

# Privacy Notice (How we use your information)

## Customer Service Centres, Kirklees Direct and 24-Hour Service

There are two main customer service centres within Kirklees, in Huddersfield and Dewsbury, who work in conjunction with Kirklees Direct and the 24-Hour Service. These teams are there to provide access to expert help and advice and to ensure your enquiry is directed to the most appropriate service as swiftly as possible. In the customer service centres we also provide access to PC's and phones so you can contact a service or department directly.

### **The categories of information that we collect, process, hold and share include:**

When you contact us by phone, email, webchat, in person or through the Council's website; we may need to collect personal information about you or your family so that the appropriate service can be provided. We will only ever collect enough personal data to make sure we are speaking to the relevant account holder and to direct your call or enquiry to the relevant person or service. Some of the most common data we collect is:

- Personal information
  - First name
  - Family name or surname
  - Household Members
  - Address
  - Telephone numbers
  - Date of birth
  - National Insurance number
  - Email address
  - Payment information
  - Health and Social Care Needs
  - Finance (e.g., including but not limited to, Bank Statements, Pension or DWP Benefit letters)
- Characteristics
  - Gender
  - Age
  - Carer
  - Disability
  - Ethnicity

From time to time the Council may conduct a survey or carry out consultations. To make sure we are reaching everybody we might ask if you are happy to give some personal details such as your gender, ethnicity or marital status. You can choose not to give this information. If you choose to give us this information, it will ensure we have feedback from all communities, but it will not identify you.

## Why we collect and hold this information

We use this personal data for the following reasons:

- to ensure we meet our legal requirements
- to allow us to communicate and provide services appropriate to your needs
- where we are legally obliged to undertake data processing e.g., for licensing, planning enforcement, council tax, food safety, prevention and/or detection of fraud and crime
- to process financial transactions or where the council is acting on behalf of other government bodies e.g., Department for Works and Pensions
- where necessary to protect citizens from harm or injury
- to conduct research or statistical analysis that allows us to target and plan the provision of services
- to identify residents/users for the purpose of notifying them of proposed or planned changes to services that may affect them
- to assist the council in responding to emergencies or major accidents. This allows the council, in conjunction with the emergency services, to identify citizens who may need additional support.

Please note phone calls to our customer service teams may be recorded for training and quality improvement purposes

CCTV cameras are installed in our Customer Service Centres and in public areas of our buildings. These cameras are marked with signs at each entrance. These cameras are recording 24/7, 365 days a year. The footage is used to ensure the safety of our employees, tenants, visitors and members of the public, to prevent crime and to prosecute offenders or review an incident which could have resulted in prosecution or injury. If an individual wishes to view the footage of themselves, they can make a subject access request (see the section below on “Your data protection rights”). They will need to provide the name of the building, the date and time of the visit. Please note that the Service Manager needs to ensure that the identity of any other individuals is not revealed, before agreeing to provide footage.

## The lawful basis on which we use this information

Customer services, Kirklees Direct and the 24-Hour Service provides Face to Face, Telephone and Web chat contact for the residents of Kirklees so they can access a range of Services provided by Kirklees Council.

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is:

**6(e) We need it to perform a public task.** (e.g., Council Tax, Blue Badges, Waste, Highways etc.)

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In order to do this work, we may also need to collect some special category data. This is personal data that needs more protection because it is sensitive. Also, by operating CCTV, we may capture sensitive and special category personal data along with an inference of information such as gender, race, ethnicity and such like. Under Article 9 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing special category information are:

**9(2)(b) Employment, social security and social protection** (e.g., Local Government Finance Act 1992, Section 21 of the Chronically Sick and Disabled Persons Act 1970 and the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000, The Concessionary Bus Travel Act 2007, The English National Concessionary Travel Scheme)

**9(2)(g) Reasons of substantial public interest** (e.g., Equality Act 2010, Fraud Act 2006, Housing Act 2004 Care Act 2014. Statutory and government purposes, equality of opportunity or treatment, preventing or detecting unlawful acts, protection of the public, prevention of fraud, support for individuals with a particular disability or medical condition, safeguarding of children and individuals at risk, safeguarding of economic well-being of certain individuals etc)

**9(2)(h) Health or social care** (e.g., The Health and Social Care Act 2012, The Care Act 2014)

## How we store your personal information

Information collected by Customer services, Kirklees Direct and the 24-Hour Service will either be stored in a Secure Network Drive managed by Kirklees Council or stored within the Microsoft Office 365 GDPR compliant environment. CCTV footage is recorded on encrypted digital media and secured against public access.

The retention schedules detailed below are specific to Customer services ([Appendix 1](#)), Kirklees Direct and the 24-Hour Service ([Appendix 2](#)). They detail the processes for which we collect personal data, how long we store your personal data for and how it is deleted. For information on how other services manage your personal data please refer to [www.kirklees.gov.uk/privacy](http://www.kirklees.gov.uk/privacy).

## Who we may share your information with

We may sometimes share the information we have collected about you where it is necessary, lawful and fair to do so. In each case we will only share the minimum amount of information, only when required, for the following reasons:

- To comply with a legal obligation.
- Where the disclosure is necessary for the purposes of the prevention and/or detection of crime.
- To develop local and national policies (Anonymised data only).
- To manage local authority performance (Anonymised data only).
- To identify and encourage good practice (Anonymised data only).

We may share this information with:

- Other services within Kirklees Council.
- National government department e.g. Department for Work and Pensions.

- Other partners such as health and the police.

We do not share personal information about you with anyone else without consent unless the law allows us to do so.

## Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [Data.protection@kirklees.gov.uk](mailto:Data.protection@kirklees.gov.uk) if you wish to make a request.

## Further information

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#).

If you would like further information about this privacy notice, please contact: [GDPR.Access toServices@kirklees.gov.uk](mailto:GDPR.Access toServices@kirklees.gov.uk). If you have any worries or questions about how your personal data is handled, please contact the Data Protection Officer at [DPO@kirklees.gov.uk](mailto:DPO@kirklees.gov.uk) or by ringing 01484 221000.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact the ICO via the ['Contact us' page on their website](#), or by ringing 0303 123 1113.

## Appendix 1 Customer Service Centres - Retention Schedule

### Internal Systems

Record related to...	Activity/used for	Stored System	Agreed retention period	Disposal Arrangements
<b>Blue Badge Record Log</b>	Details of Blue Badges handed in and expired.	Secure Network Drive	no older than 3 months	<i>Business Support Officer to check and delete every month. Number of records recorded in destruction log.</i>
<b>Blue Badge Photos</b>	Copy of customers photograph for Blue Badge	Secure Network Drive	no older than 6 months	<i>Business Support Officer to check and delete every month. Number of records recorded in destruction log.</i>
<b>PCIDSS Consent Forms</b>	Paper record - consent form, signed by customer to confirm they require help making a bank card payment.	Paper copy only	No records older than 3 months (2 months minimum)	<i>Business Support Officer to check every month and place paper records in Secure bins for shredding. Number of records recorded in destruction log.</i>
<b>CSO Notes</b>	Daily notes made by CSO to help with Customer Enquiries.	Paper Copy only	1 day	<i>Customer Service Officer to place in confidential waste bin at the end of every day. Number of records recorded in destruction log.</i>
<b>Record of Security Incidents</b>	Personal data stored for the purpose of issuing a warning or banning letter	Secure Network Drive	Cases reviewed every 6 months, and a decision is made whether to keep the ban or warning letter in place.	<i>Electronic file deleted by Customer Service Manager.</i>
<b>CCTV Footage</b>	Camera footage recorded for the protection of staff and customers	NVR/DVR	Footage automatically recorded over every 30 Days	<i>Footage automatically recorded over every 30 Days</i>

## Appendix 2 Kirklees Direct and 24-Hour Service – Retention Schedule

### Internal emails

Record related to...	Activity/used for	Stored System	Agreed retention period	Disposal Arrangements
<b>SMILE</b>	Service requests from members of the public of a variety of services	SMILE - IT CRM System	2 years	<i>IT programmed a schedule rolling monthly deletion</i>
<b>Whitespace</b>	Service requests from members of the public of a variety on Streetscene cleansing section	Whitespace	2 years	<i>Job run by Whitespace / Power Suite. Managed by Environment IT team</i>
<b>KD Seniors</b>	Service feedback, service updates, request to call customer	Outlook	12 months	<i>Kirklees Direct Seniors responsible for electronic deletion/disposal</i>
<b>KD Duty Ops</b>	Agency Staff Info	Outlook	6 months	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>KD Ops</b>	Daily monitoring of the whole of KD, and main contact for other services for technical issues. Request to call customer	Outlook	6 months	<i>Intraday Analyst responsible for electronic deletion/disposal</i>
<b>KD RBST</b>	Revenues & Benefits support team, internal communication.	Outlook	18 months	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Contact Centre</b>	Internal service communication	Outlook	18 months	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>

Record related to...	Activity/used for	Stored System	Agreed retention period	Disposal Arrangements
<b>KD Donotreply</b>	Emails sent from non-personal email account to customers	Outlook	6 months	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Social Access</b>	Internal email, communication from external social media	Outlook	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>

#### External emails

Record related to...	Activity/used for	Stored System	Agreed retention period	Disposal Arrangements
<b>Waste</b>	Email enquiries from residents about waste services issues	Outlook	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Customer Enquiries</b>	Email enquiries from residents and companies regarding any council service	Outlook	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Housing Direct</b>	Email enquiries from residents and KNH regarding council house repairs	Outlook	12 months	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>

**Internal Systems**

Record related to...	Activity/used for	Stored System	Agreed retention period	Disposal Arrangements
<b>SMILE</b>	Service requests from members of the public of a variety of services	SMILE - IT CRM System	2 years	<i>IT programmed a schedule rolling monthly deletion</i>
<b>Call Evaluation</b>	Quality monitoring of KD officers calls	Liberty	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Complaints</b>	Official/stage 1 complaints from customers or services about KD officers	In house access database	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Feedback</b>	Service feedback for KD officers	MS Teams	18 months	<i>Kirklees Direct Customer Service Senior Team responsible for electronic deletion/disposal</i>
<b>Support database</b>	In-house database where officers end more complex service queries to be dealt with by support officers	MS Teams	12 months	<i>Kirklees Direct Customer Service Senior Team responsible for electronic deletion/disposal</i>
<b>Online Support</b>	Internet and social media enquiries from members of the public	Outlook	2 years	<i>Kirklees Direct Customer Service Manager responsible for electronic deletion/disposal</i>
<b>Helpline</b>	Telephone Line - KD specific and exceptional enquiries from members of the public	Staff Account - Outlook	1 month	<i>All Kirklees Direct staff reminded on a monthly basis to delete files and emails containing Citizen data.</i>