



## **Extra Care Housing Privacy Notice**

This privacy notice is specifically for residents in Gorton Mill House and Dahlia House. Please also refer to our general [Data Protection and Privacy Statement](#). This can be also be found on our website [www.southwayhousing.co.uk](http://www.southwayhousing.co.uk)

### **Who is the Data Controller for this processing?**

Manchester City Council and Southway Housing Trust are the Data Controllers for this type of processing.

### **What is the legal basis for our use of your personal information?**

Most of the personal information we process is provided to us directly by you, under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, the lawful bases we rely on for using your personal information are:

- You gave us your consent when you first applied for the scheme. (GDPR Article 6 (a))
- We have a contractual obligation with you for the core charges (GDPR Article 6 (b))
- We have a vital interest, to protect you in a life or death situation. (GDPR Article 6 (d))
- We need it to perform a public task in order to assess your health and social care needs when you meet the criteria for a care plan under the Care Act. (GDPR Article 6 (e))
- We have legitimate reasons to help us run our Business (GDPR Article 6 (f))

When we collect data about your race, religion or health we also rely on the following lawful basis:

- You gave us your explicit consent when you applied for the scheme (GDPR Article 9 (2) (a))
- We need to collect it for Substantial Public Interest in order to comply with UK legislation, ensure equality of treatment and provide support for individuals with a particular disability or medical condition (GDPR Article 9 (2) (g))

- We are providing you with health and social care support (GDPR Article 9 (2) (h))
- We need to analyse your information (GDPR Article 9 (2) (j))

The legislation we rely on when using your personal information to meet our legal obligations or public tasks includes but is not limited to:

- Equality Act 2005
- Human Rights Act 1998 (Article 8)
- Common Law Duty of Confidentiality
- Local Government Act
- Mental Capacity Act 2005
- Mental Health Act
- Care Act 2014
- Health and Social Care Act 2012
- Health and Social Care Quality and Safety Act 2015 Section 251b

### **What personal information do we hold?**

We only collect and use the minimum amount of personal information required when delivering a service to you.

Wherever possible we use non-identifiable personal information.

The Service may use some or all of the information below:

- Your name, address, date of birth.
- Visual images, personal appearance and behaviour
- National identifiers such as NHS number, National Insurance number etc.
- Information about your family.
- Details about your lifestyle and social circumstances.
- Financial details
- Details about your housing needs.
- Physical or mental health details
- Racial or ethnic origin
- Social Care support outcomes

We get most of this information from you, but we may also get some of this data from:

- Central Government Agencies
- Other Local Authorities
- Health and social care providers



- Police and probation services
- Members of the public (referrer)
- Housing Providers
- Family members

### **How do we use your personal information?**

We use your information to support any application that you have made to reside in an Extra Care Housing scheme. We use your information to determine eligibility for both housing and social care support and we take this information through a formal panel process where the Local Authority, Housing and Care providers are present. We use this information to ensure that your housing / care needs can be met adequately within the scheme that you have applied for.

We use your information for one or more of the following reasons: -

- To support any application that you have made to reside in an Extra Care Housing scheme
- To determine eligibility for both housing and social care support
- To ensure that your housing / care needs are adequately met
- Deliver the service, or handle your query
- To plan and improve the services we offer
- To detect and prevent crime or fraud
- For research, however this would be in anonymised form unless we ask for your consent to use your personal information for this purpose
- To evidence positive outcomes to central government funding agencies

### **Who else might we share your personal information with?**

Sometimes we may need to share your information, but we will only do so where it is necessary or required by law. We will only share the minimum information for each circumstance. We will ensure proper data sharing protocols are in place.

We may sometimes need to share some of your information with:

- Health service providers including NHS Agencies (GPs, Hospitals, Ambulance, Health Visitor, Mental Health Services)
- Care providers, e.g. day care, domiciliary, residential
- Government Agencies (e.g. Department of Health, Department of Work and Pensions)
- Support groups for people with disabilities

- Local Government
- Police
- Fire and rescue services
- Direct Payment Support Services
- Technology assistance providers
- Housing providers
- Your legal team
- Emergency services when appropriate

Your information could be shared with the following housing providers -

- Northwards Housing
- Great Places Housing Group
- Adactus Housing Association
- Anchor Hanover
- Irwell Valley
- Onward
- S4B

It is also shared with the following care providers -

- Medacs
- Human Support Group

The panel is an open forum where all applicants for any Extra Care Housing scheme are discussed with all relevant partners. Operational representatives from the Local Authority will also be present. Your information is taken through the panel process with the aim to offer you a vacancy within one of the schemes. There are occasions where applicants may be offered a vacancy within a scheme that they may not have applied for.

Your information may also be shared with contracted care providers that provide care within our Extra Care Housing Schemes and possibly other housing providers that manage the Extra Care Schemes across Manchester City Council.

The personal information we have collected from you may be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment.

### **Where will we store your information?**

Your information will be stored securely on our network.



### **Will my personal information be accessible outside the UK?**

Should the transfer of personal information outside of the UK become necessary, it will only take place if permitted by law, and then only where there are appropriate safeguards in place to protect the personal information.

### **How long will we keep your personal information?**

We will only use your personal information whilst delivering the service to you and to deal with any questions or complaints that we may receive about this, unless the law requires us to keep it for a longer period. In practice, this means that your information will be kept for 6 years following after you stop receiving support from us and then securely deleted

The data relating to your housing needs or contract will be kept 12 years from the termination of your tenancy. Your information will be held with the housing provider and not Manchester City Council.

If we need to use your information for research or reports, your information will be anonymised and any information taken from notes (hand written or typed) during any consultation sessions will be securely destroyed. The information will continue to be used in a summarised and anonymised form in any research reports or papers that are published. The anonymised information in the papers may be of historic interest and may be held in public archives indefinitely

### **Your rights**

Under data protection law, you have rights including:

- 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.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

To make a request please email us at  
[connect2southway@southwayhousing.co.uk](mailto:connect2southway@southwayhousing.co.uk)

### **Who Can I Complain to If I Am Unhappy About How My Data Is Used?**

You may complain using the Council's complaints procedure available by following the link:

[Information Rights Complaint Procedure](#)

E mail: [informationcompliance@manchester.gov.uk](mailto:informationcompliance@manchester.gov.uk)

or by letter addressed to Information Compliance, Democratic Services Legal Team, Legal Services, P Box 532, Town Hall, Manchester M60 2LA.

Southway has a designated Data Protection Officer who you can contact with enquiries regarding the use of your information:

Matthew Maouati  
Southern Gate,  
729 Princess Road,  
Manchester,  
M20 2LT  
[m.maouati@southwayhousing.co.uk](mailto:m.maouati@southwayhousing.co.uk)

You may also complain at any time to the Independent Information Commissioner about how Manchester City Council has handled your data subject access request (or other request to exercise your data subject right). If you contact the Information Commissioner first, it is likely your complaint will be passed to the Council to give us an opportunity to respond. The Commissioner can be contacted at:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF



Information Line: 01625 545745 Fax: 01625 524510

Web: <http://ico.org.uk>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)