

10th March 2025

BY EMAIL

[REDACTED]

Re: FOI Request, Ref: FOI_16_25

Dear Requester

I refer to the request which you made under the Freedom of Information Act 2014 for records held by this body. Your request sought:

“Under the FOI Act 2014, I am seeking the following:

- A copy of your Article 30 record of processing activities for your housing department.*
- A copy of your Article 30 record of processing activities for your data protection office/department.*

Article 30 of the GDPR places an obligation on controllers and processors to have in place within their organisations a detailed record which accurately identifies the activities the organisation carries out which use personal data.

Where such is not complete or in progress or does not exist, I request records that indicate the progress of such (plans for progression) and (records which demonstrate/confirm/)confirmation that such has been included on an appropriate risk register for your organisation.”

The decision maker in this case was Mr. Michael Drea, Data Protection Officer. The decision has been made to grant your request.

Please note that Wexford County Council are currently reviewing all business section Record of Processing Activities (RoPAs) and the Housing Section are currently updating their RoPA in line with the National Retention Policy for Local Authority Records Housing - approved for use by LGMA May 2019- revised and reissued November 2022.

The records are now available to view at [FOI Responses | Wexford County Council \(wexfordcoco.ie\)](https://www.wexfordcoco.ie/foi-responses).

Schedule of Records

Please see attached a detailed Schedule of Records; this shows the details of the records that were considered to fall under the scope of your request, and it details the decision in relation to each record. The decision can be to grant, part grant or refuse and this is detailed in the Schedule. Where it is decided to part grant a document the exemption sections that are relied upon are quoted.



If you are unhappy with this decision, you may appeal it. In the event that you wish to make such an appeal, you can do so by writing to the Freedom of Information Unit, Wexford County Council, Carricklawn, Wexford or by email to foi@wexfordcoco.ie . Your appeal should include a fee of €30 which can be made payable to Wexford County Council. You should make your appeal within 4 weeks from the date of this notification, where a day is defined as a working day excluding weekends and public holidays. However, the making of a late appeal is permitted in appropriate circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this body.

Should you have any questions regarding the above please contact the FOI Unit at foi@wexfordcoco.ie .

Yours sincerely,

Susan Doran

Susan Doran
FOI Officer,
FOI Unit.

Freedom of Information Schedule of Records - Summary of Decision Making

FOI Request Reference: FOI_16_25

Rec. No.	No. of pages	Date of Record	Brief description of record	Decision Grant Part Grant Refuse	Basis for refusal - Exempt under FOI Act	Other
1	1	18/06/2024	FOI & Data Protection RoPA	Grant		
2	1		Housing ROPA	Grant		

Name of Department / Unit	Purpose of processing [Article 30(1)(b)]	Categories of data subjects [Article 30(1)(c)]	Categories of personal data [Article 30(1)(d)]	Categories of special category personal data [Article 30(1)(f)]	Source of personal data	General description of technical and organisational security measures [Article 30(1)(g) & Article 32]	Retention periods/ [Article 30(1)(g) & Article 32(f)]	Recipients of personal data (if applicable) [Article 30(1)(d)]	Names of third countries or international organisations that Personal Data are transferred to (if applicable) [Article 30(1)(e)]	Safeguards for transfers of personal data to third countries or international organisations (if applicable) [Article 30(1)(f)]	Lawful Basis for processing personal data [Article 6] or Law Enforcement Purposes (LEP) under DPA 2018	Underlying law for processing of personal data and Special Category Data (applicable only if Article 6(1)(c), Article 6(1)(e) and /or Article 9 conditions are met)	Legal basis for processing special category data [Article 9]	Role of Wexford CoCo i.e. Controller/ Joint Controller/ Processor [Article 30(1)(a)]	Details of Joint controller(s) (if applicable) [Article 30(1)(a)]	DPO Contact Details of Data Controller and if applicable Joint Controller [Article 30(1)(a)]
FOI/GDPR	AIE Requests	Client, member of the public	Name, Address, Email Address, Signature		Requester	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain copies of requests including records released for 5 years. Retain sufficient high level description of each request to populate the required (for non-personal requests) disclosure log. Then destroy all other documents including copies of docs released. Periodically offer high level list to archivist.	Internal departments, Commissioner for Environmental Information	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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	European Communities (Access to Information on the Environment) Regulations 2007 to 2014 (S.I. No. 133 of 2007, S.I. No. 662 of 2011 and S.I. No. 615 of 2014) (AIE Regulations)	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Customer Complaints	Client, member of the public	Name, Address, Email Address, Signature, Financial Information, Family Status, Housing Status.		Complainant, internal departments	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain until complaint is resolved then for a further 7 years. Then destroy. Exception being where litigation is underway. In these instances the contact must be retained until all legal case and all appeals are exhausted + 7 years. Then destroy.	Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(a) the data subject has given consent to the processing of his or her personal data.	Not applicable	Article 9(2)(b) processing is necessary for the purposes of carrying out the obligations in the field of employment and social security and social protection law	Controller	Not Applicable	WCC DPO
FOI/GDPR	Data Access Requests	Client, member of the public, Staff member	Name, Address, Email Address, Signature, ID, Financial Information, Family Status, Housing Status,	Trade Union Membership, Health Data	Requester, internal departments	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain records of data subject access requests received and response including documents released for 7 years after response. Then destroy. Exception being cases where litigation in respect of a claim of breach of data rights is ongoing beyond the 7 years. In these cases retain until legal case and all appeals exhausted + further 7 years. A list of requests received with high level details should be retained indefinitely.	Internal departments, Data Protection Commissioner	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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. Regulation (EU) 2016/679 - GDPR	FOI/AIE/Ombudsman's Acts/GDPR	Controller	Not Applicable	WCC DPO
FOI/GDPR	Data Breaches	Client, member of the public	Name, Address, Email Address, Signature, ID, Financial Information, Family Status, Housing Status,	Trade Union Membership, Health Data	Informant, internal departments	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain records of all data breaches (notified or unnotified to the DPC and/or data subject) for a period of 7 years from the time that the breach was discovered. Then destroy. Exception being cases where litigation in respect of a claim of breach of data rights is ongoing beyond the 7 years. In these cases retain until legal case and all appeals exhausted + further 7 years. A list of data breaches received with high level details should be retained indefinitely.	Internal departments, Information Commissioner	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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. Regulation (EU) 2016/679 - GDPR	Article 9(2)(g) processing is necessary for reasons of substantial public interest	Controller	Not Applicable	WCC DPO
FOI/GDPR	FOI Requests	Client, member of the public, Staff member		Trade Union Membership, Health Data	Requester, internal departments	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain copies of requests including records released for 5 years. Retain sufficient high level description of each request to populate the required (for non-personal requests) disclosure log. Then destroy all other documents including copies of docs released. Periodically offer high level list to archivist.	Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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	Fol Act, 2014. Code of Practice for Public Bodies covered by Fol in accordance with S48 of the Fol Act, 2014	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Irish Complaints	Client, member of the public	Name, Address, Email Address, Signature		Complainant	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain until complaint is resolved then for a further 7 years. Then destroy. Exception being where litigation is underway. In these instances the contact must be retained until all legal case and all appeals are exhausted + 7 years. Then destroy.	Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(a) the data subject has given consent to the processing of his or her personal data.	Not applicable	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Ombudsman		Name, Address, Email Address, Signature, ID, Financial Information, Family Status, Housing Status,		Ombudsman, internal departments	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.		Internal departments, Ombudsman	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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	Ombudsman Act, 1980. Ombudsman (Amendment) Act, 2012.	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Outside of FOI Requests	Client, member of the public	Name, Address, Email Address, Signature		Client, member of the public	Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.		Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(a) the data subject has given consent to the processing of his or her	Not applicable	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Protected Disclosures	Client, member of the public, WCC Staff	Name, Address, Email Address, Signature		Client, member of the public, WCC Staff	Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain copies of disclosures made by staff/worker plus investigations and outcomes until matter resolved plus a further 7 years. Then offer anonymised documents to the archivist.	Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(e) 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	Protected Disclosures Act, 2014	Not Applicable	Controller	Not Applicable	WCC DPO
FOI/GDPR	Re-Use of Public Sector Information	Client, member of the public	Name, Address, Email Address, Signature		Requester	Hardcopy files in locked filing cabinet only accessible by FOI Team. Soft copies stored on FOI S Drive only accessible to FOI staff & IT staff when required.	Retain copies of requests including records released for 5 years. Retain sufficient high level description of each request to populate the required (for non-personal requests) disclosure log. Then destroy all other documents including copies of docs released. Periodically offer high level list to archivist.	Internal departments	No transfers outside the European Economic Area	Not Applicable	Article 6(1)(c) processing is necessary for compliance with a legal obligation	Re-use of Public Sector Information Directive 2003/98/EC & 2013/37/EC Statutory Instruments S.I. No 279/2005, S.I. No 103/2009 & S.I. No 525/2015 Circulars 16/15 & 12/16 DPER & Circular 32/05 Finance	Not Applicable	Controller	Not Applicable	WCC DPO

Housing	Maintenance / Improvement of LA Units Traveller Accommodation	Travellers Annual Count (2 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	New Ross MD Housing S Drive/HLO	NULL	NULL	NULL	NULL	Nicknames
Housing	Housing Assessment & Allocation Assessments	Garda Clearance (1 file)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	New Ross MD HLO Office	NULL	NULL	NULL	NULL	Criminal Details
Housing	Housing Assessment & Allocation Tenancy Management	Breach of Tenancy Files (150 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	New Ross MD HLO Office	NULL	NULL	NULL	NULL	Medical
Housing	Housing Supports / Private Rented Sector Social Workers	Area Social Work Files (89 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	New Ross MD Social Work Office N	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector Social Workers	Child Protection (107 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	New Ross MD Social Works Office N	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Notices of Terminations (1 file)	1 Name,Address	0 NULL	Paper Records	99 Archive	Housing Acts	N/a	Enniscorthy MD Housing office	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector HAP	HAP Transfer Notifications (1 file)	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Housing office	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Allocations	Allocations (2 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Housing Office	NULL	NULL	NULL	NULL	NULL
Housing	Maintenance / Improvement of LA Units Estate Management	Resident Association (25 files)	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Incomplete Apps (81 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Special Needs Apps	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector RAS	RAS Transfer (47 files)	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Transfer Apps (8 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	High Support Apps (60 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector Homeless Service	Homeless (10 files)	1 Name,Address,Identification Number/R	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Housing Office & C	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Open Housing Application (859 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Closed Housing Application (106 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	Medical
Housing	Housing Assessment & Allocation Assessments	Traveller Applications (50 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD Canteen	NULL	NULL	NULL	NULL	Medical
Housing	Housing Assessment & Allocation Tenancy Management	Anti-social Behaviour Files (180 files)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD HLO Office	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	Garda Clearance Files (99 files)	1 Name,Address,Phone Number,Identific	1 NULL	Electronic Records, Emails and Paper	99 Archive	Housing Acts	N/a	Enniscorthy MD HLO Office	NULL	NULL	NULL	NULL	NULL
Housing	Housing Rent & Tenant Purchase Rents	Infosys System	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records	99 Archive	"Housing Acts, Shared computer System (Sc	N/a	County Hall Shared Computer Syste	NULL	NULL	NULL	NULL	NULL
Housing	Housing Assessment & Allocation Assessments	IHouse	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records	99 Archive	"Housing Acts, Shared computer System"	N/a	County Hall Shared national Comput	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector HAP	Sugar System (HAP)	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records	99 Archive	"Housing Acts, Shared Computer System (L	N/a	County Hall Shared National Comput	NULL	NULL	NULL	NULL	NULL
Housing	Housing Grants HOP	Integra Grants	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records	99 Archive	"Housing Acts, Shared Computer System"	N/a	County Hall Shared Computer Syste	NULL	NULL	NULL	NULL	NULL
Housing	Housing Rent & Tenant Purchase Rents	Integra Rents	1 Name,Address,Phone Number,Identific	0 NULL	Electronic Records	99 Archive	"Housing Acts, Shared Computer System"	N/a	County Hall Shared Computer Syste	NULL	NULL	NULL	NULL	NULL
Housing	Housing Supports / Private Rented Sector Homeless Service	PASS System	1 Name,Address,Phone Number,Identific	1 Health	Electronic Records	99 Archive	"Housing Acts, Shared System (National)"	N/a	County Hall National Shared Compu	NULL	NULL	NULL	NULL	NULL