PRIVACY NOTICE

Housing – Refugee Resettlement – Homes for Ukraine Sponsors/Hosts

Who we are

Moray Council, Council Office, High Street, Elgin, Moray, IV30 1BX, moray.gov.uk 01343 543451, is a Local Authority established under the Local Government etc. (Scotland) Act 1994. We are the Data Controller of the personal data being collected. This privacy notice provides information for prospective and current sponsors/hosts who wish to provide accommodation to displaced Ukrainian people under the Homes for Ukraine sponsorship scheme.

Why we are collecting your personal data

Personal data will be collected about you so that we can arrange your guest's relocation to Moray. Some information about you will initially be received from the Scottish Government, through the information you provided on your initial application form. This includes your name, address, contact details and date of birth. We will use this data to contact you; we will then request and collect further details from you directly, such as your bank details. Your data is collected to:

- ensure that all requirements are in place for relocated families arriving in Moray
- ensure that relevant services are in contact with sponsors/hosts and guests
- ensure that the needs of guests are met in a timely manner
- ensure local services have capacity to support guests and identify where there may be accessibility issues
- ensure the safety of guests and sponsors/hosts, including making sure appropriate checks are carried out such as Enhanced Disclosure Checks and Property Inspections
- ensure that eligible hosts receive their Thank You Payment.

Personal data we collect from other sources

Your name, address, contact details and date of birth are provided to the Council from the Scottish Government when you have completed an application form to sponsor/host Ukrainian displaced persons.

Personal data you give us about other people

If you have provided, or have been asked to provide, someone else's personal data for a specific purpose, for example as an emergency contact, if reasonable to do so then please make sure that you have told them that you have given their personal data to us for this purpose.

Our legal basis

Whenever the Council processes personal data we need to make sure we have a legal basis for doing so. We understand the Council's legal basis in data protection law to be

Article 6(1)(e) of the United Kingdom General Data Protection Regulation (UK GDPR) because your personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council under:

- the Immigration and Asylum Act 1999
- Section 20 of the Local Government in Scotland Act 2003
- Section 12 of the Social Work (Scotland) Act 1968

In carrying out this function the Council is also likely to process special categories of personal data, such as data about health, ethnicity and religion. We understand our legal basis in data protection law for processing special category personal data to be Article 9(2)(g) of the UK GDPR, and Schedule 1, Part 2, paragraph 6 of the Data Protection Act (DPA) 2018, as the processing is necessary for reasons of substantial public interest for statutory and government purposes (for the exercise of functions conferred under the above legislation and the Housing (Scotland) Acts 1987 and 2001 and the Homelessness etc. (Scotland) Act 2003), and, Schedule 1, Part 2, paragraph 18 of the DPA 2018 – Safeguarding of children and individuals at risk.

Personal data relating to criminal convictions or offences may also be processed. We understand our legal basis in data protection law for processing this data to be Article 10 of the UK GDPR, together with Schedule 1, Part 2, Paragraph 6 of the DPA 2018; as the processing is necessary for reasons of substantial public interest for statutory and government purposes (for the exercise of functions conferred under the above legislation and the Housing (Scotland) Acts 1987 and 2001 and the Homelessness etc. (Scotland) Act 2003), and, Schedule 1, Part 2, paragraph 18 of the DPA 2018 – Safeguarding of children and individuals at risk.

Who we share this personal data with

Your personal data will be shared with and from a number of third-party organisations to ensure that appropriate safeguarding checks are carried out and that the appropriate supports are in place for sponsors/hosts and guests. These include Disclosure Scotland (for Enhanced Disclosure Checks), Police Scotland and the NHS.

We may also share data about you with other internal Council Services such as Education (where guests have school age children), Housing, Social Work, the Community Safety team and Council teams who carry out Property Inspections.

We may share some of your information with interpreters who provide your guests with language or personal support to help them to integrate in Moray. The information shared is limited to the minimum information needed, such as your address for pre-arranged visits. We only use registered interpreters bound by the code of practice of community interpreters.

The Council will also receive information about your guest(s). Please see our Refugee Resettlement Privacy Notice available here: www.moray.gov.uk/PrivacyNotices

Statistical information regarding Resettlement in Moray will be shared with UK Government and Scottish Government, in line with funding instructions. This data will not identify you or your family.

Your personal data may be shared internally with authorised officers of the Council if having access to personal data is a necessary part of their roles to ensure records are accurate and up to date. It may also be shared with other relevant Council Services where applicable.

The Council may share your personal data with other relevant Council Services and third parties, where we are under a legal obligation to do so. For example, this may be with Police, Social Security Scotland, UK Border Agency, or other Registered Professional Bodies.

The Council is required by law to protect public funds against fraud. It may share personal data with other relevant Council Services and third parties responsible for auditing and administering public funds, or who otherwise have responsibility for preventing and detecting fraud.

How long the personal data is held for

Your personal data will be securely stored by Moray Council for a pre-determined length of time. Information is only kept for the minimum amount of time necessary. We maintain a record retention schedule which sets out how long we retain different types of personal data. This is available on our website: www.moray.gov.uk/RetentionSchedules (under Section 5 of the Records Management Plan).

The Council stores information within the UK.

Your rights

Moray Council is the Data Controller for this personal data. You have legal rights about the way the Council handles and uses your personal data. These include the right to ask for a copy of it, to ask us to correct it and to ask us to stop doing something with your personal data.

As so far as the legislation permits, you also have the right to request the deletion of your data, and to object to the processing.

For more information about these rights, please see the Information Management pages on the Council's website here: www.moray.gov.uk/InformationRights. Alternatively, email the Council's Data Protection Officer at: IG@moray.gov.uk

If you have a concern about the way the Council has handled your personal data, you can make a complaint to the Council's Data Protection Officer in the first instance; an e-form is available on the Council's website here: www.moray.gov.uk/Complaints

You also have the right to make a complaint to the Information Commissioner's Office. They are the body responsible for making sure organisations like the Council handle your personal data lawfully.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113 Website: https://ico.org.uk/
Online: https://ico.org.uk/make-a-complaint/data-protection-complaints/