



Comhairle Chontae na Gaillimhe **Galway County Council**

Privacy Policy – Online Home Fire Safety Check

Document Information

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Owner	Galway County Council
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1			Privacy Policy - Online Home Fire Safety Check
2	PD	26 Nov 2020	MH and DPO comments updated
3	PD	08 Dec 2020	Final

1. Galway County Council

Galway County Council is the local authority for the County of Galway and in performing its functions, Galway County Council is required to process significant amounts of “Personal Data” within the meaning of the Data Protection Acts 1988 / 2003/2018 (“the Acts”) and the European regulations 2016/679 (GDPR). Galway County Council respects the privacy rights of those whose Personal Data we process and we are conscious of our obligations under the Data Protection Acts.

This Privacy Notice explains how Galway County Council will process Personal Data collected through the online Home Fire Safety Check being used by Galway Fire and Rescue Service as the Fire Authority under the Fire Services Act 1981 / 2003.

2. What is an Online Home Fire Safety Check

Traditionally, Galway Fire and Rescue Service (GFRS) has distributed Home Fire Safety Packs including a paper-based home fire safety checklist as part of their community fire safety programme, which is a requirement of Government policy under Keeping Communities Safe 2013. GFRS is now moving to an on-line Home Fire Safety Checklist in order to improve efficiency, and the number of homes receiving the checklist.

The online checklist helps us to identify homes in the community where the occupants, for any reason, would not be able implement a fire safety strategy or evacuate the dwelling on their own in the event of fire. As a result, those homes may be at a higher risk of fire. It is the policy of GFRS to offer such homes a Home Fire Safety Visit in order to improve the fire safety of the dwelling and collectively improve community fire safety.

The on-line system is an optional one which will be advertised via a media campaign and through large organisations. Applicants who participate can opt out at any stage by e-mailing GFRSPIP@galwaycoco.ie.

3. What type and How Will Personal Data be Collected?

In order to complete the online Home Fire Safety Check, a dwelling owner must provide two pieces of information as follows:

- The location of the dwelling. This can be done by typing in an Eircode, or an address, or by physically indicating the location on the map provided.
- Applicant’s e-mail address – so that the applicant can receive a copy of the completed Home Fire Safety Check and a copy of our Home Fire Safety Pack. If the dwelling is identified as high-risk dwelling, we may use the e-mail address provided to arrange a Home Fire Safety Visit subject to the applicant’s agreement. Otherwise, any e-mail address provided will only be used to remind the applicant to re-complete your Online Home Fire Safety Check on an annual basis or more frequently for higher risk dwellings.

4. What is Our Lawful Basis for Processing the Personal Data in this Instance?

Galway County Council’s lawful basis for processing Personal Data collected from the online Home Fire Safety Check is as follows:

- Article 6(1)(d) of the Data Protection Act 2018 determines that processing is lawful where it is necessary in order to protect the vital interests of the data subject or of another natural person
- Article 6(1)(e) of the Data Protection Act 2018 determines that processing is lawful where it 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

- Galway County Council / Galway Fire and Rescue Service public interest / public safety remit is enshrined in the Fire Services Acts 1981 and 2003 as a Fire Authority as per Section 9(1)(a) and (d) and Section 10(2)(a)

5. Who Will Have Access to the Personal Data in this Instance

The completed Home Fire Safety Checklist and the dwelling location will be shared internally with officers of the Fire Service that provide the local Fire Brigade in the area where the dwelling is located and who conduct Home Fire Safety Visits to homes. The dwelling location is accessed through the GFRS GIS based **Community Risk Identification and Status Planning Platform (CRISP-P)**. The applicant's e-mail address is not included in or visible on this system. Effectively, this is akin to obtaining the address on the Eircode database which is publicly available.

The e-mail address is restricted to 3 nominated senior managers within GFRS and the Galway County Council GIS section who manage the CRISP-P project. The e-mail address is stored on a secure system that requires individual log-in credentials.

The e-mail address may be shared with GFRS officers who conduct optional Home Fire Safety Visits if and only if the applicant gives permission for such a visit by e-mail. Such visits require a GFRS Home Visit Form to be filled out for insurance and indemnification purposes. This additional form includes the applicant's name and a separate privacy notice. This additional piece of information is submitted to the three senior managers and is not available to any other staff. This information will not be used on any reminder issued in relation to re-completing the Home Fire Safety Checklist.

We may on occasions use the e-mail address to contact the applicant to ask for feedback on the service we provided to them, or conduct research aimed at promoting public safety. The applicant does not have to respond to these requests or provide any feedback or information, and any feedback or information that is provided will only be used to improve or optimise our services.

6. Who Will the Personal Data be Shared With in this Instance

Other than access described in section 5 above, the personal data will not be ordinarily shared with any other members of Galway County Council or any person external to Galway County Council. The only information that may be shared is the dwelling risk score or risk band which is anonymised and not considered Personal Data.

7. How Will we Secure the Personal Data in this Instance

Any data we collect from an applicant will be stored confidentially and securely as required by the Galway County Council Privacy Statement & Data Protection Policy. Galway County Council is committed to ensuring all accesses to, uses of, and processing of, Galway County Council data is performed in a secure manner.

When we store an applicant's personal data on our systems the data will be stored either on the Galway County Council premises or on secure IT platforms within the EEA which are also subject to European data protection requirements.

During a Home Fire Safety Visit an applicant can ask the officer conducting the visit to show them their personal information that is available to him / her for the purposes of the visit.

8. How Long Will Personal Data be Retained in this Instance

Galway County Council undertakes to retain the personal data supplied by an applicant for no longer than 5 years or as required by legislation. It would be our intention to encourage an applicant to update their Home Fire Safety Checklist on a regular basis, and in so doing any previous checklists will be destroyed. Submission of a new on-line checklist will re- start the 5-year time period. The applicant will have the option to have their information destroyed immediately at any stage.

9. Policy and Privacy Note Review

As this a new on-line venture we commit to reviewing both the policy and privacy note within six months of the receipt of the first on-line Home Fire Safety Checklist from an applicant and documenting the review. Thereafter we will review the policy and privacy note every two years. Each review will take account of any feedback from applicants and any complaints received and result in an updated policy and privacy note.

10. What are the Applicant's Rights and How will They be Informed

The applicant's rights are outlined in the associated Privacy Note. By submitting an online Home Fire Safety Checklist, applicants confirm understanding of the service being provided and how their personal data will be processed by GFRS for this purpose. At the start of the checklist, the applicant is asked to consent to the Privacy Notice otherwise the checklist cannot be completed.

The Privacy Note refers the applicant for further information on how Galway County Council processes Personal Data and their rights, to Galway County Council's Privacy Statement and Data Protection Policy which can be found on our website galway.ie.

or

they may contact Galway County Council 's Data Protection Officer at 091 509290 or dpo@galwaycoco.ie

11. What is the Right of Complaint to the Office of the Data Protection Commissioner

The applicant's right to a complaint if they are not satisfied with the outcome of the response they receive from Galway County Council in relation to their request to the Data Protection Commissioner who may investigate the matter, is also outlined in the associated Privacy Note.

The Data Protection Commissioner's website is www.dataprotection.ie or their Office can be contacted at:

Lo Call Number: 1890 252 231
E-mail: info@dataprotection.ie
Postal Address: Data Protection Commissioner
Canal House
Station Road
Portarlinton,
Co. Laois.
R32 AP23