

# Thurrock Council – Service-level privacy notices

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Within these notices we cover subjects such as:

- why we collect personal information
- the information we collect
- purpose of processing your information
- other ways we may use your information
- who we may share your information with
- how long we keep your information

Service-level notices should be read together with our main privacy notice, [thurrock.gov.uk/privacy](http://thurrock.gov.uk/privacy)

# Adult social care

## Why we collect personal information

The Care Act 2014 and the Chronically Sick and Disabled Persons Act 1970 place a duty on Thurrock Council to work closely with Health colleagues to ensure the best level of care is delivered to our residents and service users.

## The information we collect

To supply the above service and other services related to adult social care, we collect the following information from you directly or from internal council departments and external agencies:

- name
- address
- date of birth
- relationships information
- health information
- referral/assessment information
- relevant case information
- mental capacity information
- contact details
- other agencies involved
- financial information
- next of kin
- ethnicity
- gender
- National Insurance number/child registration number
- driving licence number
- vehicle details
- National Health Service (NHS) number
- details of care received (care package line items)
- Blue Badge details
- Universal Property Reference Number (UPRN)
- photographs
- place of birth
- email address
- proof of identity – for example, passport, birth certificate, marriage or divorce certificate, civil partnership or dissolution certificate

## Purpose for processing your information

We process your information to:

- deliver adults social care services to our service users
- detect and prevent crime, including fraud
- ensure the safety and protection of a vulnerable adult
- process and issue Blue Badges

## **Other ways we may use your information**

Data Profiling – this is when your information is summarised and examined to enable us to tailor the services, we supply to meet your specific needs.

## **Who we may share your information with**

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, required by law, or to prevent and detect fraud. Partner organisations we share your information with include:

- health agencies
- Department of Welfare and Pensions
- Police
- education providers
- other councils
- NHS Digital
- care agencies and all other partners supply care and support to the service user
- auditors Skills for Care

## **How long we keep your information**

The length of time information will be kept before being deleted depends on the service being provided. Specifically:

- joint reablement services' information will be kept for the length of the service supplied and 25 years after closure of the service
- adult services' information will be kept for 8 years after death or after contact is ceased for non-mental health cases, and 10 years after death or after contact is ceased for mental health cases – this can also be extended to 25 years if the potential for recurrence in needing support is high
- information related to children will be kept from between 25 years to 75 years after contact has ceased
- customer financial information will be kept for 6 years after service is stopped

## **Use of your NHS Number in adult social care**

If you are receiving support from adult social care, then the NHS may share your NHS number with Adult Social Care. This is so that the NHS and adult social care are using the same number to identify you whilst supplying your care.

By using the same number, the NHS and adult social care can work together more closely to improve your care and support. We will use this number in an integrated care record system across a number of support services including:

- GPs
- hospitals
- community matrons
- district nurses
- social care practitioners

If you wish to opt-out from the use of your NHS Number for social care purposes, please speak to your social worker or email [information.matters@thurrock.gov.uk](mailto:information.matters@thurrock.gov.uk)

# **Children's services – education (including adult education services)**

## **Why we collect Personal Information**

Thurrock Council is required under the following legislation to supply education services:

- Education Act 1996
- Children's Act 1989
- Children's Act 2004
- Children and Families Act 2014
- Education Act 1998
- School Admissions Code

## **The information we collect**

To enable us to supply Education services we collect the following information from you directly or from internal council departments and external agencies.

Children's information:

- name
- address
- date of birth
- health information
- contact details
- education information
- foster carers address
- contact details of heads of schools and designated teacher
- family information
- religious information
- police involvement
- safeguarding information
- child minders' names, addresses and contact details
- parents' marital status
- National Insurance number for parents
- NHS numbers
- Unique Pupil Number
- school year
- gender
- free school meal eligibility
- first language
- special educational needs information
- social care information

## **Who we share your information with**

We may share your personal data between our services and with partner organisations, when it will be of benefit to you, required by law, or to prevent and detect fraud.

The partner organisations we may share your information with include:

- Police
- education providers
- government bodies including Department of Education
- other council services
- fostering and care agencies
- NHS where applicable, including midwives and health visitors
- child minders
- transport department
- youth offending teams
- other councils

## **Purpose for processing your information**

We process children's information:

- to create a personal educational plan for looked after children from ages 3 to 18
- to process and supply home to school transport services
- to advertise child minders' services online
- to supply children activity group information
- to process school applications and place children into schools
- to enable payments for early years free education and to check eligibility
- to conduct early years census
- to inform childcare sufficiency
- to monitor truancy and identify children who are not registered in any school
- to produce statistics for reports to elected members, Cabinet, Council and freedom of information requests

## **How long we keep your information**

Children's information will be kept for up to 35 years from the date of birth, dependent on the reason for intervention. Where a child is known to children's social care, the information will be kept up to 75 years from date of birth.

Catering Services staff information will be kept for 12 months after they cease to be employed.

# Children's services – social care

## Why we collect personal information

Children Act 2014 places a duty on us to work closely with other agencies to ensure that children are safeguarded and protected from harm and abuse.

## The information we collect

To enable us to supply services related to children's social care we collect the following information:

- name
- address
- date of birth
- relationships information
- health information, including mental health information
- referral and assessment information
- relevant case information
- contact details
- other agencies involved, including NHS and Police
- financial information
- risks
- next of kin
- ethnicity
- gender
- disability
- sexuality
- family background and history

## Purpose of processing your information

Purposes for processing your information are:

- to deliver children's social care services
- to prevent and detect crime and fraud
- to safeguard and protect children
- to conduct psychological, psychiatric, parenting and independent social worker assessments

## Who we share your information with

We may share your personal data between our services and with partner organisations, when it will be of benefit to you, required by law, or to prevent and detect fraud.

The partner organisations we may share your information with include:

- health agencies
- Department for Work and Pensions
- Police
- children's social care
- adult social care

- education providers
- other councils
- care agencies and providers
- adoption agencies and providers
- fostering agencies and providers
- courts
- legal team

## **How long we keep your information**

We keep information for 75 years from last contact with the young person.



# Environment and highways

## Why we collect personal information

We are required under the following legislation to provide services in relation to Environment, Transport and Highways:

- Education Act 1996
- Concessionary Bus Travel Act 2007
- Environmental Protection Act 1990
- Highways Act 1980
- Local Authorities Cemeteries Order 1977
- Local Government Act 1972
- Registration of Burials Act 1864
- The Prevention of Damage by Pests Act 1949
- Traffic Management Act 2004
- Transport Act 1985
- Transport Act 2000
- Vehicle Excise and Registration Act 1994

## The information we collect

To enable us to provide these services we may collect the following information from you directly or from internal council departments and external agencies:

- name
- next of kin details
- carer or guardian details
- address
- health and medical information
- contact details
- date of birth
- image of applicant
- driving licence number
- licence restrictions
- driving licence endorsements
- electronic and photocopy of driving licence
- National Insurance number
- car registration number, make and model
- family information
- religious information
- police records
- safeguarding information
- details of any accidents
- insurance records and claims
- transport operators' information, including financial data where they are sole traders
- CCTV recording – video and audio
- aerial video and photographic images captured by an unmanned aerial system (UAS)

## Purpose for processing your information

Information is processed to:

- respond to service requests and complaints and keep individuals updated on matters reported
- investigate environmental crimes and enforce planning, transportation and public protection interventions
- manage the database of schedules for work packs relating to environment operational duties – street cleansing, grounds maintenance and waste collection
- confirm residents are eligible for assisted collections and ensure the service is provided
- monitor the level of usage of the Household Waste and Recycling Centre
- process permits for van-like vehicles to access the Household Waste and Recycling Centre
- process National Concessionary Bus Pass applications and manage the service
- process education home-to-school transport and manage the service
- process clearance checks for drivers and escorts who work in, or for, our school transport services
- maintain records of drivers who drive council vehicles and fulfil the conditions of the council's transport operators' licence
- keep records of evidence for insurance and legal claims and assist authorities with investigations in the event of an accident or incident
- process Penalty Charge Notices
- keep records of burial plot ownership

## **Who we share your information with**

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, required by law, or to prevent and detect fraud. Partner agencies we will share your information with include:

- government bodies – for example, the Driver and Vehicle Licensing Agency (DVLA)
- Police
- transport operators
- insurance companies
- debt collection agencies
- Disclosure and Barring Service (DBS)
- schools and colleges
- undertakers and stone masons

## **How long we keep your information**

Information will be kept as follows:

- data captured to investigate environmental crimes and enforce planning, transportation and public protection intervention areas will be kept for 6 years following the conclusion of the prosecution
- drivers of Thurrock Council's fleet of vehicles will be kept for 3 to 7 years after a driver has left Thurrock and vehicle is disposed
- highways information will be kept for a period of between 3 and 20 years
- National Concessionary Bus Pass information will be kept for a period of 7 years
- school transport services information will be kept until a child reaches the age of 21 years
- vehicle registration number information from the automatic number plate recognition system will be kept for no longer than 2 years after the date of capture
- penalty charge notices will be kept for 7 years after first issued
- burial plot ownership information will be kept throughout the period of plot ownership

# Environmental enforcement

## Why we collect personal information

We are required under the following legislation to provide enforcement services in relation to environmental crime and anti-social behaviour (ASB).

- Environmental Protection Act 1990
- Anti-social Behaviour, Crime and Policing Act 2014
- Clean Neighbourhoods and Environment Act 2005
- Vehicle Excise and Registration Act 1994
- Highways Act 1980
- Road Traffic Act 1991
- Refuse Disposal Amenity Act 1978
- Town and Country Planning Act 1990
- Anti-social Behaviour Act 2004

## The information we collect

To enable us to provide these operational services we collect the following information from you directly or from internal council departments and external agencies:

- name
- address
- business name and address
- email address
- telephone details
- employer details
- medical information
- bank and building society details
- proof of vehicle ownership
- proof of residency
- body camera footage and photographic images of individuals and vehicles used in the commission of offences.
- any other information provided related to issuing, processing, and appealing a Fixed Penalty Notice (FPN)

## Purpose for processing your information

It is necessary for the council to gather, collect, store and process personal information relating to all investigations and claims. The council puts measures in place to protect the privacy of individuals throughout the process.

Processing includes the provision of administrative and operational services for the enforcement of environmental and ASB-related criminal offences.

## Who we share your information with

We may share your personal data between our internal services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to the individual,

required by law, or to prevent and detect fraud. Partner agencies we will share your information with include:

- other departments in the council
- other councils
- Police
- government departments such as HMRC and the Cabinet Office (as part of the National Fraud Initiative)
- Border Force
- immigration services
- Driver and Vehicle Licensing Agency (DVLA)
- Transport for London

We will only share your information with internal departments and other service providers, contractors and/or partners when necessary.

### **How long we keep your information**

The council will only keep your information for as long as necessary.

We will keep your data safe and secure in line with our retention policy which is 6 years. After this time, it will be securely deleted from the systems.

# Finance services

## Why we collect personal information

We are required under the following legislation to supply services in relation to Counter Fraud & Investigation, Insurance, Creditors, Debtors and Revenue & Benefits

- Crime and Disorder Act 1998
- The Council Tax (Administration and Enforcement) Regulations 1992
- The Council Tax (Administration and Enforcement) (Amendment) Regulations 1997
- Local Government Finance Act 1992
- The Income Support (General) Regulations 1987
- MOJ Reforms and Lord Justice Woolf Reforms
- Council Tax the Council Tax (Administration and Enforcement) Regulations 1992
- Local Government Finance Act
- The Housing Benefit Regulations 2006
- Relevant provisions in the LED

## The information we collect

To enable us to supply these services we collect the following information from you directly or from internal council departments and external agencies:

- name
- address
- date of birth
- any known aliases
- Police national computer record checks
- contact details
- National Insurance number
- benefit reference numbers, where applicable
- bank details
- passport numbers
- driving licence number
- next of kin's details
- National Health Service number
- place of birth
- deed poll papers, if name changed
- birth certificates
- marriage certificates
- medical and health information
- photographs
- employment details and status
- financial information
- household composition
- self-employment registration
- Inland Revenue registration to make payment

## Purpose for processing your information

We process your information to:

- prevent and detect crime and fraud
- comply with legal obligations
- process Housing benefit applications
- bill residents of Thurrock for council tax
- establish, exercise or defend an insurance claim
- process all financial transactions, including payments, grants, and benefits

## **Other ways we may use your information**

Data Profiling – this is when your information is summarised and examined to enable us to make informed decisions about the services, we provide to you.

## **Who we share your information with**

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, required by law, or to prevent and detect fraud. Partner organisations we share information with include:

- government departments – for example, HM Revenue and Customs, Department of Work and Pensions
- debt collection agencies and credit agencies
- other departments in the council
- courts
- other councils
- insurance companies
- loss adjusters
- legal representatives
- contractors

## **How long we keep your information**

We will keep your information as follows:

- counter fraud and investigation information will be kept for 6 years
- insurance will be kept 7 years
- revenue and benefits information, including processing of all financial transactions, council tax and national non-domestic rates, will be kept permanently following guidance in Local Government and Social Care Ombudsman Decision 19 000 896

# Housing services

## Why we collect personal information

The Housing Act 1988 as amended by the Housing Acts 1996 and 2004 places a duty on Thurrock Council to work closely with our stakeholders and colleagues to ensure the best level of service is delivered to our service users.

## The information we collect

To enable us provide housing services, we will collect the following information:

- name
- address
- date of birth
- National Insurance number
- relationships information
- health information
- referral / assessment information
- relevant case information
- mental capacity information
- contact details
- other agencies involved
- financial information
- next of kin
- rent account details
- equality and diversity information
- CCTV recording – video and audio

## Purpose for processing your information

Information is processed to:

- deliver and improve housing services
- collate anonymous statistical data
- prevent and detect crime, including fraud
- target enforcement activities
- target potential services users who may benefit from the take up of relevant services
- maintain accounts of our service users
- keep service users informed and updated

## Who we share your information with

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, required by law and to prevent or detect fraud. Partner organisations we share your information with include:

- health agencies
- other government departments – for example, Department for Works and Pensions, Department of Levelling Up, Housing and Communities, and Department for Energy Security and Net Zero
- Police

- registered housing providers and landlords
- energy partners
- other councils
- research companies

## **How long we keep your information**

We will only hold your records during the period of our relationship with you and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us – for example, if you live in one of our properties, we will hold information about you for the duration of your tenancy.

If you move and are no longer a resident, we will usually keep records about you for up to 12 years

Information will be kept as follows:

- private housing records for loans against a property are kept indefinitely
- private housing records for disabled facility grants are retained for 10 years from issue of the grant
- private housing records for adaptation grants are retained for 7 years after the adaptation is completed
- private landlord records are retained for 5 years from when the engagement is completed
- private housing records for schemes funded by the Department for Levelling Up, Housing and Communities and the Home Office are retained for 2 years of the closure of the scheme unless otherwise specified
- expired private housing licence records are retained for 7 years



# Parking

## Why we collect personal information

We are required under the following legislation to provide services in relation to parking.

- Traffic Management Act 2004

## The information we collect

To enable us to provide these services we collect the following information from you directly or from internal council departments and external agencies:

- name
- address
- business name and address
- email addresses
- telephone numbers
- vehicle registration number
- proof of vehicle ownership
- proof of residency
- body camera footage and photographic images of your vehicle
- any other information provided related to issuing, processing and appealing a Penalty Charge Notice (PCN)

## Purpose for processing your information

Thurrock Council collects and processes information for the administration of parking permits and requests for parking suspensions. Processing of information in this context includes but is not limited to:

- collection
- organisation
- retrieval
- consultation
- use
- deletion or destruction
- disclosure to other agencies

Processing includes:

- provision of administrative and statutory services for the enforcement of parking restrictions
- administration of parking permits
- administration of paid for parking services
- administration of parking suspensions

## Who we share your information with

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to the individual, required by law, or to prevent and detect fraud.

Partner agencies we will share your information with include:

- internal council services and other local authorities
- Police
- Border Force
- immigration services
- Traffic Penalty Tribunals
- The Traffic Enforcement Centre at Northampton County Court
- enforcement agents

We will only share your information with internal departments and other service providers, contractors and/or partners when necessary.

## **How long we keep your information**

We will only retain your personal information for as long as necessary. We will keep your data safe and secure in line with our retention policy. After this time, it will be securely or deleted from the systems.

The record of penalty charge notices issued may be kept for up to 6 years to pursue debt under the Traffic Management Act 2004.

Parking permits, suspensions and dispensation information will be held for as long as is required to provide an effective service to our service users and customer.

# Planning, transport and public protection services

## Why we collect personal information

We are required by legislation and as a public task to:

- establish and maintain a record of the authority's physical assets – for example, buildings and lands
- provide planning and building control services
- meet regulatory, licensing and enforcement requirements
- provide tenancy management services

The legislation includes:

- legislation relating to planning and public protection services
- Landlords and Tenant Act 1954

## The information we collect

To enable us provide these services we collect the following information from you directly or from internal council departments and external agencies:

- name
- financial information
- address
- contact details
- photographs
- special educational needs information
- nature of complaint, enquiry or application
- payment methods and refunds

## Purpose for processing your information

Information is processed to:

- manage the council's physical assets
- manage tenancies
- process complaints, enquiries and applications

## Who we share your information with

We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, required by law, or to prevent and detect fraud.

Partner organisations we may share your data with include:

- suppliers of the databases, systems and services we use for providing the above services
- consultees

## How long we keep your information

Information will be kept as follows:

- physical asset management – there is a requirement to keep information related to leases indefinitely, however, the information is reviewed on a regular basis to update ownership
- accession records are kept indefinitely to enable us fulfil our legal obligations
- tenancy management services information will be kept indefinitely to enable us fulfil our legal obligations
- regulatory, licensing and enforcement services information is kept indefinitely to enable us fulfil our legal obligations

# Registration, museum, theatre and customer services

## Why we collect personal information

We are required under the following legislation to collect information relating to birth, deaths, marriages and civil partnerships:

- Births and Deaths Registration Act 1953
- Registration of Births, Deaths and Marriages Regulations 2009

We may also collect information to:

- enable our Contact Centre to signpost people and provide relevant council services
- establish and maintain museum records and services
- provide theatre services

## The information we collect

We collect:

- birth, death and marriage registrations, including archived records
- registration and ceremony appointments
- information to process enquiries, applications, and complaints
- information relating to bookings and events
- volunteer information

## Purpose for processing your information

We process your information to:

- provide services in relation to marriage, civil partnerships, birth and death registrations
- process enquiries, applications and complaints made to the Contact Centre and refer callers to the relevant Council Services
- manage and provide services in relation to Thurrock Museum and Museum collections
- manage and provide services in relation to the Theatre

## Other ways we may use your information

We may use your information to:

- register statutory services – births, deaths, marriages and civil partnerships
- provide non statutory services – Nationality Checking Service and citizenship ceremonies

## Who we share your information with

- Information may be shared with other council departments so as to process enquiries, applications and complaints and also for the notification of deaths.

## How long we keep your information

Information may be kept as follows:

- births, deaths and marriage registrations certificates are archived and kept indefinitely due to legal reasons
- archived birth, death and marriage records are archived and kept indefinitely
- information relating to registration appointments and ceremony bookings will be kept for 2 years
- complaint information will be kept for 6 years from conclusion, or 75 years for children in care complaints
- compliments and customer satisfaction surveys are kept for 6 years
- theatre services information will be kept for 6 years
- museum information will be kept for 6 years

## **Use of artificial intelligence (AI) for service user engagement**

We use a Virtual Assistant powered by AI to answer some incoming calls to the Contact Centre. The Virtual Assistant may:

- understand the caller's query and try to answer it
- transfer or direct callers to another service
- provide information over the phone
- text links to the caller to relevant information on the council's website
- take a caller's details and sending them written information or paper copies of forms where the caller cannot access online services
- use information from calls to improve the Virtual Assistant service (e.g. by building its vocabulary based on the phrases callers use and feedback received)
- integrate with other council computer systems to verify the caller is who they say they are, and in some circumstances, update records in those systems as requested by the caller, e.g. if they want to make an application for a service over the phone

Callers are asked if they want to provide feedback. This is optional, but the feedback is used to train the Virtual Assistant to continuously improve the quality of the service it provides.

## **Safeguards**

There are a number of safeguards in place to protect callers, including:

- callers can ask to be transferred to a human advisor at any point during the call
- the Virtual Assistant is designed to analyse callers' sentiments and offer to transfer them to an advisor if it detects frustration or anxiety
- there is a Vulnerable Person's process where the VA analyses the caller's sentiment and proactively offers to transfer the person to a human advisor if they seem confused
- the Contact Centre will be monitoring feedback from callers to identify any issues so they can be resolved quickly

## **Automated decision-making**

The Virtual Assistant will make simple transactional decisions based on what the caller tells it. For example, if they say they cannot receive texts on their current number, it will ask them if they have an alternative number, and if so, text that number instead. It will not make any decisions about service levels or service delivery to a particular caller.

Where the Virtual Assistant needs to process personal data such as the caller's phone number, or name and address, it does so strictly for the sole purposes given above and does not combine it with third-party data related to service users.