

Count data protection security agreement:

The key personal information that could be a risk of data breach are **the names, locations and information that could be used to identify rough sleepers**. A breach of this information could risk the security of individuals and would be a violation of GDPR (see attached data protection statement).

1. **Any information pertaining to the date, individuals involved and the operations of the count must be kept strictly confidential by all participants of the count, including on a verbal level.**
2. **Anticipated list sheets:** In terms of data protection – it is crucial that every printed anticipated list with names/locations are accounted for and kept securely within the count team. Any missing sheets should be counted and notified. Any list of names should be sent to Oxford City Council and then destroyed after the count.
3. **Basic assessment forms:** Any new information that will be collected via basic assessment forms, must be numbered and also be individually accounted for by each data collector. Returned, used for recording and then destroyed.
4. **Mobile phones with mapping data:** Any phones containing map data should be ideally locked automatically, and any handsets used need to be accounted for and location data should be wiped after the operation. With new GDPR regulations, the protection of any personal information is paramount and any extraneous use of any personal information should be minimised wherever possible (including storage of the data). Another precaution that could be taken is to anonymise/not include any names on the map coordinates if it is only the locations which are of importance for the count.

I agree to the above security measures:

SIGNED

NAME IN CAPITALS

ORGANISATION

If there are any data breaches where any personal information is exposed or lost during the count, you would need to let us know immediately, to report to our data protection officer (DPO). Send an email to lnguyen@oxford.gov.uk

Data protection statement, Rough Sleeping Count

As holder and owner of the data collected for the count, the local authority, Oxford City Council is the data controller responsible for data protection during the count. It is our responsibility to ensure that the correct procedures are in place to adhere to the Data Protection Act 2018 and GDPR. It is also **the rough sleeping and single homelessness team's sole responsibility to communicate externally any information pertaining to the count.**

Thus, all individuals involved with the count must keep any information pertaining to the operation or any individuals involved are kept completely confidential, even on a verbal basis.

The 8 principles of data protection:

1. Data is fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate
5. Not kept for longer than is necessary
6. Processed in line with your rights
7. Secure
8. Not transferred to other countries without adequate protection

Legal basis for acquiring data:

- Any personal data collected and held will be processed lawfully and appropriately in the **public interest** (activities involved in the reduction and relief of rough sleepers) and the rights of individuals will be upheld (in line with Article 6 of the GDPR).

We collect data for the following purposes:

- Data collected will be part of the official rough sleeping count. Any information collected on the day of the count will be for providing a snapshot figure of the rough sleepers in Oxford in compliance with the Homeless link count methodology, under the requirements of the MHCLG. Data collected will be processed in order to understand the demographics of rough sleepers in Oxford by OCC.
- Personal information stored and collected will be **accurate and up to date** and **kept securely by the outreach team at St. Mungo's and OCC**. No personal information or sensitive information that can result in the identification of an individual shall be reported externally. Demographic information shall be processed in the public interest and for **statistical and monitoring purposes** (in line with Article 89(1) of the GDPR).
- As part of the count, it must be made clear to individuals that they are providing their personal details (name, date of birth) voluntarily, and are not obliged to provide them.

- Any personal and special categories of information may be collected in the interest of understanding the needs of rough sleepers and may be used to help their referral to recovery and relief services.
- In line with Homeless link methodology, if a person refuses to give their personal information, they can still be recorded as sleeping rough, and demographic information including gender, nationality, and ethnicity can still be recorded.
- **The Count Coordinator** should provide copies of this data protection statement on the night of the count, in case it is requested or to assist the person doing the count to answer any questions. The GDPR lists the kinds of information that must be provided.
- A separate data protection agreement is attached to ensure that all participants are aware of and agree to security measures surrounding data protection for the count.