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Service Area:	Caerphilly Cares
Work Area:	Cost of Living
Contact Details:	01443 811490 caerphillycares@caerphilly.gov.uk
Privacy Notice Name:	Cost of Living Hardship Fund
Description of Privacy Notice:	This privacy notice will explain how Caerphilly County Borough Council will use the information provided if you are referred for the Cost of Living Hardship fund.

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 your personal data:

- Name and Contact Details
- Date of Birth
- National Insurance Number
- Address Details and Property Type
- Employment Status and Details of any Benefits Claimed – for main applicant and any others living in the Household
- Details of other Financial Support Accessed
- Reasons for hardship resulting in application to fund
- 2 most recent bank statements
- Summary of income and expenditure

Source of the personal data

This information has been shared with Caerphilly County Borough Council by another organisation as detailed below:

If you would like further information on the source of this information please contact Caerphilly County Borough Council. You may be required to apply for this information as a Subject Access Request.

- Citizens Advice Service
- Plattform
- Pobl
- Holistic Hoarding

- Mencap Vulnerable Persons
- Mind
- Sight Cymru
- St Vincents
- Age Cymru
- Ty Fesen project/Floating Support (internal)
- CCBC Floating Support (internal)
- Cornerstone
- Homestart
- Llamau
- Valley Support Services
- Gwent Drug & Alcohol Service (GDAS)
- Aneurin Bevan Specialist Drug and Alcohol Service (ABDAS)
- Shelter
- Gypsies and Travellers Wales

Purpose and legal basis for using your information

Purpose of processing

Primary: To enable processing (including assessing eligibility) of Hardship Fund application and payment of any awards given.

Secondary: To enable CCBC as grant administrators/funders to gather demographic information on applicants to enable us to analyse which groups are most in need of additional financial hardship support.

Contact information may also be used by our teams to allow them to make contact in respect to offering additional support (if not already being provided by referring agency), in line with conditions of grant.

Legal basis for processing

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

Well-being of Future Generations (Wales) Act 2015
The Social Services and Well-being (Wales) Act 2014

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)(e) '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 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:

Article 9(2)(g) 'processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect

the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

In addition, as we are relying on the substantial public interest condition in Article 9(2)(g), we must identify a valid substantial public interest condition set out in Part 2 of Schedule 1 of the Data Protection Act 2018. This is outlined below:

6(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.'

6(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:

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

CCBC Housing (Rents)
CCBC Caerphilly Cares

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

Your information may be shared with CCBC Digital Services in the case of any issues with online application portal or payments due.

Your information may be shared with Legal in the case of any payments which may need to be recovered due to duplicate claims or fraud.

Internal Audit.

Details of any sharing of your information with other organisations

Information may be shared with the HM Court & Tribunal Service in order to exercise our legal obligations to recover unpaid amounts due to the council.

Your information may be shared with external auditors for the purposes of complying with the accounts and audit regulations in the annual audit of the council's annual financial accounts.

Details of any external data processors

Your information may be shared with and processed by Charis, an online shop/portal, in the case of white goods being ordered, for purposes of delivery and installation of white goods. In the case of financial payment via payment voucher, your information may also be shared with Charis for the purpose of issuing a payment voucher.

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

Details of retention period

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

Current year of account plus 6 years.

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

We are using your information to enable processing of your Hardship Fund application, gather demographic data and to potentially offer additional support in line with the conditions of the grant. Your information may be shared with CCBC Digital Services, CCBC Legal, CCBC Internal Audit, HM Court & Tribunal Service, External auditors and Charis. We will hold your information for a term of six years plus current year. We are relying on the *public task* legal basis to process your information.

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}](#)