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Service Area:	Service Improvement and Partnerships Unit
Work Area:	Policy and Partnerships
Contact Details:	01443 811365 ukrainesupport@caerphilly.gov.uk
Privacy Notice Name:	Homes for Ukraine Privacy Notice
Description of Privacy Notice:	This Privacy Notice will explain how Caerphilly County Borough Council will use the personal data of it receives under the Homes for Ukraine Scheme.

How we will use your information

Source and type of information being processed

Categories of personal data obtained

Caerphilly County Borough Council has obtained the following categories of personal data:

Ukrainian People

- Name
- Address
- Contact details including telephone number, email address,
- Date of birth
- Visa / Passport Information
- Family members information, including any children
- Disability and health information
- Ethnicity
- Information relating to any safeguarding concerns
- The name of a school any children will be attending
- Religion

Sponsor Family

- Name
- Address
- Details of family members that live at the property, to include ages
- Contact details including; telephone number, email address
- Information relating to any safeguarding, security checks and home assessments required for your suitability to provide support
- Bank details to process the monthly thank you payment.
- This information is required in order to ensure that provision is put in place and people are supported appropriately

Source of the personal data

- As part of the Homes for Ukraine scheme, Caerphilly County Borough Council (as host Local Authority), receives information from the Home Office and Welsh Government on each person being welcomed into the borough. We may also receive information directly from them.
- In respect of Sponsors, we will receive their information from their application form and any additional information we capture directly from them.

Purpose and legal basis for using your information

Purpose of processing

We are committed to take Ukrainian people through the UK Government's Homes for Ukraine scheme. This scheme will support Ukrainian people with Housing, Education, Health and integration into the community, as well as supporting the people who volunteer to sponsor Ukrainian people and their families.

It must be noted that during this time Councils have to quickly change the way in which they are working to continue to provide you with the support and services you need. We will always follow advice and guidance from the Welsh Government and UK Government when making any changes to the way in which we provide you with the support you need.

As part of this process:

- We will undertake an assessment to establish what support we can put in place for the Ukrainian people; as well as assessing the Sponsor household.
- To provide you the support needed your information may be shared with council departments and other agencies.
- We will keep a record of the support that we will be providing and may undertake regular reviews to establish whether the programme is working, or whether we need to change anything to help. This will include developing post arrival support plans involving organisations such as health and support services.

Legal basis for processing

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:

Article 6 (1)(c) - Legal obligation - to comply with our legal obligations in relation to providing housing, education, benefit support etc.

Article 6(1)(e) -to perform a task in the public interest or for our official functions - to provide the appropriate level of support for the Ukrainian people relocated into borough and the Sponsor family.

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

Necessary for reasons of substantial public interest - Art 9(2)(g). The UK GDPR Art 9(2)(g) requires a basis in UK law, which is provided by Section 10(3) of the Data Protection Act 2018.

This in turn refers to the need to meet a relevant condition in Part 2 of Schedule 1 of the DPA 2018. Paragraph 6(1)(b) of Part 2 of Schedule 1 – processing is necessary for reasons of

substantial public interest, in the exercise of a function conferred by an enactment or rule of law.

Data Protection legislation also provides extra protection for personal data in relation to criminal convictions and offences. If any personal data falls within this category, then an additional condition from Article 10 of the Regulations must be identified, as outlined below:

Article 10 - Personal Data about criminal convictions, offences or related security measures. Meets a relevant condition in Part 1, 2 or 3 of Schedule 1 of the Data Protection Act 2018. The relevant conditions are:

Paragraph 2(2)(e) – processing is necessary for social care purposes

Paragraph 6(2)(a) – processing is necessary for the exercise of a function conferred by an enactment or rule of law

Paragraph 10(1) – processing is necessary for the purposes of the prevention or detection of an unlawful act.

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:

Mr Carl Evans

Corporate Information Governance Manager / Data Protection Officer

Email: dataprotection@caerphilly.gov.uk

Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

Details of main users of your information

The main user of your data will be Caerphilly County Borough council. However as part of the process your information may be shared with other organisations.

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

Depending on the support required, your information may be shared with other Council services, which may include:

- Education
- Financial Services
- Social Services
- Employment Services
- Human Resources
- Housing/Homelessness

Details of any sharing of your information with other organisations

We may also share your information with the following organisations:

- Support Service Provider (Welsh Refugee Council)
- Wales Strategic Migration Partnership (WSMP)
- Government Agencies (UK and Welsh Government)
- Aneurin Bevan University Health Board (Health Services)
- Gwent Police

- Schools within the borough
- Department for Work and Pensions
- Registered Social Landlords
- Other Local Authorities
- Local Voluntary Organisations and faith groups

If it is believed that a child or vulnerable adult may be at risk, we have a legal duty to investigate and the Wales Safeguarding Procedures will be followed, which may result in a formal investigation and assessment. This may involve several agencies such as the police, health and education. Also, if you are a professional / volunteer subject to allegations of abuse / neglect this may also involve your employer.

Details of any external data processors

Digital Health and Care Wales (DHCW), as data processors on behalf of the Welsh Government, for the secure transfer and sharing of your personal data between ourselves, Welsh Government and Health Boards in Wales.

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 Data Protection legislation.

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

The Council will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. At the end of the retention period the Council will securely destroy or dispose of the data in line with retention schedules.

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection

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.

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 has handled your request / information, 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

Summary Privacy Notice

How we will use your information

Under the Homes for Ukraine scheme, your information may be processed by Caerphilly County Borough Council in order to support Ukrainian people with; Housing, Education, Health and integration into the community, as well as supporting the people who volunteer to sponsor Ukrainian people and their families.

As part of this process, we will undertake an assessment to establish what support we can put in place for the Ukrainian people; as well as assessing the Sponsor household. To provide the support needed your information may be shared with council departments and other agencies. We will keep a record of the support that we will be providing and may undertake regular reviews to establish whether the programme is working, or whether we need to change anything to help. This will include developing post arrival support plans involving organisations such as health and support services.

The lawful basis for processing your information will be Article 6 (1)(c) - Legal obligation - to comply with our legal obligations in relation to providing housing, education, benefit support etc. and Article 6(1)(e) -to perform a task in the public interest or for our official functions - to provide the appropriate level of support. The Council will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. At the end of the retention period the Council will securely destroy or dispose of the data in line with retention schedules.

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.

For further information on how we process your information and your rights please click the following link:

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