

# Schedule of processing, House in Multiple Occupancy (HMO)

## Schedule One: Processing, Personal Data and Data Subjects

1. Belfast City Council shall comply with written instructions with respect to processing for the 10 Northern Ireland Councils.
  
2. Any such further instructions shall be incorporated into this Schedule.

Description	Details
Subject matter of the processing	<p>The new regulatory approach introduces a system of mandatory licensing for Landlords relating to Houses in Multiple Occupation (HMO).</p> <p>The service delivery is to cluster Councils on a geographical basis with the largest number of HMO's in Belfast, Causeway Coast and Glens and Derry and Strabane.</p> <p>1) Belfast City Council</p> <p>2) Causeway Coast and Glens Borough Council Mid and East Antrim Borough Council Antrim and Newtownabbey Borough Council Lisburn and Castlereagh City Council Ards and North Down Borough Council</p> <p>3) Derry City and Strabane District Council Fermanagh and Omagh District Council Mid Ulster District Council Newry Mourne and Down District Council Armagh, Banbridge and Craigavon Borough Council</p> <p>Belfast City Council (BCC) is a Data Controller for the processing of its own data and will act a Data Processor for the data owned by the 10 other Northern Ireland Councils.</p> <p>BCC will host all the information and personal data required for the licensing and associated enforcement action relating to the processing of data relating to the Houses in Multiple Occupation addressed under the Houses in Multiple Occupation Act (Northern Ireland) 2016.</p>

	<p>The information submitted by those persons required to license will be processed by Belfast City Council in electronic format and to a lesser degree in paper format. The data contained within paper applications will be transferred into electronic format upon receipt. This system will record service requests, inspection, notices and action diary details.</p> <p>Initial licensing will be through a dedicated online secure website managed by Belfast City Council or via the submission of a paper application form. The system is named Tascomi.</p>
Duration of the processing	Commencing 1 <sup>st</sup> April 2019 onwards.
Nature and access of the processing	<p>To develop and use an electronic information system for the licensing of HMO data, which will permit other Councils access to the HMO information relevant to their own Council area.</p> <p>This will involve Belfast City Council collecting / gathering, recording, organising, structuring, maintaining, and facilitating the processing of personal data for itself and on behalf of 10 NI Councils to ensure it meets its compliance obligations with regard to GDPR and the Data Protection Act 2018.</p> <p>Purpose: To provide a service, via a contractual requirement with 10 other NI Councils.</p> <p><b>Access levels</b></p> <p>Access to the data held will be available at three different levels:-</p> <ol style="list-style-type: none"> <li>1) Access by members of the Public</li> <li>2) Read only Access by HMO Officers from each Council</li> <li>3) Access by identified staff from Belfast City Council acting as the Data Processor</li> </ol> <p><b>1) Public Access</b></p> <p>The general public will have a view only access to the following data via a web based search facility hosted by Belfast City Council as the Data Processor:-</p>

	<ul style="list-style-type: none"> <li>• Name of relevant Council</li> <li>• Address of the premises</li> <li>• Number of occupants</li> <li>• Date of license expiry</li> </ul> <p><b>2) Access for HMO Control Officers from each Council</b></p> <p>Three identified staff from each Local Council will have a read only access via a direct log in to the HMO electronic information system. The access is specifically to their own data processed on the system.</p> <ul style="list-style-type: none"> <li>• Name and personal details of the landlord, owner(s) and manager or agent</li> <li>• Address of the premises</li> <li>• Telephone number of the premises</li> <li>• Details of the premises, ie accommodation details, certification and maintenance records</li> <li>• Details of the applicants fit and proper person checks</li> <li>• Enforcement data</li> </ul> <p><b>3) Belfast City Council acting as a Data Processor</b></p> <p>Identified staff of the Data Processor will have access via a direct log in to the HMO electronic information system. The staff acting as a Data Processor will require access to the complete information and personal data processed to permit appropriate administration of the system.</p>
Type of Personal Data	<p>The personal data involved will relate to:-</p> <p>Full name, full contact address, phone numbers and e-mail address, satisfactory management arrangements (ie listing on the insolvency register, bankrupt declaration, availability of sufficient funds to undertake remedial works and to maintain to licensable standards, and details of fit and proper person checks.</p>

Categories of Data Subject	<ul style="list-style-type: none"> <li>• Landlords</li> <li>• Owners</li> <li>• Agents</li> </ul>
Plan for return and destruction of the data once the processing is complete UNLESS requirement under union or member state law to preserve that type of data	<p>Belfast City Council will retain this information in line with a retention and disposal schedule agreed by all NI Councils.</p> <p>Any use of the data outside the remit of the timescales of the programme is not permitted.</p> <p>If data must be deleted, BCC shall delete any copy electronic and manual Personal Data permanently and beyond recovery. This deletion will be confirmed in writing by BCC.</p>
Location of the processing	<p>The processing of HMO data will take place on the premises of BCC with any paper data being held in a locked cabinet within a locked office and electronic data held with appropriate technical and organisational measures that are fully compliant with GDPR.</p> <p>This will ensure there is no unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to the personal data.</p> <p>If special category personal data is processed, it is deserving of additional protection regarding its security, how it is held and who is permitted access.</p> <p>BCC will comply with the security obligation in respect of this specific type of data as per Annex 'A' section 1.5 during the term of the programme to satisfy Belfast City Council.</p> <p>No processing of personal data must take place in a public space or in any area or facility to which the public has open access.</p>

**In signing below, I agree to the terms and conditions outlined in this Data Processing Agreement**

**1. Signed .....**

**Chief Executive of Belfast City Council**

**Date .....**

**2. Signed .....**

**Chief Executive of ..... Council**

**Date .....**