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<b>Service Area:</b>	Housing Division
<b>Work Area:</b>	Common Housing Register Assessment Team
<b>Contact Details:</b>	Tel: 01443 873587 Email: housingallocations@caerphilly.go.uk
<b>Privacy Notice Name:</b>	Common Housing Register
<b>Description of Privacy Notice:</b>	This privacy notice will explain how Caerphilly County Borough Council will use the information you submit when making an application for social housing under the Common Housing Register.

## How we will use your information

### Source and type of information being processed

#### Source of personal data

As part of the Common Housing Register process, as well as providing information in relation to their particular circumstances, an applicant may provide information in relation to other individuals relevant to the application.

#### Categories of personal data

The categories of personal data / information they may provide in relation to other individuals may include but is not limited to the following categories of personal data:

- Names and dates of birth
- Medical conditions or disabilities
- Care or support needs
- Other support from a third sector organisation
- Financial status
- Criminal conviction(s)
- Anti-social behaviour
- Immigration status
- Entitlement to state benefit(s)
- Employment details
- Tenancy history
- Domestic abuse / fleeing violence or harassment / Child protection

## **Purpose and legal basis for using your information**

### **Purpose of processing**

The information submitted in a Common Housing Register application will be used in order to assess the applicant's eligibility to be admitted onto the Common Housing Register, to determine the level of priority that may be awarded to the application and other associated matters.

The Common Housing Register allows applicants to apply for social housing with Caerphilly County Borough Council and other social housing landlords in the borough with a single application.

### **Legal basis for processing**

There is a public task requirement to process your information as detailed below:

To enable the Council, as a local housing authority, to exercise its authority vested in it by Part VI of the Housing Act 1996 and for the Council to perform its tasks, carried out in the public interest, to allocate housing accommodation in compliance with both Part VI of the Housing Act 1996 and the Council's allocation scheme made in accordance with Part VI of the Housing Act 1996.

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

1e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

Data Protection legislation provides extra protection for certain classes of information called 'special personal data' and 'criminal offence data'. If any information falls within the definition of these classes then an additional condition from Article 9 / Article 10 of the Regulations must be identified, as outlined below:

Data Protection Act 2018, Schedule 2, Section 6 (Both an Article 9 and Article 10 Condition)

- (1) This condition is met if the processing—
  - (a) is necessary for a purpose listed in sub-paragraph (2), and
  - (b) is necessary for reasons of substantial public interest.
- (2) Those purposes are—
  - (a) the exercise of a function conferred on a person by an enactment or rule of law;
  - (b) the exercise of a function of the Crown, a Minister of the Crown or a government department.

## **Who will have access to your information**

### **Identity of Data Controller and Data Protection Officer**

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones  
Corporate Information Governance Manager / Data Protection Officer

Email: [dataprotection@caerphilly.gov.uk](mailto:dataprotection@caerphilly.gov.uk)  
Tel: 01443 864322

Other Data Controllers such as other social housing providers that operate within the borough may also be responsible for your information, depending on the specific circumstances. Please contact the service area detailed at the top of this document for further information.

### **Details of main users of your information**

The main user of your information within Caerphilly County Borough Council will be Common Housing Register Assessment Team, whose contact details are located at the top of this document.

Based on the applicant's choices when completing the Common Housing Register application, information submitted will also be processed by other social housing providers that operate within the borough.

### **Details of any sharing of your information within Caerphilly County Borough Council**

In order to assess the application and to ensure the accuracy of the information submitted, Caerphilly County Borough Council's Common Housing Register Assessment Team and/or other social housing providers may request information from and pass information to other bodies, such as other departments within the Caerphilly County Borough Council. This may include sharing information with the Housing Benefits team in order to verify the details of children named on the application.

Any information on the Common Housing Register application that relates to private sector landlords, managing agents or privately rented properties may be shared with Caerphilly County Borough Council's Private Sector Housing service, for the following purposes:

- To investigate and if necessary take action against landlords and agents that are not registered, as required by the Housing (Wales) Act 2014. The Private Sector Housing service may share this information with Rent Smart Wales.
- To investigate and if necessary take action against landlords of properties that are in poor repair under various legislation.
- To investigate and if necessary take action against landlords of houses of multiple occupancy (HMO) that are unlicensed and/or do not meet required HMO standards under various legislation.

Caerphilly County Borough Council may share the information provided on the Common Housing Register application with its homelessness team or other local authority homelessness team to prevent or alleviate homelessness.

### **Details of any sharing of your information with other organisations**

In order to assess the application and to ensure the accuracy of the information submitted, Caerphilly County Borough Council's Housing Allocations and Advice team and/or other social housing providers may request information from and pass information to other bodies, such as but not limited to: housing associations; the police and other emergency services; the probation and prison services; local health professionals and GP's; Social security agencies; the Benefits Agency; the Driver & Vehicle Licensing Agency; former landlord(s); the applicant's solicitor(s); the applicant's mortgage provider; utility providers; the Land Registry; the Welsh Government; voluntary sector support agencies and contractors. Outside of England and Wales the equivalent agency may be contacted.

Caerphilly County Borough Council has a legal responsibility to protect public funds. We may use the information submitted to prevent and detect fraud and may also request information from and pass information to other organisations that handle public funds.

### **Requests for information**

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Data Protection Act 1998.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

## **How long will we retain your information**

### **Details of retention period**

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

The information we hold on the Common Housing Register application including any associated documents, will generally be kept for 7 years. However, the information will be kept longer if your housing application is still active or the applicants support case remains open.

## **Automated decision making / profiling**

Information submitted to Caerphilly County Borough Council will be used in order to assess an applicant's eligibility to be admitted onto the Common Housing Register, to determine the level of priority that may be awarded to the application and other associated matters. This process contains elements of automatic decision making.

This means that the Common Housing Register software will allocate a housing needs category, depending on the applicant's answers to the questions/information provided. A trained Assessment Officer will review all information submitted / outcome to ensure that categories awarded are appropriate.

Those applicants assessed as having the greatest need will normally be afforded the highest priority in relation to suitable social housing that becomes available.

Further information on the Common Allocation Policy for Caerphilly County Borough can be obtained from our website:

[www.caerphilly.gov.uk/My-Council/Strategies,-plans-and-policies/Housing/Common-Allocation-Policy](http://www.caerphilly.gov.uk/My-Council/Strategies,-plans-and-policies/Housing/Common-Allocation-Policy)

## Your Rights (Inc Complaints Procedure)

### Your rights under the Data Protection Act 1998

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: [www.ico.org.uk](http://www.ico.org.uk)

To enact your rights please contact the service area detailed on the top of this form.

### Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council is handling your data, you have the right of complaint. Please contact the service area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process:

[www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints](http://www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints)

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# Summary Privacy Notice

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## How we will use your information

Information submitted to Caerphilly County Borough Council will be processed by the Common Housing Register Assessment Team and other social housing providers that operate within the borough. Information submitted will be used in order to assess the applicant's eligibility to be admitted onto the Common Housing Register, to determine the level of priority that may be awarded to the application and other associated matters. This process contains an element of automated decision making.

In order to assess the application and to ensure / verify the accuracy of the information submitted, Caerphilly County Borough Council's Common Housing Register Assessment Team and/or other social housing providers may request information from and pass information to other bodies. We may also use the information submitted to prevent and detect fraud and may also request information from and pass information to other organisations that handle public funds.

Information submitted on a Common Housing Register application form that relates to private sector landlords, managing agents or privately rented properties may be shared with Caerphilly County Borough Council's Private Sector Housing service.

Caerphilly County Borough Council may share the information provided on the Common Housing Register application with its homelessness team or other local authority homelessness team to prevent or alleviate homelessness.

The information we hold regarding a Common Housing Register application, including any associated documents, will generally be kept for 7 years but this may be longer in certain circumstances.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

Further information on how we process your information and your rights please follow this link:

[{Hyperlink to Full Privacy Notice on our website}](#)