



Comhairle Contae  
Ros Comáin  
Roscommon  
County Council



# **COMHAIRLE CONTAE ROS COMÁIN**

## **ROSCOMMON COUNTY COUNCIL**

### **Privacy Statement**

### **Water Services Department**

**October 2018**

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## **1.0 Introduction**

The role of the Water Services Department is to provide services to Irish Water under a Service Level Agreement and administer exchequer funds to improve Group Water Scheme and Group Sewerage Scheme infrastructure so schemes can provide a water supply that meets water quality requirements. It achieves this through providing the following services/functions:

- Management, engineering and administration support to meet the obligations of the Service Level Agreement and Work Programmes of Irish Water.
- Provide guidance to and administer exchequer funds and subsidies to improve group water scheme and group sewerage scheme infrastructure in order that schemes can provide a water supply that meets water quality requirements.
- Monitor water supplies and investigate and consult with the Health Service Executive when water quality standards are breached.
- Individual Well Grant and Lead Remediation Grant
- Payments to suppliers

## **2.0 Purpose of Privacy Statement**

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the Water Services Department may collect about individuals, why it is needed, how it is used and how individuals may interact with the Water Services 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 Water Services Department in physical or electronic format. This data primarily relates to customers receiving public water/wastewater supplies, private water/wastewater supplies, semi private water/wastewater supplies, grant aid and data relating to Water Services staff in the County Council.

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

The Water Services 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 Water Services 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 Water Services Department are contained in the following tables:

<b>Table 6.1</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Management, engineering and administration support to meet the obligations of the Service Level Agreement with and Work Programmes of Irish Water.	<ul style="list-style-type: none"> <li>• Water Services Staff               <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Personnel number</li> <li>○ Grade</li> <li>○ Work location details</li> <li>○ Work pattern</li> <li>○ Pensionable status</li> <li>○ Retirement date</li> <li>○ Salaries/wages data</li> <li>○ Allowances data</li> <li>○ Tax deductions data</li> <li>○ Pension related deductions data</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Suppliers <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Address</li> <li>○ PPS/VAT Number</li> <li>○ Contact details (Email address, telephone number)</li> <li>○ Prices on goods &amp; services</li> <li>○ Eircode/Postcode</li> </ul> </li>   <li>• Land Registry Data.</li> </ul>
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<b>Table 6.2</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Provide guidance to and administer exchequer funds and subsidies to improve group water scheme and group sewerage scheme infrastructure in order that schemes can provide a water supply that meets water quality requirements.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Eircode/Postcode</li> <li>• PPS/VAT number</li> <li>• Contact details (Email address, telephone number)</li> <li>• Bank details</li> <li>• Prices for goods and services</li> <li>• Agent name</li> <li>• Agent address</li> <li>• Agent contact details (Email address, telephone number)</li> <li>• Accountant name</li> <li>• Accountant address</li> <li>• Accountant contact details (Email address, telephone number)</li> </ul>

<b>Table 6.3</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Monitor water supplies and investigate and consult with the Health Service Executive when water quality standards are breached.	<ul style="list-style-type: none"> <li>• Name of Public, Semi Private Scheme or Group Scheme Organiser</li> <li>• Address of Scheme/ Group Scheme Organiser</li> <li>• Eircode/Postcode</li> <li>• Contact details (Email address, Telephone number)</li> </ul>

<b>Table 6.4</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Individual Well Grant and Lead Remediation Grant	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Eircode/Postcode</li> <li>• PPS number</li> <li>• Contact details (Email address, Telephone number)</li> <li>• Bank details</li> <li>• Revenue/Tax Clearance detail</li> </ul>

<b>Table 6.5</b>	
<b>Service/Function</b>	<b>Personal Data Processed</b>
Payments to Suppliers	<ul style="list-style-type: none"> <li>• Name</li> <li>• Postal address</li> <li>• Contact details (phone numbers, e-mail address)</li> <li>• Bank details</li> <li>• Category of supplier</li> <li>• VAT/TRN/PPS number</li> <li>• Tax clearance details</li> <li>• Payment details.</li> </ul>

## **7.0 Why Personal Data is processed**

Personal data is processed by the Water Services Department in order to:

- Meet the County Council's obligations under the Service Level Agreement with Irish Water.
- Process applications for funding to improve the drinking water quality in private drinking water supplies.
- Monitor water and wastewater standards in accordance with legislation.

If the Water Services 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 Water Services Department is mostly contained in the following legislation:

- European Communities Act 1972
- Local Government Act 2001
- Water Services Act 2007
- Water Services Act 2013
- EPA Acts
- Safety Health and Welfare at Work Act 2005

There may be a limited number of circumstances whereby the Water Services 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 Water Services 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 Water Services Department is obtained directly from Roscommon County Council's financial system, Irish Water financial systems and customer applications for funding.

**9.2** The Water Services Department also creates personal data as a result of processing activities carried out by the services it provides e.g. Grant applications.

#### **10.0 How Personal Data is processed:**

The processing of personal data by staff within the Water Services Department is generally carried out by its IT systems. Details of the IT systems that are used by the Water Services to process personal data are as follows:

- Agresso
- Oracle
- Excel application sheets

#### **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 Water Services 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>
Management, engineering and administration support to meet the obligations of the Service Level Agreement and Work Programmes of Irish Water	<ul style="list-style-type: none"> <li>• Irish Water</li> <li>• Legal Agents</li> <li>• PRAI</li> </ul>

<b>Table 11.2</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Provide guidance to and administer exchequer funds and subsidies to improve group water scheme and group sewerage scheme infrastructure in order that schemes can provide a water supply that meets water quality requirements.	<ul style="list-style-type: none"> <li>• Irish Water</li> <li>• Department of Housing, Planning and Local Government</li> <li>• Federation of Group Water Schemes</li> </ul>

<b>Table 11.3</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Monitor water supplies and investigate and consult with the Health Service Executive when water quality standards are breached	<ul style="list-style-type: none"> <li>• Health Service Executive.</li> <li>• Environmental Protection Agency</li> <li>• Irish Water</li> </ul>

<b>Table 11.4</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Individual Well Grant and Lead Remediation Grant	<ul style="list-style-type: none"> <li>• Department of Housing, Planning and Local Government</li> </ul>

<b>Table 11.5</b>	
<b>Service/Function</b>	<b>Third Parties with whom Personal Data is Shared</b>
Payment to Suppliers	<ul style="list-style-type: none"> <li>• Irish Water</li> <li>• Department of Housing, Planning and Local Government</li> </ul>

## **12.0 Records Retention Policy**

The Water Services 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  
Áras an Chontae  
Roscommon  
F42 VR98.