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<b>Service Area:</b>	Social Services
<b>Work Area:</b>	Information Advice and Assistance Service (IAA)
<b>Contact Details:</b>	Tel: 0808 100 1727 Email: contactandreferrals@caerphilly.gov.uk
<b>Privacy Notice Name:</b>	Caerphilly Joint Assessment Family Framework (JAFF) - referrals for intervention
<b>Description of Privacy Notice:</b>	This privacy notice will explain how Caerphilly County Borough Council will use the information you provide when completing the Caerphilly Joint Assessment Family Framework (JAFF) form.

## How we will use your information

### Purpose and legal basis for using your information

#### Purpose of processing

Service users are able to get Information, Advice and Assistance (IAA) from a wide range of providers within the Caerphilly borough area.

- If Information is required, we will not record any information about you on our systems.
- If Advice is required we will need to record your name, contact details and the nature of the advice provided for our records.
- If Assistance is required (referral to a support service) with your consent, we will collect information about you in order to offer the right support to meet your needs. This information is collected on the Joint Assessment Family Framework (JAFF) Form. This JAFF Form will be securely forwarded to CCBC's Information Assistance and Advice Service for assessment and allocation to an appropriate support service. Alternatively the JAFF Form may be sent directly to the relevant CCBC Service e.g. Flying Start or Supporting People. All information will be shared securely.

The support service allocated may be a CCBC service or it may be service offered by another organisation but they will have the right expertise to offer support to meet those needs identified. If there are organisations you do not wish to work with you must let us know when the JAFF Form is being completed so that your information is not passed to them and an alternative can be found.

The support service allocated may need to share your information further. If this is the case further information on how your information will be used will be provided to you.

After your work with the support service is complete, feedback such as how you engaged and how your goals were met will be shared back to CCBC's Information Assistance and Advice Service / Flying Start / Supporting People.

If it is identified that you have outstanding needs, with your consent, your JAFF Form will be securely forwarded to CCBC's Information Assistance and Advice Service / Flying Start / Supporting People for an additional assessment to be carried out and for your JAFF Form to be assessed, allocated and securely shared with an additional appropriate support service.

If it is believed at any stage of the process that a child may be at risk your the All Wales Child Protection Procedures will be followed, which may result in a formal investigation and assessment. This may involve several agencies such as the police, health or education.

## **Legal basis for processing**

Service user consent is required to enter into the JAFF process. However the legal basis for processing service user information is public task as outlined below:

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

Article 6 - 1e. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

### Data Protection Act 2018 – Section 8

In Article 6(1) of the GDPR (lawfulness of processing), the reference in point (e) to processing of personal data that is necessary for the performance of a task carried out in the public interest or in the exercise of the controller's official authority includes processing of personal data that is necessary for—

- (a) the administration of justice,
- (b) the exercise of a function of either House of Parliament,
- (c) the exercise of a function conferred on a person by an enactment or rule of law,
- (d) the exercise of a function of the Crown, a Minister of the Crown or a government department, or
- (e) an activity that supports or promotes democratic engagement.

Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. If any information falls within the definition of special category personal data then an additional condition from Article 9 of the Regulations must be identified.

Data Protection legislation also provides extra protection for personal data in relation to criminal convictions and offences. If any personal data falls within this category then an additional condition from Article 10 of the Regulations must be identified.

The condition detailed below is both an Article 9 and an article 10 condition for processing.

### Data Protection Act 2018 – Schedule 1 – Part 2

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- (1) This condition is met if the processing—
    - (a) is necessary for a purpose listed in sub-paragraph (2), and
    - (b) is necessary for reasons of substantial public interest.
  - (2) Those purposes are—
    - (a) the exercise of a function conferred on a person by an enactment or rule of law;
    - (b) the exercise of a function of the Crown, a Minister of the Crown or a government department.

The function conferred on a person (CCBC) by an enactment or rule of law relevant to the above conditions is set out in the Well-Being of Future Generations (Wales) Act 2015. This Act sets seven well-being goals to show the kind of Wales we want to see and places a legal obligation on public authorities to work to achieve these goals which includes:

- A prosperous Wales
- A healthier Wales
- A more equal Wales

## **Who will have access to your information**

### **Identity of Data Controller and Data Protection Officer**

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones  
Corporate Information Governance Manager / Data Protection Officer  
Email: [dataprotection@caerphilly.gov.uk](mailto:dataprotection@caerphilly.gov.uk)  
Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

### **Details of main users of your information**

Your chosen Information Advice and Assistance (IAA) provider will hold a copy of your completed JAFF Form which will be shared with CCBC's Information Advice and Assistance Service / Flying Start / Supporting People. CCBC's Information Advice and Assistance Service / Flying Start / Supporting People will hold a copy of your completed JAFF Form, carry out an assessment and will then share the JAFF Form with the appropriate support service that can meet your need.

The support service allocated will hold a copy of your completed JAFF Form and when their work with you is complete, will complete the closure section of this form and return it to CCBC's Information Advice and Assistance Service / Flying Start / Supporting People. The support service allocated may be a CCBC service or it may be service offered by another organisation.

Your information will be stored on a CCBC database and also the Welsh Community Care Information System (WCCIS), which is a joint system for providers of Social Care, Community Health and Mental Health services in Wales. Further information on WCCIS is available from our website.

[www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/WCCISPrivacyNotice.aspx](http://www.caerphilly.gov.uk/CaerphillyDocs/FOI/PrivacyNotices/WCCISPrivacyNotice.aspx)

Access to your information will be controlled, allowing relevant practitioners access to the information that they need to see, when they need it, to support the safe delivery of care to citizens of Wales.

### **Requests for information**

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

## How long will we retain your information

### Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

Non- CCBC Information, Advice and Assistance providers will only retain your completed JAFF Form for a maximum of 4 weeks after it has been securely emailed to Caerphilly County Borough Council.

CCBC will retain a copy of your JAFF Form for 10 years following last date of contact in relation to the assistance provided.

## Your Rights (Inc Complaints Procedure)

### Your rights under the Data Protection

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: [www.ico.org.uk](http://www.ico.org.uk).

To enact your rights please contact the service area detailed on the top of this form.

### Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

[www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints](http://www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints)

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# Summary Privacy Notice

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If personal data is requested from a data subject, the Summary Privacy Notice should be contained in the form if used or at the bottom of the request communication if a form is not used.

If the data subject provides us with their personal information which has not been requested then the Summary Privacy Notice should be contained at the bottom of the acknowledgment letter.

If the personal data was obtained for a source other than the data subject, we have an obligation to inform the data subject that we have received / processing information about them, unless an exemption is applicable. This Summary Privacy Notice should be contained at the bottom of that communication.

## How we will use your information

{Summarise key information from full privacy notice}

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

{[Hyperlink to Full Privacy Notice on our website](#)}

NB Privacy Notices and Summary Privacy Notices must be approved by the Corporate Information Governance Unit (CIGU) before being issued/used. Once approved the completed document will be sent by the CIGU to the Welsh Unit for translation which they will produce in the Welsh version of this template.