



Privacy Notice

Homes for Ukraine Scheme - Guests

The council provides services for local communities and the people who live in them. Undertaking this work means that we must collect and use information about the people we provide services to and keep a record of those services. Because we collect and use personal information about individuals, we must make sure that they know what we intend to do with their information and who it may be shared with.

This Privacy Notice covers the [Homes for Ukraine Scheme](#) as enacted by the UK Government.

When processing personal data, the council is required under Articles 13 and 14 of the UK General Data Protection Regulation (UKGDPR) to provide individuals with the information contained in this document.

Data Ownership

Name	Cumbria County Council
Address	Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Registration Number	Z5623112

This information is also available via the Information Commissioner's Register of Fee Payers at: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

Data Protection Officer

The council's Data Protection Officer is Claire Owen and can be contacted by:

Email: dataprotection@cumbria.gov.uk
Post: Cumbria County Council, Legal and Democratic Services, 1st Floor,
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

Purpose

This scheme will support Ukrainian people with housing, education, health and integration into the community. As well as supporting the people who volunteer to sponsor Ukrainian people and their families.

It must be noted that during this time councils have to quickly change the way in which they are working to continue to provide you with the support and services you need. We will always follow advice and guidance from the UK Government when making any changes to the way in which we provide you with the support you need.

To enable Cumbria County Council to co-ordinate and deliver appropriate and suitable housing and accommodation offers provided by vetted sponsors, to visa-cleared applicants to the scheme fleeing the conflict in Ukraine, we will process the following information.

"Guest" or "guests" refers to an individual or household previously resident in Ukraine, before 1 January 2022, who have secured a visa under the Homes for Ukraine scheme, which enables them to be housed by a sponsor.

The sharing of information facilitates a joined-up approach with partner agencies, to ensure support to the delivery of the Homes for Ukraine Scheme.

Data Collection

We will use the information you provide to:

- Facilitate the Homes for Ukraine sponsorship scheme within Cumbria
- Undertake assessments to establish what support we can put in place for you and your family, as well as assessing the sponsor household
- Keep a record of the support that we will be providing to you
- Undertake regular reviews to establish whether the programme is working for you, or whether we need to change anything to help you

This will include:

- Developing post arrival support plans involving organisations such as health and support services

We also use this information to assess the quality of our services and evaluate and improve our policies and procedures.

We may also use information in other ways compatible with the above.

Data Types

To enable Cumbria County Council to co-ordinate and deliver appropriate and suitable housing and accommodation offers provided by vetted sponsors, to visa-cleared applicants to the scheme fleeing the conflict in Ukraine, we will process the following information:

The **Personal Data** requirements are:

- Name
- Address
- Contact details including telephone number, email address
- Date of birth
- Visa/passport information
- Family members information, including any children
- Information relating to any safeguarding concerns

We receive most of this information from you, but we may also get some of this data from:

- Home Office
- Department for Levelling Up, Housing and Communities
- Other central or local government agencies
- Disclosure and Baring Service providers

The **Special Category Data** requirements are:

- Information about your nationality or ethnicity
- Information about your health including disabilities
- Information about your religion

The **Criminal/Law Enforcement Data** requirements are:

- Allegations
- Charges
- Offences

Legal Basis for Processing Data

Where the council identifies the requirement to process personal, special category/sensitive or criminal/law enforcement data, depending on the specific data being shared, it must have at least one of the following:

- for personal data, a legal basis under **UKGDPR Article 6**,
- for special category/sensitive data, a condition under **UKGDPR Article 9**
- for criminal/law enforcement data, a purpose under **UKGDPR Schedule 8**

The following **legal bases** apply to the processing of your personal data:

- **UKGDPR Article 6(1) (e) Public Task/Public Interest/Official Authority**

Where the LGR Programme is relying on UKGDPR Article 6(1)(c) all [Relevant Legislation](#) should be listed below.

The following **conditions** apply to the processing of your special category/sensitive data:

- **UKGDPR Article 9(2) (g) Substantial public interest**

The following **purposes** apply to the processing of your criminal/law enforcement data:

- **UKGDPR Schedule 8(1) Statutory Purposes**

Relevant Legislation

- [Immigration and Asylum Act \(1999\), Section 20](#)
- [Data Protection Act 2018 - Schedule 1 Part 2 Section 6 - Statutory and Government Purposes](#)

Automated Decision-Making/Profiling

Automated individual decision-making is a decision made by automated means without any human involvement. Automated individual decision-making does not have to involve profiling, although in some cases it might.

A definition of Profiling can be found in: [UK GDPR - Article 4\(4\)](#) and further information can be found at: [ICO - Automated Decision Making and Profiling](#)

We **do not** use your information for automated decision-making or profiling purposes.

Data Transfers

Your personal data **is not** transferred to a third country or international organisation.

Redaction

We operate a policy where we routinely redact the following details before making forms and documents available online:

- contact details e.g., telephone numbers, email addresses
- signatures
- personal or special category data
- information agreed to be confidential or commercially sensitive

Occasionally it may be considered necessary, justified and lawful to disclose data that appears in the list above. In these circumstances the council will make all reasonable efforts to contact you if this processing is going to have an impact on your rights or privacy.

Data Sharing

To achieve the [purpose](#) laid out above, the council will share [specific data](#) with:

- Home Office

- Department for Levelling Up, Housing and Communities
- local authorities, including district, borough and city councils
- central government agencies
- NHS, CCGs
- charities and other voluntary organisations (so that they can contact you and/or to provide services if required)

While responding to your enquiries or complaints it may be necessary to share your personal data with other parts of the council or other public bodies or organisations. All reasonable efforts will be made to contact you if this processing is going to have an impact on your rights or privacy.

Data Security and Retention

The data, collected from you or supplied by other agencies about you, will be kept on a secure system and can only be accessed by authorised employees.

Cumbria County Council will only store your information for as long as is legally required in accordance with the council's [Retention and Disposal Schedule \(EXCEL 267KB\)](#) or in situations where there is no legal retention period established best practice will be followed. To help you understand the Schedule the council has published a [Retention Schedule - Quick User Guide \(PDF 787KB\)](#). If you have any questions about the Schedule or the Quick User Guide, please contact: recordcentre@cumbria.gov.uk.

If you experience any problems in relation to your personal data or you see something that doesn't look right, get in touch to report it as a [Data Breach](#).

Please note: Privacy Notices cannot be finalised and published without identifying the correct retention period.

If we need to use your information for research or reports, your information will be anonymised and any information taken from notes (handwritten or typed) during any consultation sessions will be securely destroyed. The information will continue to be used in a summarised and anonymised form in any research reports or papers that are published. The anonymised information in the papers may be of historic interest and may be held in public archives indefinitely.

Your Rights - Data Subject Access

The UKGDPR provides you with the right to access information the council, as a public authority holds about you. Upon receipt of a valid request the council will:

- provide you with a response within one month
- let you know if your request is subject to an extension
- make reasonable efforts to comply with the format of your request
- inform you if your request is going to be refused or a charge is payable.

You can make a Data Subject Access Request (DSAR) by contacting:

Email: information.governance@cumbria.gov.uk
Post: Cumbria County Council, Information Governance Team
Parkhouse, Baron Way, Carlisle CA6 4SJ
Telephone: (01228) 221234
Online: [Contact Form](#)

Your Rights - Other

In addition to your right of access the UKGDPR also gives you the following rights:

- the right to be informed via the council's Privacy Notice
- the right to withdraw your consent. If we are relying on your consent to process your data then you can remove this at any point
- the right of rectification, we must correct inaccurate or incomplete data within one month
- the right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information
- the right to restrict processing. You have the right to suppress processing. We can retain just enough information about you to ensure that the restriction is respected in future
- the right to data portability. We can provide you with your personal data in a structured, commonly used, machine readable form when asked
- the right to object. You can object to your personal data being used for profiling, direct marketing or research purposes
- you have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Unless otherwise stated above you can exercise any of these rights by contacting:

Email: dataprotection@cumbria.gov.uk
Post: Cumbria County Council, Legal and Democratic Services, 1st Floor,
Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

Verifying Your Identity

When exercising the rights mentioned above please be aware that under UKGDPR Article 12(6) additional information can be requested to verify that you are the data subject if your identity is unconfirmed. Please note that:

- additional documentation is only required when the council cannot verify your identity using internal council systems that relate to the service you are requesting information about
- the council will contact you for this documentation prior to processing your request
- the statutory deadline for responding to your request will start when you have provided the additional documentation
- failure to provide additional documentation may lead to the council rejecting your request.

Complaints

If you have any concerns about the information contained in this Privacy Notice, please contact: HomesForUkraine@cumbria.gov.uk.

If you have concerns about the way the council has processed your data, please contact the council's Data Protection Officer via:

Email: dataprotection@cumbria.gov.uk
Post: Cumbria County Council, Legal and Democratic Services, 1st Floor, Cumbria House, 117 Botchergate, Carlisle, Cumbria CA1 1RD
Online: [Contact Form](#)

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

Reviews and Updates

In accordance with UK GDPR Article 13(3) where either, the extent of the data being collected or the purpose for collecting it changes this notice should be updated and republished, to ensure that data subjects are properly informed