarding children)
- provide efficient and effective services
- help you access the right services
- collect debts
- prevent, detect and prosecute fraud, corruption or other crimes
- personalise repeat visits to our website
- deliver national government programmes and initiatives.

To do so we may share your information between services and with other organisations, including:

- government departments, agencies and other public bodies
- other local authorities
- our subsidiary companies
- housing associations
- schools
- charities and voluntary organisations
- third party service providers.

We use G Suite and Google Cloud Platform to provide our services. This means that your information may be stored and processed on servers outside of the European Economic Area. Google has achieved internally accepted independent security standards for Information Security Management, Cloud Security and Cloud Privacy and has certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. For more information, visit [Google's website](#).

We must have a lawful basis for processing your information. The lawful bases available are:

- consent

- contract
- legal obligation
- vital interests
- public task
- legitimate interests

In most cases we will rely on the public task basis because our services are provided to meet a public duty.

In some instances the services we provide are optional. In that situation we will only provide the service and process your information if you have requested us to do so.

If we require your consent to lawfully process your information, we will usually seek that consent at the point you provide us with the information. You will be able to withdraw your consent at any stage and can do so by contacting the relevant service.

Different services will use your information in different ways. Please click the service name below for specific details about how we will use and share your information when providing those services and our legal basis for doing so:

- [council tax, business rates and benefits](#)
- planning and building control
- [child social care](#)
- [adult social care](#)
- education
- [libraries, heritage and arts](#)
- waste management
- licensing
- housing
- public health
- [parking](#)
- voting and elections
- [registrar services](#)
- human resources
- [community safety](#)
- [events safety](#)
- economic renewal and regeneration
- [local place and engagement](#)
- [asset management](#)
- [pensions administration](#)
- [insurance \(including compensation claims\)](#)
- [Sutton College](#)
- [Sutton Life Centre](#)

We will not share your information with other organisations for marketing purposes unless legally required to do so (for example, the electoral 'open register').

## How long will we keep your information?

We will not keep your information for longer than is necessary unless we have a legal obligation to hold the information beyond that time. For more information about how long we retain specific information please see our [retention schedule](#).

## Marketing and newsletters

We would like to send you information about what we are doing, our services and events which may be of interest to you. If you have already consented to receive our marketing information or newsletters, you can change your mind and unsubscribe at any time by using the unsubscribe link on the email.

## Your rights

You have the following rights:

- the right to be informed
- [the right of access](#)
- The right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling
- the right to lodge a complaint with the Information Commissioner's Office (ICO)

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to do this. However in a few cases some of our website features may not function as a result.

## Data Privacy Impact Assessment (DPIA)

A DPIA is a process to comprehensively analyse our processing to identify and minimise the data protection risks of a project. They are a legal requirement for processing that is likely to be high risk. To view our DPIA's please email [dpo@sutton.gov.uk](mailto:dpo@sutton.gov.uk)

## Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this webpage. This privacy policy was last updated on May 2018.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you [by email](#) or write to us at: Data Protection Officer, London Borough of Sutton, Civic Offices, St. Nicholas Way, Sutton SM1 1EA.

If you would like to know more about your rights under the Data Protection law, and what you should expect from us, visit the [ICO's website](#).

## Council tax, business rates and benefits

We will use your information to:

Activity	Legal basis
Process housing benefit and council tax reduction claims	Legal obligation
Collect council tax and business rates	Legal obligation
Text messaging reminder service	Consent
Administer discretionary housing payments and local social welfare schemes	Legal obligation Public task
Participate in the National Fraud Initiative and other data matching exercises	Legal obligation Public task

We may share your information with:

- the Cabinet Office
- the Department for Work and Pensions
- the Home Office
- credit agencies - <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>
- external bailiff companies
- Office National Statistics (ONS)

## Sutton College

We will use your information to:

Activity	Legal basis
Learner and staff information	Legal obligation Public task Consent
Supplier information	Legal obligation Public task

We may share your information with:

- The Education and Skills Funding Agency
- Subcontractors that may be delivering learning to you
- Auditors
- Companies contracted to collect data we need to fund your learning
- E-Learning provider
- National Careers Service
- Awarding bodies
- Community learning partners you may be in learning with

## Local place and engagement

We will use your information to:

Activity	Legal basis
Run and administer the local committees	Public task
Process neighbourhood grants and event fees and charges grant	Public task
Process public realm schemes	Legitimate interest

We may share your information with:

- Idverde
- Veolia

## Pensions administration

We will use your information to:

Activity	Legal basis
Administer the Local Government Pension Schemes of the Sutton and Kingston pension funds	Legal obligation Public task
Assess eligibility for, calculate and provide you with benefits	Legal obligation Public task
Carry out statistical and financial modelling	Legal obligation Public task

We may share your information with:

- the Cabinet Office
- the Department for Work and Pensions
- the Government Actuary's Department
- HM Revenue and Customs
- scheme employers and their payroll providers
- actuaries
- auditors
- other pension funds
- the schemes' additional voluntary contribution providers
- tracing bureaus
- software providers (including Civica)

## Asset management

We will use your information to:

Activity	Legal basis
Market properties for sale or to let	Consent
Enter into arrangements to let, sell or buy interests in land and property	Consent Legitimate interests
Manage properties in Council ownership	Legal obligation Legitimate interests
Collect rent and other outgoings	Legal obligation Legitimate interests
Acquire property by compulsory purchase	Public task Legitimate interests

We may share your information with:

- Government departments
- local authorities with whom we share services
- external advisers
- credit agencies
- bailiff and other collection services

## Insurance (including compensation claims)

We will use your information to:

Activity	Legal basis
Handle compensation claims made against us or our partners	Legal obligation Legitimate interests
Prevent and detect fraud	Legitimate interests
Administer our tenants contents insurance scheme	Contract

We may share your information with:

- the Cabinet Office
- the Department for Work and Pensions
- insurers
- claims handling providers
- loss adjusters and investigators
- actuaries
- insurance brokers
- legal providers
- the MIB Group (fraud and insurance database provider)
- Nationwide Accident Repair Services (motor repair provider)
- JCAD (software provider)

## Child social care

We will use your information to:

Activity	Legal basis
Collate information from a variety of providers to inform an assessment and analysis of the needs of children and families (Children Act 1989, s 17)	Legal obligation Vital interest
Safeguarding vulnerable children and young people (Children Act 1989, ss 17, 32 and 47; Children and Adoption Act 2002; Fostering Regulations 2011 and 2015; Care Act 2014; Children (Leaving Care) Act 2000)	Public task Legal obligation plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
Providing a proportionate intervention to vulnerable adults, children and families	Legal obligation Public task
Participate in the national fraud initiative and other data matching exercises	Legal obligation Public task Legitimate interest
Working with families at Tier 2, i.e. below statutory threshold (Children Act 1989, s 17)	Consent
The provision of mental health support and children with disabilities services	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
<a href="#">Participate in the Early Help Troubled Families programme</a>	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care

We may share your information with:

- the Department of Health and Social Care
- the Department for Education
- the Department for Work and Pensions
- the Home Office
- The Ministry of Housing, Communities & Local Government
- HM Courts & Tribunals Service
- Schools
- the Citizens Advice Bureau
- Probation
- Housing
- Jobcentre Plus
- Adult social services
- Fraud department
- Youth offending team
- Charities

#### The Child Protection Information System (CP-IS)

Sutton Council shares information with health and social care organisations for child protection purposes. The information is shared using the CP-IS.

The CP-IS focuses on improving the protection of children who have previously been identified as vulnerable by social services when they visit the following NHS unscheduled care settings:

- Emergency departments
- Walk-in centres
- Out of hours GPs
- Minor injuries units
- Paediatric wards
- Maternity units
- Ambulance services

The system provides health professionals with prompt and easy access to key social care information that can help them to assess whether a child is at risk.

The ability to correctly diagnose abuse or neglect depends on having the whole picture. Giving staff in unscheduled care settings access to relevant social care information is essential to successfully identifying children who may be at risk.

## Registrar services

We will use your information to:

Activity	Legal basis
Create legal records of births, deaths and marriage registrations	Legal obligation
Share data for Citizenship purposes	Legal obligation

We may share your information with:

- Her Majesty's Passport Office (including the General Register Office)
- the Office for National Statistics
- the Home Office

## Adult social care

We will use your information to:

Activity	Legal basis
The provision of direct adult social care	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
To safeguard vulnerable adults	Vital interest plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
<a href="#">Participation in the National Fraud initiative</a>	Legal obligation
<a href="#">Sutton integrated digital care record</a>	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
<a href="#">Use of your NHS number in adult social care</a>	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care
<a href="#">Participate in the Early Help Troubled Families programme</a>	Public task plus GDPR Article 9(2)(h) - Processing is necessary for the provision of Health and Social Care

[Connecting Your Care](#)

Public task plus  
GDPR Article 9(2)(h)  
- Processing is  
necessary for the  
provision of Health  
and Social Care

We may share your information with:

- Care providers
- Health partners
- the voluntary sector
- the Home Office
- the Cabinet Office
- Fraud department
- Royal Marsden Community Services
- Child social services
- HM Courts & Tribunals Service
- Other providers of direct care services

Sutton Health and Care Integrated Services

Sutton Health and Care is an integrated model of care - supported by a membership of organisations including:

- Sutton GP Services Limited
- Epsom & St Helier University Hospitals NHS Trust
- London Borough of Sutton
- Sutton Community Services and
- St George's Mental Health NHS Trust

With the aim of bringing together one model of care for the population of Sutton, there are two key workstreams:

1. Preventative and Proactive care. Proactive care in the community preventing unplanned hospital admissions.
2. Reactive care. Direct support to elderly patients admitted into hospital.

To support this work, SHC organisations listed above will identify people who would benefit from being supported in this integrated way of working. Lists of clients will be shared to identify people that are currently being supported by more than one organisation or those that should be. For

example, staff from Adult Social Services and Community Services in Wallington will work in a joined up way to provide proactive direct care. To support this, lists of Wallington clients will be shared between Adult Social Services and Community services on a regular basis. People known to both organisations, will be supported in a joined-up way. Also in St Helier hospital there is an integrated team representing SHC organisations to support people in the hospital. This team will work together and share information to understand how to best support the most effective discharge from hospital. The integration of these services means that direct care is delivered much more efficiently.

## Events safety

We will use your information to:

Activity	Legal basis
Process event documentation	Legal obligation Public task

We may share your information with:

- The London Fire Brigade
- The Metropolitan Police Service
- The London Ambulance Service
- Epsom and St Helier University NHS Foundation Trust
- Transport for London
- The British Transport Police
- St John's Ambulance Service
- Surrounding local authorities (if the event is cross borough or may impact on another borough)

## Sutton Life Centre

We will use your information to:

Activity	Legal basis
Gather information for bookings of meeting rooms, events spaces, sports pitch, and Life Skills Tours in order to meet customer requirements and to issue invoices. Information gathered includes, name, address, organisational name, phone number, email address and booking requirements.	Contract
Gather basic health and safety information for children visiting the Life Skills Tours which may impact on the delivery of the tour, such as accessibility requirements, and whether there are any aggravating conditions that may be triggered by the audio visual elements of the tours, including photosensitive epilepsy, motion sickness, phobias or any other conditions deemed relevant. <b><i>This information will not be shared with any other parties.</i></b>	Legitimate interest*
Gather feedback from customers about their experience in order to make improvements to service delivery.	Consent
Gather testimonials from customers about their experience or school visit which can be used on our website or for marketing purposes.	Consent
Send out information to users who have subscribed to one of our newsletters.	Consent
Monitor activity within the centre via CCTV for the prevention and detection of crime and safeguarding.	Legitimate interest*

\*Legitimate Interest Assessment (LIA) needs to be recorded for any legitimate interest items.

We may share your information with:

- Metropolitan Police
- External bailiff companies

## Community safety

We will use your information to:

Activity	Legal basis
Prevention and detection of crime.	Legal obligation
To keep you updated on news, advice, meetings, and events relating to crime and community safety.	Public task
To contact you in event of incident so that we can monitor community tension and cohesion.	Public task
Contact you in the event of an incident to fulfill a volunteer emergency response role.	Public task

We may share your information with:

- Metropolitan Police Service & Police Authority
- Sutton's Clinical Commissioning Group
- National Probation Service
- Probation Community Rehabilitation Company
- London Fire & Emergency Planning Authority
- Mayor's Office for Policing and Crime
- Registered Social Landlords
- Voluntary and Community Groups

## Parking

We will use your information to:

Activity	Legal basis
Penalty Charge Notices (PCNs) issued and enforced	Legal obligation Public interest
Issue and management of parking permits	Public interest
Issue and management of car park access (multi-story and surface)	Contract
Issuing and processing of parking suspensions and dispensations	Public interest
Application and installation of access bars and disabled bays	Public interest
Detection, investigation and prosecution of Blue Badge misuse	Legitimate interest Legal obligation
Detection, investigation and prosecution of fraud offences relating to the above activities	Legitimate interest Legal obligation

We may share your information with:

- Law enforcement agencies in connection with any investigation to help prevent unlawful activity
- London Tribunals (ETA)
- The Traffic Enforcement Centre (TEC)
- Collection Agencies/Enforcement Agents
- Providers of parking enforcement and parking management services
- Providers of print and post services
- Payment providers
- Cashless parking solution providers
- DVLA
- Other council services
- Sutton Housing Partnership (SHP)
- Other Local Authorities

## Libraries, Heritage and Arts

We will use your information to:

Activity	Legal basis
Provide you with a library card so you can use the Library Service	Contract
Record your use of the Library Service, such as what books you have read and what charges or payments you may have made	Contract
Text or email you (if you have opted in) about your loans and reservations	Consent
Receive and provide information about your library activity from our third-party suppliers, such as our self-service providers or the computer booking service. We will also share your information with other authorities within the London Libraries Consortium in order to provide you with the Library Service.	Consent
Sutton Libraries are part of the London Libraries Consortium, so, when you join Sutton Library Service, you are agreeing to join the Consortium and your information and data will be seen and shared by all authorities within the consortium. Your data may also be used for training, testing and quality purposes. Joining the consortium will provide you with access to the stock and services across the consortium and you will be able to reserve and request any item available on the catalogue. You will also be able to use your Sutton Library card in any of the London Library Consortium libraries. You can find out more about the London Libraries Consortium <a href="#">here</a> .	Consent

We may share your information with:

- Law enforcement agencies in connection with any investigation to help prevent unlawful activity
- London Tribunals (ETA)
- The Traffic Enforcement Centre (TEC)
- Collection Agencies/Enforcement Agents
- Providers of parking enforcement and parking management services
- Providers of print and post services
- Payment providers
- Cashless parking solution providers
- DVLA

- Other council services
- Sutton Housing Partnership (SHP)
- Other Local Authorities including those within the London Libraries Consortium