

# Privacy Notice for the Chatbot Housing Advice Tool (CHAT) Project

## 1. Introduction

The Centre for Homelessness Impact (CHI), Southwark Council, Change Please and King's College London (KCL) ("we", "us", "our") are working together to understand the impact an AI advice giving tool could have on the volume of homelessness duties owed by Southwark Council within the period of a year. Together we are known as the data controller.

The project is being funded by the Cabinet Office's Evaluation Accelerator Fund which is designed to support evaluation across government to transform understanding of the impact of activity in priority policy areas such as homelessness.

The Change Please AI Assistant (CPAI) tool is a web-based tool designed to support people at risk of homelessness before a crisis occurs. It uses AI, to provide tailored advice based on materials from Shelter, Citizens Advice, GOV.UK, Law Works, Legislation.gov.uk, and the council's own housing pages.

CPAI offers personalised support through interactive checklists, decision trees, and direct referrals to local housing teams for high-risk cases. It can generate custom letters (e.g. to landlords or bailiffs) and provides flexible, multilingual, and out-of-hours support. None of your personal information is used by the AI tool.

To be able to evaluate the effectiveness of the tool we need to use a minimal amount of your personal data to be able to conduct the evaluation.

Because we are using information about you, which is known as your "Personal Data", we need to give you this privacy notice. It is written into law that we provide this information to you. We have also completed a risk assessment for the uses of personal data in the project to ensure we protect your information throughout.

The project findings will be written into a final report. The report will not contain anyone's names. All the information used in the project is confidential and your personal data cannot be used for anything else.

The rest of this document explains everything you need to know about how your personal data will be used if you decide to take part. You can always ask your case worker or email [dpo@homelessnessimpact.org](mailto:dpo@homelessnessimpact.org) if you have any questions.

## 2. What personal data will we collect and how?

The personal data listed below has been collected by Southwark Council in the performance of their legal duties as a council and held in the - this is known as the Low Income Family Tracker (LIFT) - <https://policyinpractice.co.uk/low-income-family-tracker/>.

Only the following personal data has been used for this Project by Southwark Council:

- Name; contact details (email, telephone number), post code;
- Awareness that assistance of this kind might be helpful

The personal data listed will be collected by Change Please to allow you access to their AI tool and encourage its use:

- Name; contact details (email, telephone number), post code;
- Information you write in the AI tool;

- Mandatory data if we think we can help you: First line of your address
- Non-mandatory fields (helpful if we think we can help you): Date of birth, National Insurance Number

The personal data listed will be collected by the King's College London researchers:

- Name; Email Address;
- Answers you provide within a survey; and
- Whether the local council owe you a 'prevention or relief duty' and if they have given you advice in the last 12 months;
- Any information volunteered in an interview we may have with you (if you agree to being contacted for an interview).

### 3. How we will use your personal data

The table below is an outline of all uses of your personal data and the basis in law for our use of your personal data.

Uses of Personal Data	Lawful Basis for Processing
<p>To evaluate if providing low income families in the Southwark Council area easier access to housing advice and information about homelessness prevention via an AI tool causes a reduction in the number of homelessness applications received by Southwark Council.</p> <p><b>NOTE:</b> Personal Data is not being used to train any AI models and is never used by the AI tool.</p>	<p>The lawful basis we will be relying on is that the processing is necessary for a task in the public interest, also known as 'Public Task' (UK GDPR Article 6.1 (e)).</p>
<p>To provide you tailored housing advice using the AI tool. Use of the AI tool will generate risk scores to identify households at high risk of homelessness, and any usage statistics will be used within the evaluation.</p>	
<p>To assign families into treatment and control groups for the purpose of making the research fair. This is the randomisation process. The treatment group will be notified about the AI tool and the control group will not.</p>	
<p>As part of the Treatment Group we will use your email and telephone number to send you email and text notifications about the AI tool which are designed to encourage you to use the tool if needed.</p>	
<p>To register your access to the AI tool and allow you to be able to log in again and see what you previously asked and the answer it provided.</p>	



<p>If you decide to use the AI tool, we will send you a survey to complete which will be anonymised.</p> <p>The survey asks if you are willing to be interviewed about the AI tool, not about any housing situation you are experiencing. If you are, we need to capture your email address at least but remove the email address from your survey answers so the survey can be fully anonymous.</p>	
<p>To gather your thoughts and opinions in a survey you may have voluntarily completed including your reasons for using the AI tool. Unless you inform us you are willing to be interviewed about your experience using the AI tool, your answers are automatically anonymous.</p>	
<p>To invite you to participate in an interview about the AI tool if you have told us you are happy to be interviewed.</p>	
<p>To ask for your ethical consent for participation in the interview. If you are not able to provide your consent we will not be able to conduct an interview with you.</p>	
<p>To interview you and gather your thoughts and opinions of the AI tool and your reasons for using the AI tool. Your answers will be anonymised and used to inform a report we will be writing into the effectiveness of the AI tool you have used.</p>	
<p>To create statistics for evaluating the AI tool's effectiveness/impact by identifying if your data was the LIFT data at the beginning and/or at the end of the period of use of the tool.</p>	
<p>If you become considered to be at risk of immediate homelessness based on the questions you are asking the AI tool, we are will ask you whether you are happy for your contact details to be shared with Southwark Council for a qualified professional, who can take action to reduce the risk of homelessness to you, to make contact with you. You do not have to accept. If you do allow us to share your contact details with Southwark Council, we will ask you for the first line of your address as something we need for Southwark to identify you in their systems.</p>	<p>The lawful basis CP will be relying on for creation of the pop-up is the legitimate interest of the Data Controller (UK GDPR Article 6.1 (f))</p> <p>For CP to pass Personal Data to Southwark, the lawful bases CP will be relying on is Legitimate Interest (UK GDPR Article 6.1(f)).</p> <p>Upon Southwark receiving the Personal Data, the lawful basis is Article 6(1)(e) (Public Task) pursuant</p>

We will ask for other data to make this process easier although they are not mandatory.	to Southwark's statutory duties under the Homelessness Reduction Act 2017 and related legislation (with the other controllers Processing the Personal Data to assist in the performance of this task).
If there is a discovery of a criminal act and a Party is obligated, under the Crime and Disorder Act 1998 , information will be disclosed to the Police for further investigation.	The lawful basis for this use of Personal Data (GDPR Article 6.1(c) legal obligation) is the Crime and Disorder Act 1998.
Your personal data will be anonymised, so we are able to place the results of this research into an archive for it to be made available to other researchers. Any re-use of anonymised data is within tightly controlled circumstances and secure locations for researchers to be able to have secure access for any future research they are conducting.	The lawful basis we will be relying on is the legitimate interest of the Data Controller (GDPR Article 6.1 (f) Legitimate interests).
To help protect an individual from neglect or physical, mental or emotional harm, or protect the physical, mental or emotional well-being of an individual.	<p>The lawful basis we will be relying on is that the processing is necessary for a task in the public interest, also known as 'Public Task' (UK GDPR Article 6.1 (e)).</p> <p>Special categories of personal data used for the purpose of Substantial Public Interest (Preventing or detecting unlawful acts; Protecting the public; Regulatory requirements) under UK GDPR Article 9.2(g).</p>
To identify personal data and take relevant action upon submission of a data subject rights request.	Processing is necessary for compliance with a legal obligation to which the controller is subject under UK GDPR Article 6.1(c).
To be able to assess any impact on individuals of a data breach.	The legal obligation is the separate obligation under the UK GDPR to comply with the exercise by a data subject of their rights and the separate obligation on a controller to Process Personal Data in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures .

	Special categories of personal data used for the purpose of Substantial Public Interest (Preventing or detecting unlawful acts; Protecting the public; Regulatory requirements) under UK GDPR Article 9.2(g).
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## 4. Sharing your data

Your email address and telephone number will be shared with CHI by Southwark so they can perform a randomisation of the list.

CHI will share the randomised list back with Southwark and share half of the randomised list (those who are in what is known as a Treatment Group) with Change Please. CHI will delete these lists once they have been successfully received.

Where you may have access to the AI tool and have entered text into the tool that might mean you are at high risk of becoming homeless in the short term, Change Please will prompt you within the AI tool to ask for your permission to them your contact details with Southwark so they might provide immediate assistance to you.

To help find people who have used the AI tool and to invite them to have an interview, the user list will be shared with King's College London who will randomly select people to be invited to be interviewed. You do not have to be interviewed if you don't want to be interviewed.

To manage your personal data, we will hold your personal data in email and digital computer storage systems which are secure and configured to protect your personal data and control who has access to them. Digital storage locations include the UK and the EU although your personal data is only accessed from within the UK.

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public authorities in order to safeguard you or someone else or to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

The only other time we may share your personal data is if the project is taken over by another organisation or one of the organisations involved merges or is acquired with the other organisation. This is unlikely to happen although on occasion this can happen for projects like this. All data would be encrypted for any secure sharing that may take place.

At the end of the project an anonymous version of your personal data will be shared with the Office for National Statistics to be part of a data archive managed by CHI.

## 5. How long will we keep your data?

We will never reuse or retain your data unless there is a legal reason for us to do so and we never sell your data. Personal data collected as part of this project will be anonymised or deleted 6 months after the end of the project.

Anonymised data will be archived ready for re-use by other researchers. We ensure there is no way for you to be identified by any data that is placed in the CHI Archive from this Project.

Archived data will be held in the CHI secure archive (CHI Archive) managed by the Office for National Statistics (ONS). Any re-use of this data is subject to the appropriate security safeguards and will be tracked, recorded and have a risk assessment performed before it is made available for anyone to use. Access to this personal data will be via a secure digital location only and not shared outside of the ONS managed location.

## **6. How will we protect your data?**

We use secure IT systems, staff training, and contracts to make sure your data is protected at all times. We review the systems often.

We store all information on very secure computers and only the people working on the project have access to them. We use passwords, encryption, secure storage and access services and secure digital connections such as virtual private networks to protect your data throughout the project.

The only automatic decisions made by a computer using your personal data is if the AI tool notes high risk of immediate homelessness. This automatic decision prompts the AI tool to ask for permission within the chat for us to pass your contact information to Southwark Council.

## **7. Your rights and options**

This is a list of your data protection rights.

- You can see your personal data and can request copies of it and details about how we use it.
- You can ask us to fix or change your personal data if it is wrong or incomplete
- You can to take back your consent for use to use your personal data at any time
- You can say no to us using your personal information if we use it for our own purposes

Additionally:

- We never use your personal data for marketing.
- You can ask us to limit how we use your personal data if:
  - it is not correct,
  - it has been used against the law but you do not want us to delete it,
  - we do not need it anymore, but you want us to keep it for legal reasons
  - if you have already asked us to stop using it but you are waiting for us to confirm.
- In some circumstances you can ask us to delete your personal data and request a copy in a format that can be used by other services.
- You have the right not to have decisions made about you by a computer, if those decisions significantly affect you (e.g. legally).

You will not have to pay a fee to access your personal data (or to use any of the other rights). However, we might charge a fee if your request is unreasonable or too much. Also, we may refuse to comply with the request in such circumstances.

To do any of these things, please contact us at [dpo@homelessnessimpact.org](mailto:dpo@homelessnessimpact.org)



## 8. How to Complain

If you are not happy with the way your data is being handled, we ask that you allow us to respond to your complaint before contacting the regulator.

If you are not satisfied with how we have handled your complaint you can complain to the Information Commissioner's Office. This is their information:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://ico.org.uk/concerns/>.

## 9. Contact us

If you have any questions about the uses of your personal data by any organisation mentioned in this notice, or wish to use any of your rights, then you can contact:

**Organisation:** Centre for Homelessness Impact

**Address:** 58 Victoria Embankment, London, England, EC4Y 0DS

**Email:** [dpo@homelessnessimpact.org](mailto:dpo@homelessnessimpact.org)

## 10. Changes to this privacy notice

We may update this document. We will tell you about the changes if necessary.

Last modified: December 2025