



ABEN Only: Emergency Provision Database Privacy Notice – GMCA

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Purpose

The purpose of this privacy notice is to inform you of your rights about how your data being is being captured on the A Bed Every Night [ABEN Only] Emergency Provision Database.

About the ABEN Only: Emergency Provision Database

ABEN operates as a Greater Manchester wide response providing accommodation and support for people experiencing rough sleeping, or at imminent risk of sleeping rough, who have no statutory accommodation options open to them.

The ABEN Only Database has been created to be used by Local Authorities their commissioned partners and the Greater Manchester Combined Authority [“GMCA”] to help bring together support for people facing homelessness.

It allows these organisations to ensure that you are provided with the right support and accommodation and keeps a record of the work they have done with you. This could include any contact they have had with you, any referrals that have been made or any assessments that they have completed with you whilst you are accessing ABEN accommodation.

Who manages ABEN Only: Emergency Provision Database?

The Greater Manchester Combined Authority has commissioned Real Systems (St Mungo’s) to create this database and to process information on behalf of the Local Authorities, their commissioned partners who support you, and GMCA. Real Systems have experience of developing systems designed to support people facing homelessness.

The Local Authorities and Commissioned Partners are Independent Data Controllers for the personal information they provide on the ABEN Only Database. This means they have responsibility to ensure that your data is used appropriately.

GMCA will receive pseudonymised information for reporting and analysis purposes only for which they will be an Independent Controller. GMCA will not have access to any of the personal data provided by the Local Authorities or their Commissioned Partners.

What information is collected from you?

Information recorded on ABEN Only Database about you, includes:

- Basic personal details such as name, date of birth, and nationality, and some more personal details, such as ethnicity, sexuality, and religious beliefs.
- Records of contacts with support workers, e.g., on the street/in a day centre.



- Your current accommodation situation.
- Information about your support needs, such as whether you have problems with substance misuse or with your physical or mental health.
- Other information that will help to ensure workers understand the services that might help, such as whether you have been in local authority care.

The **lawful basis for processing the personal information** sits with your Local Authorities as the Data Controllers.

The Local Authorities have a statutory duty under Homelessness Reduction Act 2018 to help prevent homelessness, enabling people to stay in their home where possible or support them in finding accommodation where the Local Authority does not have a duty to accommodate.

The legal basis for using the ABEN Only Database to process this information and to share pseudonymised information with the GMCA will be:

- 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.

And for the more sensitive data:

- Article 9 2(g) processing is necessary for reasons of substantial public interest.

Who will my information be shared with?

Personal Information held on ABEN Only Database is *only* accessible to the Local Authorities and their commissioned partners who are supporting you. This means that only those working directly with people accessing services can enter information into the system. These include outreach teams, engagement workers, peer mentors and other specialist services.

When your information is entered into ABEN Only Database, only certain parts can be seen by other Local Authorities and their commissioned partners. This will include your basic personal details and whether you have had contact with a service.

Information from the ABEN Only Database will be used for monitoring and evaluation purposes and sometimes be used in statistics and analysis to help find ways to improve funding and services by the GMCA. No personally identifiable information will be used for these purposes. GMCA does not have access to any personal information on the ABEN Only Database.

Will my data be transferred to another country?



All personal data on the ABEN Only Database will be kept in the UK.

How will my information be kept safe?

GMCA and Real Systems are committed to providing the appropriate levels of security to the information processed and we use reasonable measures to prevent unauthorised access to that information. We are required to demonstrate that our solutions meet the required levels of personal, procedural, policy, data, and technical security. We will only process personal information for the purposes it has been collected or subsequently authorised.

Local Authorities, their commissioned partners and the GMCA using the ABEN Only Database will abide by their own policies and procedures around information governance and security.

All users accessing the ABEN Only Database will undergo sufficient training prior to using the system.

How long will my information be kept?

We know people can return to accessing services after long periods away from them. When this happens, it is helpful for services working with them to be able to look up information about their needs, and what services they previously accessed. For these reasons, your information will be held on ABEN Only Database for only as long as necessary and for no longer than 6 years after you last had anything recorded on the system. At this point any identifying information on your record will be removed.

What are my rights?

Under the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 your rights include:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.



•**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

If you **wish to make a request**, please contact your Local Authority in the first instance.

Who can I contact if you have a question or complaint?

If you have a question or are not satisfied with how your information is being used in relation to the ABEN Only Database, please contact your Local Authorities Data Protection Officer in the first instance. Your Local Authority will then contact Real Systems in relation to any requests or complaints.

If you are **still not satisfied with the response** to any request to exercise your individual rights or you believe that we are not processing your personal data in accordance with the law, you can contact the **Information Commissioner's Office (ICO)**, which is the body that regulates data protection in the UK by:

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
Telephone: 0303 123 1113.

Thank you for taking the time to read this Privacy Notice.