Data Protection Act 2018 (as amended)

**PRIVACY STATEMENT for
Homeless Services**

**Who are we?**Kildare County Council (the Council) is the democratically elected unit of Local Government in County Kildare and is responsible for providing a range of services to meet the economic, social and cultural needs of the people of our County.

In its role as a Housing Authority, the Council, in order to provide the most effective range of social housing services to meet the needs of the citizens of the County will be required to collect, process and use certain types of information about people applying for social housing supports. Depending on the housing service being requested the information sought may include ‘personal data’ as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to the personal circumstances of you (as applicant) and members of your family who may also be part of your application for social housing supports.

In addition, staff may be required, from time to time, to collect process and use certain types of personal data to comply with regulatory or legislative requirements or to carry out functions in the public interest.

 **Why do we have a Privacy Statement?**This privacy statement has been created to demonstrate our commitment that personal data you may be required to supply to us is;

* Obtained lawfully, fairly and in a transparent manner
* Obtained for only specified, identified and legitimate purposes
* Processed for purposes which we have identified or purposes compatible with the purposes that we have identified.
* Adequate, relevant and limited to what is necessary for the purpose for which it was obtained
* Personal data collected and processed must be accurate and (where necessary) kept up to-date.
* Kept only for as long as is necessary for the purposes for which it was obtained.
* Processed in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

**For our Website Privacy Statement see -** [**www.kildare.ie/CountyCouncil/DataProtection/**](http://kildare.ie/CountyCouncil/DataProtection/)

**What is the activity referred to in this Privacy Statement?**
The provision of Homeless Services and social housing supports in performing the Council's role as Housing Authority for the County.

**What is the basis for making the processing of this personal data lawful?**Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Kildare County Council in accordance with Article 6(1) of the General Data Protection Regulation, 2016. Specifically the lawful basis for this process is the Housing Acts of 1966-2009 (as amended or superseded) and regulations and statutory instruments thereunder.

**We require contact details**In order to communicate with you, you will be asked for contact details. You do not have to provide all contact details but providing more, such as email, phone, address, makes it easier to communicate. Please note that to help protect your privacy, we take steps to verify your identity before granting access to personal data. These contact details, combined with other data, may be used to verify your identity.

**What other types of personal data do we need to undertake this activity?**All applicants are required to provide information on the following categories of data (where they are applicable)

* Personal details of applicant and of any spouse or partner including PPS Numbers for all members of your household included on the application form.
* Nationality details of applicant and of any spouse or partner
* Marital details of applicant and of any spouse or partner
* Employment details of applicant and of any spouse or partner
* Income details of applicant and of any spouse or partner
* Details of any other household members seeking accommodation
* Details of any medical or disability grounds which may have a bearing on the application
* Details of the current and historical accommodation arrangements of the applicant
* Details of any other property or land in which applicants have a financial interest
* Details of any public order offences of which the applicant or any member of the household has been convicted

**How is personal data used?**The volume of customers the Council serves and range of housing services we provide requires an IT system to manage customer applications. Data from applications is added to the iHouse IT System (iHouse), the PASS system and hard copy applications and related documentation is scanned to a document management system (iDocs). The information requested on the forms and stored in these systems is relevant to an assessment of your eligibility for a relevant housing service, whether it be Homeless Services, a social housing application, or other services and supports. Access to the data is controlled and restricted to relevant staff involved in assessing and processing the services with other security measures such as user passwords.

**What will happen if the personal data is not provided?**The Council request all of the information contained in the Social Housing support application form, which has been devised by the Department of Housing, Planning, & Local Government for use by all local authorities. In advance of completing the application form you should read the information leaflet which accompanies the form carefully. You should take care to answer all of the questions fully where these are relevant to you and provide the required supporting documentation. Failing to provide a detailed answer to the questions relevant to you or supporting documentation may result in your application being considered incomplete and prevent the Council from accepting your application for this service and for provision of homeless services.

**Am I the only source of this personal data?**In some instances to assist with the delivery of the activity or to comply with regulatory or legislative requirements personal data is sourced from a third party. This **APPLIES** to this activity.

Housing Authority staff may be required, to perform functions under the Housing Acts of 1966-2016, to request and obtain information from the following bodies, for the purpose of clarifying matters related to prospective applicants or occupants or current occupants that may be engaged in anti-social behaviour:

* Another Housing Authority,
* An Garda Síochána,
* The Department of Employment Affairs and Social Protection,
* The Health Service Executive (HSE), and/or
* An Approved Housing Body

**Is personal data submitted as part of this activity shared with other organisations?**The Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required the Council shall have regard to your rights, to the security and integrity of the data and will minimise the data shared.
Personal data may be shared with the agencies listed above in order to obtain further data of relevance to the decision making process regarding housing supports.

**How long is my data kept for?**The Local Authority sector operates under a detailed record retention policy which outlines time periods for which your personal data will be retained and what will happen to it after the required retention period has expired. The National Record Retention Policy for Local Authority Records is available: <http://kildare.ie/CountyCouncil/DataProtection/>

As of January 2018 hard copy documentation submitted with new applications is scanned and then are returned to applicants. However our iDocs and iHouse system must maintain an electronic application history so that we can more effectively engage with you at a later date and all information supplied as part of your application will be retained until such time as a housing allocation is made.

**Do you need to update your records?**

Kildare County Council must take reasonable steps to ensure personal data we have about customers is correct and up to date. If data held by us is found to be inaccurate you have the right to rectify/correct this.
If you find that personal data we have about you is inaccurate or out of date (for instance, you may have changed your name, address, etc.) then please contact us to correct it, by:

**Returning** Summary of Social Housing Assessment forms if and when requested updating your application information.

**Writing to us at**: Kildare County Council, Corporate Services, Áras Chill Dara, Devoy Park, Naas, Co Kildare. W91 X77F

**Emailing us at** customercare@kildarecoco.ie

When making a request to update your records please provide evidence to support this - for example a copy of a document containing your new address – utility (Gas, Electricity, Phone) bill etc. and proof of your identity

**Your rights:**You have the right to obtain confirmation as to whether data concerning you exists, to request access to personal data held about you, to be informed of the content and source of data and check its accuracy.

If the data held by us is found to be inaccurate you have the right to rectify/correct this – see above on how to update your records.
You also, subject to certain conditions being met, have the right to object to or seek restriction of the processing of personal data and to request the erasure of personal data held by the Council.

Please note that to help protect your privacy that we take steps to verify your identity before granting access to personal data.
To exercise these rights logon to [**http://kildare.ie/CountyCouncil/DataProtection/**](http://kildare.ie/CountyCouncil/DataProtection/) , use one of the forms at our Counters or contact us. Completed applications should be returned to:

**Kildare County Council - Access to Information Officer**

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| **Phone** | 045 980 200 |   |
| **E-mail** | dataprotection@kildarecoco.ie or customercare@kildarecoco.ie |  |
| **Postal Address** | Áras Chill Dara, Devoy Park, Naas, Co Kildare. W91 X77F. |  |

**Right of Complaint to the Data Protection Commissioner**
If you are not satisfied with the outcome of the response received by the Council you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.  The Data Protection Commissioner’s website is [**www.dataprotection.ie**](http://www.dataprotection.ie/)or you can contact their Office at:

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| **Lo Call Number** | 1890 252 231 |   |
| **E-mail** | info@dataprotection.ie |  |
| **Postal Address** | Data Protection Commissioner Canal HouseStation RoadPortarlington, Co. Laois. R32 AP23. |  |

 **LAST UPDATED ON: 17th May 2020.**