



Customer Engagement - Privacy Notice

This privacy notice is for the use of service users/customers of Walsall Metropolitan Borough Council's Customer Engagement service in fulfilment of our responsibility as a data controller under data protection law.

The Customer Engagement service provides:

- Financial help to pay your rent and council tax (housing benefit and council tax reduction);
- Provide guidance and support for people that become homeless or are worried about becoming homeless;
- Administering the councils Housing Register and delivery the of council's Housing Allocations Policy
- Resettlement services for refugees and
- The Welfare Rights service provides support and advice:
 - To help you claim benefits that are relevant to your circumstances;
 - To promote appropriate quality of life improvements (for example fire safety checks and blue badges);
 - To help you manage any financial debts that you might have;
- The Housing Standards and Improvement team carries out the following functions:
 - Improving Housing standards in the private rented sector through advice and enforcement;
 - Licensing of Houses in Multiple Occupation (HMOs) and mobile home sites;
 - Grant aid to adapt and improve residents' homes through Disabled Facilities Grants;
 - Delivery of Affordable Warmth Initiatives
- Access to free school meals and educational funding for children (early years pupil premium);
- The collection of council tax and business rates;

You are entitled to know what personal data we use, why we use it, how we store it and for how long, and who we might share it with and why. Personal data is any information which provides details about an individual to someone else. The individual must be identifiable from the information, if the information is fully anonymised it is no longer classed as personal information.

Information we collect and use

Information we collect and use	Benefits	Revenues	Housing/ Homelessness/ Resettlement	Free School Meals
Address	✓	✓	✓	✓
Bank Account details - balance of account	✓		✓	
Bank Account details - name of account holder	✓	✓	✓	
Biometric data – if supplied by DWP	✓		✓	
Contact details	✓	✓	✓	



Credit check information		✓	✓	
Date of Birth	✓		✓	✓
Details of any DWP benefits that you receive	✓		✓	
Details of any outstanding debts that you might have	✓		✓	
Details of any property or land (other than the address that you are claiming for) that you own	✓		✓	
Details of any rooms you rent out	✓		✓	
Details of criminal investigation or convictions	✓		✓	
Details of whether you are a student or on any training course	✓		✓	
Details of your income (e.g. wages, pension details, etc)	✓	✓	✓	
Details of your outgoings and expenditure (e.g. child care costs, pension details, etc)	✓		✓	
Employers Information	✓	✓	✓	
Ethnicity			✓	
Gender		✓	✓	✓
Health (physical/mental) information	✓		✓	
Information on any non-dependents within the household that live with you including but not limited to name, dob & income details	✓		✓	
Mental capacity information	✓	✓	✓	
Name	✓	✓	✓	✓
National Asylum Support Service (NASS) number			✓	✓
National Insurance Number	✓		✓	✓
Next of kin, name and contact details	✓		✓	
NHS Number and internal reference numbers			✓	
Referral/Assessment information	✓		✓	
Relationships information	✓	✓	✓	✓
Relevant case notes	✓	✓	✓	
Religion			✓	
Rent Details – including rent charges and landlord details	✓		✓	
Rent Officer Referral / Decisions	✓		✓	
Risks and vulnerabilities (please see below)	✓		✓	
School / academy /nursery school / private setting			✓	✓

Department for Work and Pensions – DWP

- DWP supply data to the LA to enable us to process various benefit applications and other welfare provisions.
- The supply of data by DWP to LA's within their Memorandum of Understanding is permitted by specific provisions of primary and secondary legislation.

Risks and Vulnerabilities:

- Risk assessments may be shared with agencies and / or children's services for placement of young persons. Alerts may be placed and removed on systems.
- We may record the potential risk of violence
- We may record concerns about any health issues or addictions that you may suffer from



Purpose for processing and lawful basis

The lawful basis under which we process your information and the linked reason for processing is:

- When processing your information is necessary to cooperate with and conform to UK law or another legal obligation to which the Council is subject.
- The purpose of processing is to carry out a task in the public interest or the exercise of official authority vested in the controller.
- If you give us your fully expressed consent to process your information for a specific purpose for which we asked your permission.

Special Category Data

Special category data is information which is deemed particularly sensitive and which unlawful processing could create risks to you. In order to offer the services provided by Customer Engagement, we need to collect and use the special category data detailed at the start of this form and we are relying on the following lawful basis for this processing:

- Necessary for carrying out our obligations with regard to social security and social protection law.

What we do with your information

We use your information to progress requests to access our services, or to administer our function as a local authority. Your information may be manually and/or digitally processed through our systems by people in the UK. These may be internal council staff or external staff via public and private healthcare providers, other public authorities, contractors and other agencies (insert specific third party/agency name). All people with access to your information will do so under strict adherence to Data Protection law, adequate safeguards and appropriate authorisation.

We may also use the data (including data supplied by DWP) in a testing or development environment. We only use 'live' data when there is no other alternative and we ensure that the data remains fully protected and secure at all times and it is only ever used in compliance with the UK GDPR principles.

Who we may share your information with

In order to (insert details of service or public function being carried out) we may need to share your information with the following entities:

Organisations we may share your information with	Benefits	Revenues	Housing	Free School Meals
Audit Services	✓	✓	✓	✓
Care agencies	✓			
Charities Age UK, Addaction, Walsave, Glebe Centre, One Walsall, Ablewell Money Advice Services, Walsall Money Advice, Walsall Deaf Community Services & YMCA	✓		✓	



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Children & Adult Social Care departments	✓		✓	
Citizens Advice Bureau	✓		✓	
Client Welfare Services , Walsall Council	✓		✓	
Community Based Care Services, Walsall Council	✓		✓	
Credit reference agencies		✓	✓	
Data team, Walsall Council				✓
Department for Work and Pensions	✓	✓	✓	✓
Early Years team, Walsall Council				✓
Education Admissions, Walsall Council			✓	✓
Education providers Walsall MBC maintained schools/nurseries and individual Academies	✓		✓	✓
Education transport, Walsall Council				✓
Electoral Services, Walsall Council		✓		
Employment and skills team, Walsall Council				✓
Enforcement agencies		✓	✓	
Finance, Walsall Council			✓	✓
Health agencies, including NHS, Dudley and Walsall Mental Health Trust	✓	✓	✓	
HM Courts and Tribunal Service	✓		✓	
HM Revenue and Customs (HMRC)	✓	✓	✓	✓
Home Office	✓		✓	✓
Housing Associations (including but not limited to):				
<ul style="list-style-type: none"> • Anchor Housing Association • Black Country Housing Association • Bromford Housing Association • Clarion Housing Association • Citizen Housing Association • GreensquareAccord Housing Association • Housing 21 Housing Association • Longhurst Housing Association • Midland Heart Housing Association • Nehemiah Housing Association • Platform Housing Association • Stonewater Housing Association • Watmos Housing Association • WHG Housing Association 	✓		✓	
Housing Providers	✓		✓	
Legal Services, Walsall Council	✓		✓	
Other – Borch (white goods) Furniture Resource Centre , Movecorp			✓	
Other - Housing Staff, Walsall Council	✓		✓	✓
Other council services, as appropriate	✓	✓	✓	✓
Other Local Authorities	✓		✓	✓
Police	✓	✓	✓	
Relevant Advice services		✓	✓	
Tracing Services		✓	✓	
Troubled Families, Walsall Council	✓		✓	
Valuation Office Agency	✓	✓	✓	



Valuation Tribunal Service		✓	✓	
West Midlands Fire & Rescue Service			✓	

There may also be occasion when we will share your information with relevant third parties when required to do so by law.

How long we will hold your information

There are provisions in UK law that dictate how long we can keep your information.

The Council will only hold and archive your information in line with its corporate retention schedule which has been compiled in accordance with UK legislation such as, but not limited to, the Health and Social Care Act, the Public Records Act and the Local Government Act.

Your rights

You have the following rights with regard to your personal information:

Right to be informed

You have the right to know the following:

- what information we intend to collect,
- why we need your information,
- the lawful basis under which we can process your information,
- how we will process your information,
- whether we share your information,
- who we might share your information with,
- your rights until the law,
- how long we will retain your information and how you can contact us.

This Privacy Notice should have detailed all of the above but if for any reason you are dissatisfied with our stewardship of your information, you have the right to lodge a complaint with the Information Commissioners Office (ICO), contact details are provided below.

Access to your information

If you would like to know what information we hold and process about you, the category of information, who we share your information with, to ascertain the accuracy of the information and the criteria we apply in processing your information, you can make a request to us in writing.

To make a subject access request and receive a copy of your personal information, contact Information Rights at:

Information Rights
Resource and Transformation Directorate
Walsall Council
Civic Centre
Darwall Street
Walsall
WS1 1TW



Walsall Council

Telephone: 01922 650000

By email:

informationrights@walsall.gov.uk.

Please be aware we will need you to provide appropriate identification but you can find details of this and everything else about our Subject Access Request process on our website or by typing the link below into your computer browser:

https://go.walsall.gov.uk/access_to_my_personal_records

We should respond to your request within 30 days of receipt but if the request is complex and more time is required we will inform you in writing.

Rectification of your information

If it is established that information we hold about you is incorrect, you have the right to request that we correct this information.

Erasure of your information

In cases where the information we hold about you is no longer required in relation to the purpose for which it was collected and where there are no lawful grounds for holding your information, you can request an erasure of information.

The Right to Restrict processing

You can restrict us from using your information if you believe the data is inaccurate or if there are no lawful grounds for using the information but you do not want us to delete the information. In addition you can prevent us from deleting information we no longer use or need if you require it for a legal claim or defence.

Following investigation, if it is determined that the right to restrict processing should not apply the Council will inform you of reasons for this before the restriction is lifted.

Right to Object

The following statement is only relevant to the information that you provided for **free school meals and early years pupil premium**:

If you object to the Council using your information in the ways detailed above we will cease to process your information unless we can show there are legitimate reasons which override your interests

Whether or not you have legitimate grounds to object to processing of your information, the Council will respond to your request within one month stating that your request has been upheld or the reasons for not upholding your request if that is the case.

Automated Decision Making

You have the right not to be subject to a decision which affects you, which is solely based on automated processing. This will include profiling.

This right will not apply if the automated decision making is necessary in anticipation of entering into a contract or if it is authorised in law. You can give us explicit consent to be subject to automated decision making but you can remove this consent at any time.



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Please be aware that the application of some of these rights is dependant upon the lawful basis for us to process your information. If you ask to enforce a right which is not applicable due to the reason for us processing the data we will explain the reasons for not upholding your request.

Walsall Metropolitan Borough Council's Data Protection Officer (DPO) is Paul Withers. If you have any questions about your rights under the GDPR, how the Council uses your information, or you wish to make a complaint about how we have processed or utilised your data, Paul will be able to help. How to contact our DPO:

Contact Address:

Office of the DPO

Resources & Transformation

Civic Centre 3rd Floor (HR Suite)

Walsall Council

Darwall Street

Walsall

WS1 1TP

Email Address:

Informationmanagement@walsall.gov.uk

Contact Telephone Number:

01922 650970

Should you be dissatisfied with the response you receive, you can contact the Information Commissioner's Office (ICO) with the details given on the following page:

ICO

Address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Email Address:

Use the online form via this link <https://ico.org.uk/global/contact-us/email/>

Telephone Numbers:

Calling from within the UK 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate.

Calling from outside the UK +44 1625 545 745.



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