

Young Persons Homeless Prevention Pathfinder Privacy Notice

The Pathfinder is delivered by Greater Manchester Better Outcomes Partnership Limited (GMBOP) and its partners. We are committed to protecting your privacy and being transparent about how we process your personal information. This document describes what data we collect, why we collect it, how we use it, how we keep it secure, and the conditions under which we share it. It outlines your rights under the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018. It also contains important information about your rights as an individual and how to contact us.

What is the Young Persons Homeless Prevention Pathfinder?

Pathfinder provides flexible, choice-based support to young people aged between 18-35 who are at risk of becoming homeless, helping them secure and sustain, safe accommodation, engage in meaningful activity and improve their overall wellbeing. Pathfinder is funded by the Greater Manchester Combined Authority (GMCA).

Who are we?

The Pathfinder service is managed by the Greater Manchester Better Outcomes Partnership Limited (GMBOP), and delivered by its partners:

- [Depaul](#) (Manchester, Bolton and Salford)
- [The Brick](#) (Wigan)
- [Early Break](#) (Oldham and Rochdale)
- [Calico Enterprise Ltd \(part of the Calico Group\)](#) (Trafford, Bury, Stockport and Tameside)

For the purposes of the applicable Data Protection Legislation, Greater Manchester Better Outcomes Partnership Limited (GMBOP), (ICO registration **ZA812847**) are a Data Controller. The delivery partners providing the service are also independent Data Controllers.

In this notice, the term 'we' means Greater Manchester Better Outcomes Partnership Limited (GMBOP), and our Delivery Partners.

The types of information we use

The types of information we may collect and keep on record about you includes:

- Personal details such as your name, address, contact details, age etc.
- Family details e.g., details of dependents or for mediation

- Housing status and history, work history, financial income, Criminal convictions, education, skills and employment
- Wellbeing information e.g., any health information that may be relevant
- Information regarding your lifestyle and social circumstances
- If you provide it, socio-demographic information such as your ethnicity and religion

How and why, we collect and use your information

All organisations must have a valid, lawful reason to process your information. We collect and use your information for the purposes of administering the services we are contracted to deliver on behalf of the Greater Manchester Combined Authority, and to allow us to provide you with the highest quality of service. Key reasons for processing your information are:

- To confirm you are eligible for the programme - we will receive referral information you completed
- To maintain contact with you and allow us to provide the best possible support, advice and guidance whilst on the programme

our information may also be used for:

- Performance monitoring and quality assurance purposes to help us assess the quality and standard of our services to you and to help us meet contractual requirements with our delivery partners and commissioners
- Conducting investigations in response to a complaint or enquiry
- Accounting and record keeping e.g., keeping accounts related to business activities and financial management, including drawing down funding
- Service evaluation - anonymised and pseudonymised data will be shared with the GMCA for the purpose of evaluating the service.

We process information about you based on Articles 6 (1) (c, f, g) the UK GDPR. Further information about the legal basis for processing your data can be found in the table below.

Legal Basis for Processing Data

Type of Organisation information is shared with	The type of information	What we use your information for	The lawful reason that we have identified to process your information
Local Authorities (Independent Controllers)	Referral information: contact details and demographic data, nationality, family details, housing status	We receive this information from Local Authorities so we can identify whether you are eligible for our service. We use the information to contact you so that we can explain the support that is available and invite you to join the programme.	Art 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.
Delivery Partners (Independent Controller)	<p>To avoid you having to repeat yourself and provide the same information over again we store all of your information in one place, allowing GMBOP and its partners to access the data. This includes:</p> <p>Referral data: contact details and demographic data, nationality, family details (for mediation), housing status</p> <p>Programme data: action plans, case notes, individuals needs assessments, employment history, skills, wellbeing information, information on lifestyle and social circumstances, housing information, criminal convictions, financial income, socio-demographic information such as your ethnicity and religion and outcomes data.</p>	Delivery partners are appointed by GMBOP to deliver the Young Persons Homeless Prevention Pathfinder service and provide one to one support to participants.	<p>As Independent Controllers delivery partners will identify their own legal basis for process data, however this is likely to be based on the following:</p> <p>Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the data controller.</p> <p>Article 9 1(g) – processing is necessary for reasons of substantial public interest.</p> <p>or</p> <p>Article 9(1)(a) – Consent to process special category data</p>

Funder - Greater Manchester Combined Authority (Independent Controller)	Limited data: Name and outcomes information such as confirmation of housing and/or employment details. Anonymised data set for the purpose of quality assurance and evaluation.	Provide the funding to support the service. Data is shared for financial audit, performance management and evaluation purposes.	Art 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. Article 6 1 (c) – processing is required by law - Housing Acts, Local Government Act 2000, Local Government Act 1972, Crime & Disorder Act 1998, Localism Act 2011, Care Act 2014, Housing Act 1998, Homeless Reduction Act 2017, Equality Act 2010
Employers and Housing Support Services (with your consent)	Name, contact details, CV, employment history, skills and experience.	Where applicable, and with your consent, we will share your data with employers, for the purpose of finding a job.	Art 6(1)(a) – the data subject has given consent to the processing of his or her data for one or more specific purpose.
Bridges Outcomes Partnerships Ltd (Processor)	Full data set may be accessed by nominated individuals.	Nominated BOP staff will have access to the full Participant data set in order to provide IT, management support and quality assurance services. All data is retained in the UK.	Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the data controller.
In-Form (Processor) IT Case Management System Provider	Full data set may be accessed by nominated individuals.	In order to deliver the services, information needs to be stored and processed on a software system.	Art 6(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the data controller.
Police /Safeguarding - crisis helpline (Independent Controllers)	Limited personal data set provided for the purposes of reporting an incident.	GMBOP and its Delivery Partners is required by law to notify police, or local authorities about any safeguarding concerns.	Art 6(1)(c) - processing is necessary to comply with a legal obligation to which the controller is subject. Art 9(2)(g) - processing is necessary, on the basis of Member State law to safeguard the fundamental rights and the interests of the data subject.

Research and evaluation

In order to ensure that we provide you with the best possible service, we may from time to time conduct research and evaluation. Sometimes we will do this by aggregating and anonymising the data, which means that no one can identify you. On occasion we may ask you to take part in a new piece of research and provide additional information, this will only ever be done with your knowledge and consent.

Sharing your Personal Information

Our aim is to assist you as best as possible during the time that we provide support to you. In order to do this, we may share your information with the following types of organisations:

- **Greater Manchester Combined Authority** - as the commissioner of this service the GMCA require us to share some aggregated anonymised data with them in order for them to administer the contract and monitor our performance. On a sample basis they will also access personal data for the purpose of auditing the contract.
- **Local Authority Housing Teams** – if you have been referred to Pathfinder by your Local Authority Housing Options team, we may need to share with them your current accommodation and address details.
- **Delivery partners** - to avoid you having to repeat yourself and provide the same information over again we store all of your information in one place, allowing GMBOP and its partners to access the data.
- **Employers and Housing Support Services** (with your consent)
- **Management Services** - In order to manage, quality assure, and evaluate the service we also share data with several other organisations, such as our IT provider, programme evaluator and the GMCA.

We **will not** share information that identifies you to any third party, other than those listed above for any reason, unless:

- You ask us to do so
- We ask and you give us specific permission to do so
- We are required to do this by law e.g., by request of a court order
- We are required to share personal information with other organisations, such as the HRMC or law enforcement agencies for the detection and prevention of fraud and other crime
- We are required to share information for financial or audit purposes
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality e.g., to prevent someone from being seriously harmed

We do not transfer your personal information outside the UK.

How long will we keep your personal information?

We will only retain information for as long as contractually and legally necessary. Information is retained according to contractual requirements set by Greater Manchester Authority. Once we are no longer required to keep your information, it will be securely destroyed.

The following table provides you with summary information on how long we may keep your information:

Type of Information	Length of time
Your participant file	Six years following the end of our contracted period (until 2031)
Information relating to fraud or any legal complaints you have made against us	For as long as we reasonably consider that you might legally bring an additional or repeat claim against us or to meet other statutory obligations
Financial information relating to payments we have made to you whilst on the programme	Six years following the end of the tax year

How the law protects you

The law protecting your personal information is the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018. As custodians of your personal information, Greater Manchester Better Outcomes Partnership Limited (GMBOP), are committed to ensuring that your personal data is processed lawfully and respectfully, and by ensuring that we are compliant with the law.

Consent

Where we need your agreement to process your information, for example, to pass your contact details to someone offering a specific service, we will ask for your consent, and will clearly state why your information is needed and who we will share your information with. If you agree to your information being shared, we will record your consent on your record. We will regularly review consent to make sure that the relationships, and purposes for processing, have not changed.

Right to Withdraw Consent

Where you have provided consent for us to share your information with a specific-organisation or individual, you have the right to withdraw your consent at any time. Should you wish to

withdraw your consent, please tell a member of staff or, send a written request to the Data Protection Officer (dpo@bridgesoutcomespartnerships.org), who will process your request.

Keeping your information safe

We are committed to taking all reasonable measures to ensure we maintain the confidentiality and security of personal data for which we are responsible, whether electronically or on paper. We do so to ensure that we are always compliant with data protection laws and information security standards, for example, the UK GDPR and DPA 2018.

GMBOP will ensure that it has appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to 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.

All our staff are required to complete mandatory data protection and information security training to ensure they understand their responsibilities in relation to processing your personal information. Compliance reviews are also undertaken to ensure that data protection laws are being complied with.

Your rights

The UK GDPR and Data Protection Act 2018 grants you certain rights regarding your personal information and the way in which it is processed. This gives you more control over what organisations are doing with your information. These include the right to:

- be informed of why and how we process your data
- request a copy of the information we hold on you
- have any incorrect information updated and put right
- deletion of information, once we have no legal right to hold it
- restrict processing in certain circumstances
- object to unwarranted processing
- ask us to transfer your personal information to another organisation
- object to any automated decision-making including profiling

The right to be informed

We are committed to ensuring that you are always aware of what we are doing with your information and are kept abreast of any changes to the processing of your information. We do so through this Privacy Notice, which is reviewed and updated as and when required.

The right of access

You have the right to ask for the personal information we hold about you. This is known as a Subject Access Request. However, while we will do our best to comply with your request, there may be circumstances where we are unable to fulfil your request, for example, where information we hold has been provided to us in confidence.

When requesting your personal information, you will need to include the following information:

- your full name, address and contact telephone number;
- any information used by the organisation to identify or distinguish you from others of the same name (account numbers, unique ID's etc);
- details of the specific information you require and any relevant dates

The right to rectification

We endeavour to ensure that the information we hold about you is always accurate, however, there may be instances where the information we hold is no longer up to date. You can ask that we rectify any information about you that is incorrect. We would be happy to rectify such information but may need to verify the accuracy of the information first. Please speak to a member of staff so that any inaccuracies can be investigated and corrected where necessary.

The right to erasure

You have the right to request that certain personal information be erased from our systems if you feel that there is an underlying legal issue to us processing your information, or, where you withdraw your consent.

While you may request for your information to be erased, this does not mean that we will necessarily be able to comply with your request, as there may be a legal reason that we are required to keep your information. As such, each request is considered on a case-by-case basis.

The right to restrict processing

You have the right to request us to 'restrict' the processing of your personal information, for example, if you are unsatisfied about the accuracy of the data and we undertake an investigation. We can continue to use your personal data following a request for restriction where we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or the company.

The right to data transfer to another organisation (portability)

You have the right to request us to provide you with a copy of the personal information that you have provided to us, and which we process electronically. The data must be in a machine-readable format that facilitates transmission from controller-to-controller. This allows you further use of the data and enables you to move between service providers without any loss of data.

While you may request data portability, this does not mean that we will be able to comply with your request, each request is therefore considered on a case-by-case basis.

The right to object to how we use personal information

You have the right to object to us processing your personal information for the following reasons:

- Direct marketing,
- Scientific/historical research and statistics,
- Legitimate interests and processing regarding the performance of a public interest or official authority task.

While you may object, this does not mean that we will necessarily be able to comply with your request, as there may be reasons that we are unable to comply, such as other legal obligations. Each request is therefore considered on a case-by-case basis.

The right to object to automated decision making, including profiling

We do not carry out any automated decision making or profiling regarding you or the personal information.

If you have any questions in relation to your rights, or if you would like to receive a copy of your records, correct or request erasure of your personal information, or object to the processing of your personal data, please contact the Data Protection Officer.

To make a request:

- You can tell your key worker who will start the process for you
- You can email dpo@bridgesoutcomespartnerships.org

Please note: Your request will need to include sufficient information to enable us to correctly identify your records (e.g. full name, address, date of birth) otherwise we may need to return to you for verification purposes before we can process your request.

Complaints and Disputes

If you raise a query or complaint in relation to your data rights, we will endeavour to respond as soon as possible. Requests for a copy of your information will be responded to within a one-month period. If you are still not satisfied with how GMBOP is processing your information, you can write to the Information Commissioner's Office at: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Review of this privacy notice

We review this Privacy Notice to ensure we keep you up to date about what we are doing with your personal information and any changes in processing.

If you require this notice in a different format or you need further information or assistance, please contact the Data Protection Officer via the contact details listed above.