



## Privacy Notice for Supported Housing

### Purpose of this document

Manchester Settlement is committed to protecting the privacy and security of your personal information. This privacy notice describes how the Supported Housing service collects and uses personal information about young people who have been referred to or are placed in our supported accommodation service (known collectively as “you” or “your”), in accordance with the Data Protection Act 2018.

Manchester Settlement is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about You. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read and retain this notice, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

### Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to You and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told You about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told You about
6. Kept securely

### The kind of information we hold about you and why

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection, such as information about a person’s beliefs, health or sexual orientation.

We will collect, store, and use the following categories of personal information about you:

- Personal and contact details such as name or preferred name, date of birth or age, gender, contact details, your Manchester City Council ID, NHS and National Insurance numbers
- History of your previous addresses
- Information about your family and family relationships and marital status
- Information about your interests and what you like to do in your spare time
- Information about your education and any skills or qualifications you have
- Information about any jobs you have or have had and any volunteering you do or have done
- Financial information such as your bank details, bank statements or benefits status and details
- If you are still in education, information about your attendance and any details about any issues, your conduct or any disciplinary measures that have been taken against you
- Photos or videos

We use this information to:

- Be able to work out whether our service has the capabilities to support you when you are referred to us and also during the time you are in our supported accommodation
- Manage your participation in our services
- Be able to support/advocate for you when you are applying for benefits, travel, legal and health support or any other support or service you may need
- Help you set up a bank account
- Support your involvement and progress in education, training or employment and manage any issues you are having in your place of education or work
- Once you are eligible, help you apply for the Manchester City Council Manchester Move In service and continue to support/advocate for you through the process
- Add you to our WhatsApp group to keep you up to date with activities and communication
- Be able to recognise you and identify that you should be in the accommodation when we visit
- Help identify you as part of your emergency details if you go missing

In addition, we may use case studies, photos and video clips of you so we can advertise our services and evidence our impact to our funders or for good news stories for local authorities, social media or on display in our office. We will only ever do this with your consent.

### **How we use special categories of personal data**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances.

We will collect, store, and use the following special categories of personal information about you:

- Information about your ethnic origin, religious or other beliefs, sexual orientation,
- Your spoken language(s) or nationality and immigration status
- Health information about you including your physical and mental health, medication, disabilities, special needs or long term conditions and your sex life, sexuality, gender identity and gender reassignment (in so far as they may reveal information about your health)
- Information about your lived experience including that relating to your migration journey
- Information about your political opinions
- Records of conversations with you about your beliefs where we see it as our duty for the prevention of radicalisation or other aspects of the government's Prevent strategy
- Details of any incidents, discriminatory behaviour, crime or hate crime

We use this information:

- To help us understand your support and accommodation needs and to be able to work out whether our service has the capabilities to support you when you are referred to us or at any time you are in our supported accommodation
- To support you with your needs and advocate for you when you are applying for services or support. This might include, for example, needs relating to your mental and physical health, your sexuality and gender identity or your cultural, language and religious needs
- To deliver equality of service, monitor the diversity of participation in our services and as part of our statutory requirements
- To comply with our statutory obligations under the Equality Act 2010
- Where we are under duty to report under the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism and refer any concerns of extremism to the police

- Depending on the crime, where we are under duty to report under the Prevention of Crime Act 1953 (PCA), Criminal Justice Act 1988 (CJA) and Offensive Weapons Act 2019 (OWA)

## **How the law allows us to use your personal data**

We use the personal information we hold about You for a number of different purposes, which we list below. We will only use your personal information when the law under data protection allows us to.

Most commonly, we will use your personal information in the following circumstances:

- Where we need the data to perform the contract we have entered into with you
- Where we need to comply with a legal obligation
- Where we have decided the processing is necessary for our legitimate interests
- Where we use your photos or video clips for display, impact measurement, publication or social media purposes, we will always ask for your consent first

We may process special categories of personal information in the following circumstances:

- Where you have given your explicit consent
- For reasons of substantial public interest, where it is necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment of you with a view to enabling such equality to be promoted or maintained
- For reasons of substantial public interest, where it is necessary for statutory and government purposes
- For reasons of substantial public interest, where it is necessary for the safeguarding of children and individuals at risk
- For reasons of substantial public interest, where it is necessary for preventing or detecting unlawful acts and it is our duty to report

Because we process certain types of special category personal data, the law says that we must also keep an Appropriate Policy Document that provides more information about this and how we comply with the law.

## **How we collect and store personal information**

Your information is securely stored. We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and have a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We collect information from the referral form from your social worker, during our initial interview with you, when you complete sign our move in paperwork or during the course of other activities with you. In some cases, we may receive information from another health or social care professional or from your place of education or work if you are in one.

If the information relates to your immigration status, we may receive information from the lawyer supporting your immigration case.

Information is stored in our Ecco Housing Management system, in our file storage and on paper files held in a secure storage area. Photos may be taken using staff phones and then transferred to our secure file storage and deleted from phones.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Who we share your information with**

We will only share your information when you have given your consent, there is a benefit to you and it contributes to your housing or support needs, or when legally required to do so, including regulatory compliance. We may share your personal information with:

- With other agencies and professionals who may contribute to your support such as GPs, pharmacies, hospitals, teachers, employment support workers, benefit advisors or other health and social care professionals but we will ask for your consent before we do this
- With your leaving care or social worker if there is a need for increased support or so they can be involved in supporting you back into education
- With your leaving care or social worker so they can be aware if your political beliefs have resulted in an arrest or conviction (such as on a demonstration)
- With Local Authorities in order for monitoring reasons (e.g. equal opportunities), to allow them to keep their records up to date and for safeguarding purposes. We may also share data with the Local Authority to support the processing of your housing benefit claim or your application or offer with Manchester Move In to evidence your income and ability to afford a property
- With utility and housing providers if we help you to move to new accommodation
- If we are booking an interpreter for you
- To a education, leisure, sport or residential setting if your health condition is relevant to the activity but we will ask for your consent before we do this
- In an emergency if you are missing, with the police, the City Council or security company to help find you and if you are found to ensure that they have the relevant information to support you (for example your photos and details of your friendship groups)
- There may be circumstances where we are permitted to process your health data where it is essential for someone's life and you are not capable of giving your consent, for example in relation to a medical emergency, where we need to share your health information with medical professionals.

### **Personal data about criminal offences**

We will only process information about criminal offences where we are legally able to do so. Criminal offences data includes any information relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

We will obtain criminal offence data about you in the following circumstances:

- If you give the police our details and they tell us about an incident because they think it is a risk that we need to know about
- If the information has been shared with the local authority and they tell us
- If you tell us directly

We will use your personal information in the following circumstances:

- So we can support you with managing the situation and help you with any emotional or legal support
- To assess any risks to yourself or others and also your ongoing suitability for the service

We process criminal offence data on the basis of 'substantial public interest' and we do this in order to safeguard children and of individuals at risk, to prevent or detect unlawful acts and to comply with legal or regulatory requirements. Where we are legally obliged to, we will share information with the police or local authority for the prevention and detection of crime.

### **How long we will keep your personal data**

Information about you will be kept for 75 years after you leave our accommodation. This follows the Statutory Framework for the Early Years Foundation Stage (England) Records guidance.

### **CCTV**

CCTV is installed at the front door of each property of our supported accommodation. Surveillance is intended for the purposes of keeping you safe in your accommodation and detecting any incidents that take place or behaviours that contravene the rules. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

We process this type of data on the basis of legitimate interest and also 'substantial public interest' and we do this in order to prevent or detect unlawful acts and to comply with legal or regulatory requirements.

We may share information with third parties in the following circumstances:

- Security company representatives so they can identify any further incidents
- The police, if they request, regarding incidents in or around the accommodation, but also if an incident unrelated to the accommodation takes place on the street and images from the CCTV footage may help them with their investigations
- A leaving care worker, as evidence of the severity of the incident if we, for example, need to serve notice on a young person to leave our accommodation

The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. The images/recordings will be stored in the Ring Video Doorbell cloud system and in a secure environment at our offices with a log of access kept. Access will be restricted to authorised personnel.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. This includes footage of images of you from CCTV.
- **Request correction of the personal information** that we hold about You. This enables you to have any incomplete or inaccurate information we hold about You corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Your personal information where You have exercised Your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

- **Request the restriction of processing of your personal information.** This enables you, as is appropriate, to ask us to suspend the processing of personal information about you for example if You want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact The Manchester Settlement Data Protection Officer ( [info@manchestersettlement.org.uk](mailto:info@manchestersettlement.org.uk) ) in writing.

**No fee usually required:** You will not have to pay a fee to access your personal information (or to exercise any of the other rights). If you make a request, we have one month to respond to you. We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties.

**What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact The Manchester Settlement Data Protection Officer ( [info@manchestersettlement.org.uk](mailto:info@manchestersettlement.org.uk) ) Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Where to go if you want more information about your rights or to make a complaint**

For further information about your rights, including the circumstances in which they apply, [see the guidance from the UK Information Commissioner's Office \(ICO\)](#) on individuals' rights under data protection law.

If you would like to exercise a right or make a complaint, please contact:

The Manchester Settlement Data Protection Officer ( [info@manchestersettlement.org.uk](mailto:info@manchestersettlement.org.uk) )

Manchester Settlement

1328-1330, Ashton Old Rd, Openshaw, Manchester, M11 1JG

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

To contact the ICO, telephone their helpline on 0303 123 1113 or go to their [website](#).

Other relevant policies:

- Data Protection Policy
- Appropriate Policy Document