



Comhairle Contae  
Ros Comáin  
Roscommon  
County Council



# COMHAIRLE CONTAE ROS COMÁIN ROSCOMMON COUNTY COUNCIL

## Privacy Statement Housing Department

October 2018

## Version Control

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## 1.0 Introduction

The role of the Housing Department is to manage the provision of social housing within the County. It achieves this by providing the following services/functions:

- Provision of emergency accommodation
- Processing social housing applications
- Allocation of Local Authority housing and tenancy agreements (including Garda Vetting)
- Provision of social housing via Housing Associations (CALF/CAS) and the leasing of private properties (HAP, RAS and Roscommon County Council/Housing leasing agreements)
- Administration of grant funding (HOP, HGD, HGD-LA, IWILs and energy)
- Administration of housing loans (Rebuilding Ireland Housing Loan), Shared Ownership Scheme and Tenant Purchase Schemes
- Maintaining social housing stock
- Providing new stock and disposal of old stock, as appropriate
- Inspection of rented property (RTB)
- Tenant and estate management (including rent collection)

## 2.0 Purpose of Privacy Statement

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the Housing Department may collect about individuals, why it is needed, how it is used and how individuals may interact with the Housing Department in relation to their personal data. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

## 3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- **Data Subject:** is an individual who is the subject of personal data.
- **Personal Data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or

indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Special Categories of Personal Data:** is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.

#### **4.0 Scope**

This statement applies to all personal data processed by the Housing Department in physical or electronic format. This data primarily relates to applicants and tenants availing of social housing services.

#### **5.0 Data Protection Policy**

The Housing Department processes a significant amount of personal data in various formats on an on-going basis. Roscommon County Council is committed to ensuring that personal data processed by its Housing Department is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes only;
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained;
- Recorded, stored accurately and securely and where necessary kept up to date;
- Kept only for as long as is necessary for the purposes for which it was obtained;
- Kept in a form which permits identification of the data subject;
- Processed in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Roscommon County Council has a Corporate Data Protection Policy which goes in to more detail as to how it intends meeting these commitments. A copy of this document can be accessed [here](#).

## 6.0 What Personal Data is Processed

Details of personal data processed by each of the services/functions of the Housing Department are contained in the following tables:

<b>Table 6.1</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Provision of Emergency Accommodation	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal Address (last permanent address)</li> <li>• Eircode</li> <li>• Contact Details (phone numbers, e-mail address)</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Nationality</li> <li>• Civil Status</li> <li>• PPS Number</li> <li>• Income/Employment Details</li> <li>• Passport/Drivers Licence/National Identity Card/Public Service Card</li> <li>• Separation Agreement</li> <li>• Divorce Agreement</li> <li>• Barring Order</li> <li>• Garda Report</li> <li>• Income Details</li> <li>• Next of Kin Details including Name and Contact Number</li> <li>• Landlord's Name and Contact Details</li> <li>• Household Names and all the above details for each Household Member</li> <li>• Tusla/Social Worker Contact Details</li> <li>• Addiction/Support Details</li> <li>• Physical and Mental Health Needs</li> <li>• Name of G.P.</li> <li>• Service Support Plan</li> <li>• Criminal Offences</li> </ul>

**Table 6.2**

<b>Service/Function</b>	<b>Personal Data Processed</b>
Processing Social Housing Applications	<ul style="list-style-type: none"><li>• Name</li><li>• Postal Address</li><li>• Eircode</li><li>• Contact Details (phone numbers, e-mail address)</li><li>• Date of Birth</li><li>• Gender</li><li>• Nationality</li><li>• Civil Status</li><li>• PPS Number</li><li>• Passport /Drivers Licence/Social Services Card/Identity Card</li><li>• Electricity / Telephone Identification</li><li>• Other Utility Bill</li><li>• Income/Employment Details</li><li>• Bank Account Details</li><li>• Separation Agreement</li><li>• Divorce Agreement</li><li>• Bank Re-possession Details</li><li>• Information in relation to Sale of Land/Assets+ Folio No's.</li><li>• Income Details</li><li>• Medical Report (including Consultant's &amp; Occupational Report)</li><li>• Landlord's Name &amp; Contact Details</li><li>• Accommodation History</li><li>• Previous Local Authority Tenancies</li><li>• Details of any Property or Land Previously Owned Ownership</li><li>• Household Names and all of above details for each Household Member</li></ul>

<b>Table 6.3</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Allocation of Local Authority Housing and Tenancy Agreements (including Garda vetting)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal Address</li> <li>• Eircode</li> <li>• Contact Details (phone numbers, e-mail address)</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Nationality</li> <li>• Civil Status</li> <li>• PPS Number</li> <li>• Bank Account Details</li> <li>• Income Details</li> <li>• Garda Vetting</li> <li>• Household Names and all of above details for each Household Member</li> </ul>

<b>Table 6.4</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Provision of Social Housing via Housing Associations (CALF/CAS) and Private Rented Accommodation (RAS, HAP and leasing)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal Address</li> <li>• Eircode</li> <li>• Contact Details ( phone numbers, e-mail address)</li> <li>• PPS Number</li> <li>• Tax Clearance Certificate</li> <li>• Bank Account Details</li> <li>• Note that tenants allocated to these properties – personal data processed is processed under table 6.3 – Allocations and tenancy agreements ( including Garda Vetting)</li> </ul>



**Table 6.5**

<b>Service/Function</b>	<b>Personal Data Processed</b>
Administration of Grant Funding (HOP, HGD, HGD-LA, IWILs and energy)	<ul style="list-style-type: none"><li>• Name</li><li>• Postal Address</li><li>• Eircode</li><li>• Contact Details ( phone numbers, e-mail address)</li><li>• Date of Birth</li><li>• Gender</li><li>• Civil Status</li><li>• PPS Number</li><li>• Tax Clearance Certificate</li><li>• Bank Account Details</li><li>• Certificate of Interest on Savings/Dividend Accounts</li><li>• Income details</li><li>• Folio Numbers</li><li>• Medical Report ( including Consultant's &amp; Occupational Therapist's Report)</li><li>• Grant Applicant's Household Names, Dates of Birth, Gender, PPS Number</li><li>• Contractor's Name, Address &amp; Contact Details</li><li>• Contractor's Tax Clearance Certificate</li></ul>

<b>Table 6.6</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Administration of Housing Loans, Shared Ownership and Tenant Purchase Scheme	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal Address</li> <li>• Eircode</li> <li>• Contact Details ( phone numbers, e-mail address)</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Civil Status</li> <li>• PPS Number</li> <li>• Tax Clearance Certificate</li> <li>• Bank Account Details</li> <li>• Income Details</li> <li>• Folio Number</li> <li>• Tenant Purchaser's Household Names, Dates of Birth, Gender, PPS Number</li> <li>• House Loan &amp; Tenant Purchaser's Legal Agent's Name</li> </ul>

<b>Table 6.7</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Maintenance of Housing Stock	<ul style="list-style-type: none"> <li>• Name of Appointed Tenant</li> <li>• Postal Address of Household</li> <li>• Eircode</li> <li>• Contact Details (phone numbers, e-mail address)</li> <li>• Roscommon County Council's Contractor's Name, Address, Tax Clearance Certificate and Bank Details</li> </ul>

<b>Table 6.8</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Provision of New Stock and Disposal of Old Stock	<ul style="list-style-type: none"> <li>• Name of Vendor</li> <li>• Postal Address of Vendor</li> <li>• Eircode</li> <li>• Contact Details of Vendor (phone numbers, e-mail address)</li> <li>• Folio Number</li> <li>• Local Property Tax Details</li> <li>• NPPR Property ID &amp; Account Reference</li> <li>• Irish Water Certificate of Discharge</li> <li>• Vendors Legal Agent's Name and Address, Phone Number and Email Address</li> <li>• Vendor's Legal Agents Bank Account Details</li> <li>• Name of Purchaser</li> <li>• Postal Address of Purchaser</li> <li>• Eircode</li> <li>• Contact Details of Purchaser (phone numbers, e-mail address)</li> <li>• Purchaser's Legal Agent's Name and Address, Phone Number and Email Address</li> <li>• Purchaser's Legal Agents Bank Account Details</li> </ul>

<b>Table 6.9</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Inspection of Rented Property (RTB)	<ul style="list-style-type: none"> <li>• Name of Tenant</li> <li>• Postal Address of Rented Property</li> <li>• Eircode of Rented Property</li> <li>• Contact Details of Landlord ( phone numbers, e-mail address)</li> <li>• Contact Details of Tenant (phone numbers, e-mail address)</li> <li>• Breaches of Housing ( Standards for Rented Houses) 2017</li> </ul>

<b>Table 6.10</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Tenant and Estate Management (including Rent Collection)	<ul style="list-style-type: none"> <li>• Name of each Household Member</li> <li>• Postal Address of Household</li> <li>• Eircode</li> <li>• Contact Details (phone numbers, e-mail address)</li> <li>• Date of Birth of each Household Member</li> <li>• PPS Number of each Household Member</li> <li>• Bank Account Details of each Household Member (where applicable)</li> <li>• Income details of each Household Member</li> <li>• Anti-social Behaviour Complaints on Household</li> <li>• Tenancy Breaches by any Household Members</li> <li>• Rent Arrears</li> <li>• Tenancy Warning for any Household Member</li> </ul>

## **7.0 Why Personal Data is Processed**

Personal data is processed by the Housing Department in order to deliver the services outlined in Section 1.0.

If the Housing Department proposes to process personal data for a purpose other than it was obtained it will, prior to such processing, provide the data subject with information on that purpose and any other relevant information.

## **8.0 The Legal Basis for Processing Personal Data**

The legal basis for processing personal data by the Housing Department is mostly contained in the following legislation:

- Housing Act 1966
- Housing Act 1988
- Housing ( Miscellaneous Provisions ) Act 1979
- Housing ( Miscellaneous Provisions ) Act 1992

- Housing ( Miscellaneous Provisions ) Act 1997
- Housing ( Miscellaneous Provisions ) Act 2002
- Housing ( Miscellaneous Provisions ) Act 2009
- Housing ( Miscellaneous Provisions ) Act 2014
- Housing ( Traveller Accommodation ) Act 1998
- Residential Tenancies Act 2004
- Residential Tenancies ( Amendment ) Act 2009
- Residential Tenancies ( Amendment ) Act 2015
- Housing ( Standards for Rented Houses) 2017
- Social Housing Assessment Regulations 2011
- Housing ( Adaptations for Older People and People with a Disability) 2007
- Housing ( Adaptations for Older People and People with a Disability) 2014
- Housing ( Sale of Local Authority Houses ) Regulations 2015
- Housing ( Rebuilding Ireland Home Loans) Regulations 2018

There may be a limited number of circumstances whereby the Housing Department relies on consent for the processing of personal data. In such circumstances the data subject has the right to withdraw consent to the processing of his or her personal data at any time.

Where special categories of information are being processed the Housing Department will obtain the data subject's explicit consent to such processing unless this is not required by law or the personal data is required to protect the health of the data subject in an emergency.

## **9.0 How Personal Data is Obtained**

**9.1** Most of the personal data collected by the Housing Department is obtained directly from individuals availing of services provided by the Housing Department. However information is also obtained from other sources such as the Gardaí, Central Credit Register, Health Service Executive and other Local Authorities, as appropriate.

**9.2** The Housing Department also creates personal data as a result of processing activities carried out by the services it provides; such as:

- Applications for homeless accommodation
- Housing applications
- Tenant information
- Grant applications
- Loan , Shared Ownership & Tenant Purchase applications
- Maintenance records and condition surveys
- Property inspection reports

**10.0 How Personal Data is Processed**

The processing of personal data by staff within the Housing Department is generally carried out by use of:

- Hard copy office folders
- Electronic folders
- Data bases (iHouse, Ascendas, Grants, Agresso, CCAS,PASS)

**11.0 Sharing Personal Data with Third Parties**

The sharing of personal data with third parties will only occur in circumstances that are permitted by law.

Details of the sharing of personal data by the Housing Department with third parties are contained in the following tables:

<b>Table 11.1</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Provision of Emergency Accommodation	<ul style="list-style-type: none"> <li>• Service Providers</li> <li>• Galway County Council</li> <li>• Health Service Executive</li> </ul>

<b>Table 11.2</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Processing Social Housing Applications	<ul style="list-style-type: none"> <li>• Housing Associations</li> <li>• Social Welfare- Community Welfare Officers</li> <li>• Other Local Authorities</li> </ul>

<b>Table 11.3</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Allocation of Local Authority Housing and Tenancy Agreements (including Garda vetting)	<ul style="list-style-type: none"> <li>• Social Welfare</li> <li>• Other Local Authorities</li> <li>• Housing Associations</li> <li>• Garda Síochána</li> <li>• Health Service Executive</li> <li>• Tusla</li> </ul>

<b>Table 11.4</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Provision of Social Housing via Housing Associations (CALF/CAS) and Private Rented Accommodation (RAS, HAP and leasing)	<ul style="list-style-type: none"> <li>• Landlords, Potential Landlords</li> <li>• Other Local Authorities</li> <li>• Limerick County Council HAP Shared Service</li> <li>• Department of Housing, Planning, Community &amp; Local Government</li> <li>• Revenue Commissioners</li> <li>• Auditors</li> <li>• Central Statistics Office</li> </ul>

<b>Table 11.5</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Administration of Grant Funding (HOP, HGD, HGD-LA, IWILs and energy)	<ul style="list-style-type: none"> <li>• Occupational Therapist</li> <li>• Consultants</li> <li>• Contractors</li> <li>• Department of Housing, Planning, Community &amp; Local Government</li> <li>• Ombudsman</li> <li>• Housing Associations</li> <li>• Auditors</li> </ul>

<b>Table 11.6</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Administration of Housing Loans, Shared Ownership and Tenant Purchase Scheme	<ul style="list-style-type: none"> <li>• Other Local Authorities</li> <li>• Housing Agency</li> <li>• Central Credit Register</li> <li>• Legal Agent appointed by Roscommon County Council</li> <li>• Debt Collecting Agent for Roscommon County Council</li> <li>• Ombudsman</li> </ul>

<b>Table 11.7</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Maintenance of Housing Stock	<ul style="list-style-type: none"> <li>• Contractors</li> </ul>



<b>Table 11.8</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Provision of New Stock and Disposal of Old Stock	<ul style="list-style-type: none"> <li>• Roscommon County Council Appointed Legal Agent</li> <li>• Auditors</li> </ul>

<b>Table 11.9</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Inspection of Rented Property (RTB)	<ul style="list-style-type: none"> <li>• Relevant Landlord</li> <li>• Relevant Tenant</li> </ul>

<b>Table 11.10</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Tenant and Estate Management (including Rent Collection)	<ul style="list-style-type: none"> <li>• Other Local Authorities</li> <li>• Debt Collecting Legal Agent for Roscommon County Council</li> <li>• RAS &amp; HAP Landlords</li> <li>• Tusla</li> <li>• Health Service Executive</li> <li>• Limerick County Council HAP Shared Service</li> <li>• Auditors</li> </ul>

## **12.0 Records Retention Policy**

The Housing Department's practices in relation to the retention of personal data are guided by the Local Government Management Agency's (LGMA) National Retention Policy for Local Authority Records and any updates that are issued by the LGMA. Copies of these documents are available [here](#).

### **13.0 Data Subject Rights**

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure (also known as the 'right to be forgotten') of personal data;
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

Roscommon County Council has developed a Data Subject Rights Policy and Procedures document which provides more detailed information on the rights of a data subject and how to exercise them. A copy of this document is available [here](#).

### **14.0 Complaints to the Data Protection Commission**

**14.1** Data subjects may make a complaint in the following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a data subject right request;
- b) If they are dissatisfied with a decision by Roscommon County Council on their data subject right request;
- c) If they consider that Roscommon County Council's processing of their personal data is contrary to data protection legislation.

**14.2** Contact details for the Data Protection Commission are as follows:

Phone Number: 0761 104 800 or Local 1890 252 231  
E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Website: [www.dataprotection.ie](http://www.dataprotection.ie)  
Postal Address: Data Protection Commission  
Canal House  
Station Road  
Portarlinton  
Co. Laois  
R32 AP23

**15.0 Monitoring and Review**

Provisions contained in this statement shall be subject to on-going monitoring and review.

**16.0 Further Information**

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Roscommon County Council. Contact details for the County Council's Data Protection Officer are as follows:

Phone Number: 090 6637100  
E-mail: [dataprotection@roscommoncoco.ie](mailto:dataprotection@roscommoncoco.ie)  
Website: [www.roscommoncoco.ie](http://www.roscommoncoco.ie)  
Postal Address: Roscommon County Council  
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