

# Privacy Notice- Community Safety / Safer Wolverhampton Partnership

May 2018

**Data Protection  
Registration Number**

**Z5569755**

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## 1. Overview and Community Safety Data uses

The City of Wolverhampton Council (The Council) Community Safety Team works to prevent crime and disorder and keep communities safe from harm. The team manages the statutory Community Safety Partnership, known as the Safer Wolverhampton Partnership, which is a statutory requirement of the Crime and Disorder Act 1998. As part of these legal requirements, multi-agency meetings known as Partner and Communities Together (PACT) meetings are held with the community, and meetings held with local partners to discuss community safety concerns, which may include sharing the details of specific individuals for the prevention of crime and disorder.

This privacy notice tells you what to expect when Community Safety uses your personal information.

Your privacy is important to us, and we are committed to handling your personal data securely in line with UK Data Protection laws.

## 2. Why we process data

Some of the reasons are things which must be done by law/under our statutory obligations. Below are some examples of the many pieces of law that Community Safety operates within: The Care Act 2014, Licensing Act 2003, Housing and Planning Act 2016, The Privacy and Electronic Communications (EC Directive) Regulations 2003, Crime and Disorder Act 1998, Counter Terrorism and Security Act 2015, Anti-social Behaviour, Crime and Policing Act 2014. Housing Act 2004, Police and Justice Act 2006, Criminal and Disorder (overview and scrutiny regulations) 2009, Criminal Justice and Court Service Act 2000

Community Safety / Safer Wolverhampton Partnership use personal and identifiable data to carry out specific functions;

- We may share information to prevent crime and disorder and keep communities safe from harm including local fraud initiatives, including the use of CCTV.
- To meet statutory obligations
- To contact and consult with residents who are members of PACT
- For Data Matching, where personal details held by one organisation are checked against those held by another organisation. This allows potentially fraudulent claims, transaction, application, taxes and payments, anti-social behaviour and crime to be identified. For more information about the data matching the council does, have a look here: <http://www.wolverhampton.gov.uk/article/3060/Fair-Processing-Notice-Data-Matching>
- Safeguarding children and vulnerable adults
- Where relevant UK Data Protection laws allows us to use data. (Data Protection Act 1998, General Data Protection Regulation 2016/679, Data Protection Bill 2017-19 once enacted).
- Community Safety may also use non-identifiable data to derive statistics and intelligence to inform the development annual reports, needs assessments and strategic plans.

Such reports and strategies will:

- Identify priorities for action
- Inform decisions on the commissioning of services

- Allow for assessment of performance and identify areas of need
- Undertake equalities analysis

Some of the reasons will be because you have signed up to receive a service offered by the council or its partners, or given your consent for us to use your details to;

- Understand your needs
- Provide services that you have consented to receive
- Promote the services we provide
- Advise you of community meetings
- Seek information on community tensions and cohesion

We may not be able to provide you with a product or service unless we have enough information, or your permission to use your information. We aim to keep your information accurate and up to date.

### 3. Categories of data collected

Community Safety may need to collect your personal or special category data of a more sensitive nature, to deliver some of our services. This may be based as a legal requirement for the council to provide a service, or it may be a service you have signed up for (consented to).

No more information will be collected than is required to deliver that service.

Types of personal information we collect about you may include:

- personal details (name, date of birth)
- identification numbers (e.g. NHS number, National Insurance Number)
- family details
- lifestyle and social circumstances
- economic / financial details
- employment and education details
- housing needs
- visual images, personal appearance and behavior
- CCTV images
- licenses or permits held
- student and pupil records
- business activities
- case file information
- birth/death data provided by/to the office of national statistics

### 4. Who your data is shared with

#### Sharing to provide services

Your personal information may be shared with internal departments in the Council.

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It may be shared with external partners and agencies outside of the Council if there is a legal requirement to do so. This may include charities involved in delivering services on the Council's behalf. They will only have access to your information on a need to know basis. We will only share what they need to know to do the job or deliver a service to you. The privacy and security of sharing this information is checked when we start to work with someone new.

- Providers of goods and services; sometimes we ask other companies to provide services on the Council's behalf, such as waste collection, or computer systems provided by specialist companies, housing companies such as Wolverhampton Homes, Sanctuary Group, Nehemiah UCHA, Midland Heart
- Local and central government and other public bodies, for example the Home Office (HO)
- Other Local Authorities (other Councils)
- Health bodies in the local area, and sometimes nationally such as Wolverhampton GP's, The Royal Wolverhampton Hospitals NHS Trust, Black County Partnership NHS Foundation Trust, Wolverhampton Clinical Commissioning Group (CCG)
- Partners that are part of National or Regional improvement projects, for example, Recovery Near You (for drug and alcohol advice and support)

### **Sharing to comply with the Law**

Community Safety may also provide personal information to third parties, where it is necessary to do so to comply with the law. We will share where we are required to under UK Data Protection law (Data Protection Act 1998, General Data Protection Regulation 2016/679, Data Protection Bill 2017-19 once enacted). For example, we may need to use your information and share it with others for one or more of the following reasons; for the purposes of the prevention and detection of crime. These include, but are not limited to:

- Health bodies (NHS Trusts, GPs)
- The Police (West Midlands Police, Staffordshire Police)
- Staffordshire and West Midlands Community Rehabilitation Company/National Probation service
- Ofsted
- Local and central government and other public bodies.
- Other Local Authorities (other Councils)
- Courts, prisons
- West Midlands Fire Service

Agreements are in place with partners to share information where it is necessary and proportionate to do so. When we share information, we will ensure your data is protected, and will only share the minimum amount of data we need to provide you with a service. More information can be found at [City of Wolverhampton Council – Information Sharing](#). Where we need to share sensitive or confidential information such as medical details, we will do so only with your permission or where we are legally

required to. We may share sensitive or confidential information to prevent risk of harm to you or another person, for example to safeguard individuals.

## 5. How we collect your data and from where

Face to face	We may keep a record of your contact to assist on the delivery and improvement of the services we provide to you and others. Any such records that include any personal information will be kept securely.
Telephone calls	Ordinarily we will inform you if we record or monitor any telephone calls you make to us. This is to increase your security, for our record keeping of the phone call, and for training and quality purposes.
Emails	If you email us, we may keep a record of your contact and your email address for our record keeping. We will not include any confidential information about you in any email we send to you unless sent securely, or you have agreed to us contacting you with this information. We would also suggest that you keep the amount of confidential information you send to us via email to a minimum.
On paper	You may complete surveys, questionnaires or request forms on paper that you send to us. You may write us letters and send these in on paper.
Online	You may complete online forms, make requests, or make online payments to us. See our <a href="#">City of Wolverhampton Council - Privacy &amp; cookies</a>
On systems	We may log any information you provide to us on a computer system to help us keep track of your request, or any actions we need to complete. We may add your information to systems where we are required to by law.
From other sources	<p>We may receive information about you from other organisations or agencies such as:</p> <ul style="list-style-type: none"> <li>• Partners that are part of National or Regional improvement projects. For example; Recovery Near You (for drug and alcohol advice and support)</li> <li>• health bodies (NHS Trusts, GPs)</li> <li>• The Police</li> <li>• Courts, prisons</li> <li>• Other Local Authorities</li> <li>• Wolverhampton Homes &amp; TMOs</li> </ul> <p>We will receive information about you either for a legal reason, or because you are receiving a service jointly delivered by another organisation and the Council. You may have asked for your information to be shared with the Council. Information can be provided to us by any format described at the beginning of this section.</p>

	<p>We will match data from other sources to the data we hold at the council, to ensure we have the correct information about you.</p> <p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• If your health details are shared by your GP or Hospital with the Council for your health and social care, we will match your NHS number to our social care system to ensure your records are complete and link to the correct entry on our systems.</li> <li>• If your benefit details are shared by the DWP with the Council, we will match your national insurance number with our council tax and benefits system to ensure your records are complete and link to your record only.</li> </ul>
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## 6. How your data is used

Information which you have provided the Council will be stored securely, on encrypted and physically protected servers, systems or paper storage areas (Filing cabinets, archives). We will use your information for the reasons (purposes) stated when the information was collected from you. It will not be reused for different purposes, or sold on to others.

Your data will be placed on an appropriate system. It will be used to provide or administrate that service. We may cross reference this data between systems to keep your information as accurate and up to date as possible in line with Data Protection best practice.

Access to each of the Council's systems, for council staff, is based on a need to know basis. Not all council staff have access to all council systems; access to your data is strictly controlled, and only given to staff who have a real need to know to do their job. For a member of staff to access any system, this must be authorised by a manager. The council uses systems which can be audited to see who has used your records, so we can keep them confidential.

## 7. The Council's responsibilities

Everyone working for City of Wolverhampton Council has a legal duty to work within the Data Protection Principles. They must keep information about you confidential and secure, use it only for specific purposes and keep it only for as long as necessary. The Laws and best practice we abide by are;

- Data Protection Act 1998/ General Data Protection Regulation 2016/679
  - Human Rights Act
  - Caldicott Principles relating to confidentiality.
  - British Standard and International Standard (BS/ISO) 15489-Records Management
  - Lord Chancellors Code of Practice on Records Management
- Privacy Notice- Community Safety / Safer Wolverhampton Partnership (V3)

Where we share information with other bodies or agencies, we will ensure the confidentiality and security of your data. This will normally be done by having a contract and confidentiality clauses in place. We also carry out data privacy impact assessment each time we start a new project, to help us build in security and privacy to protect your information.

We will keep your information in line with legislation and guidance on records retention periods. We will not keep your information longer than it is needed. We will dispose of paper records or delete any electronic personal information in a secure way.

We do not share your data with private companies, unless they have a contract with the council to provide a service on behalf of the council. For example, a company who will conduct a survey on the council's behalf can only use the data we give them for our survey and they must delete it after the work has been done. Or where you have provided your consent for us to share with other private companies.

For more detail on how we work within these guidelines please reference our Information governance policies here: <http://www.wolverhampton.gov.uk/igov>

## 8. Online Cookies and Privacy

### Security

Wolverhampton City Council is committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

### Cookies

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your device, for example, your computer or mobile phone. These include small files known as cookies. They cannot be used to identify you personally. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### The Cookies we use and what they do

Cookie Name	Purpose
ARRAffinity	ARRAffinity is a cookie used to affinitize a client to an instance of a Microsoft Azure Web App. e.g. if an app is scaled out to 10 instances, and a user accesses it from their browser, the ARRAffinity helps keep the user going back to the same app instance, instead of getting a random instance each time. This can be useful for some apps that keep user state in memory.

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## 9. Your Data Rights

Under the Data Protection Act 1998/ General Data Protection Regulation 2016/679 and the Data Protection Bill 2017-19 once enacted, you have rights of how your personal and special category (known as sensitive) information is used.

Please see the Information Commissioners Office guidance on your rights here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- You have the right to be informed of how the Council are processing your data. This Privacy Notice explains this. Where you have signed up to a council service which relies on your consent alone (i.e.the services are not covered by a statutory duty) you have the right to withdraw your consent.
- You have the right to request that City of Wolverhampton Council stop processing your personal information or withdraw your consent in relation to any Council service. Where possible, the council will comply with your request but there may be some situations where we will not be able to do this for example where the council is required to hold or process your information to comply with the law. If you would like to stop receiving information from Community Safety or Safer Wolverhampton Partnership please email [Safer@wolverhampton.gov.uk](mailto:Safer@wolverhampton.gov.uk)
- A right to have inaccurate or out of date data corrected. Whilst the council tries to ensure that any personal information it holds about you is correct, there may be situations where information is no longer accurate. If you find this is the case, please contact the department holding the information and let them know or contact the Corporate Information Governance Team so that any errors can be investigated and corrected.
- You have the right of access to your data. All requests for access can be sent to the Council using the contact details are below.

Post:	Information Governance Team City of Wolverhampton Council Civic Centre St Peter's Square Wolverhampton WV1 1SH
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Telephone:	01902 554498
Email:	<a href="mailto:data.protection@wolverhampton.gov.uk">data.protection@wolverhampton.gov.uk</a>

For further information please contact the council's Information Governance Team.

## 9. How to raise a complaint about information

If you have a complaint in relation to your data rights or a freedom of information request, please contact us in the first instance to request an internal review of our response.

- For Data Protection/ Data Rights complaints, you can use the contact details form the "How to access information held about you" section.
- For Freedom of Information complaints, you can use the contact details form the "How to ask about other information held by the council" section.

If you follow this procedure and are still not happy, you may wish to contact The Information Commissioner's Office:

Post:	The Information Commissioner's Office Wycliffe House Wilmslow Cheshire SK9 5AF
Telephone:	08456 306060
Email:	<a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>