

A Bed Every Night (ABEN) Service Privacy Notice

Purpose

The purpose of this privacy notice is to inform you of your rights about how your data being is being captured for the A Bed Every Night (ABEN) service at Tameside and for the ABEN Only Emergency Provision Database used across Greater Manchester.

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.

Tameside, GMCA and Commissioned Partners are Independent Data Controllers for the personal information provided on the ABEN Only Database. This means all organisations 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 Tameside.

What information is collected from you?

Information recorded on ABEN databases 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.

Legal basis for processing

The **lawful basis for processing the personal information** sits with us as the Data Controller.

We 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 we do not have a duty to accommodate.

The legal basis for using the information and to share pseudonymised information with the GMCA will be:

- UK GDPR 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:

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

Who will my information be shared with?

Personal Information held about you is *only* accessible to the Council and our 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.

Your information is also entered into the GMCA ABEN Only Database, only minimal data can be seen by other Local Authorities and their commissioned partners. This will include the following data:-

- Name;
- Surname;
- Date of Birth;
- Gender;
- Number of Previous contacts with any GM ABEN service; and
- Details of the last ABEN service you engaged with.

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 will be kept in the UK.

How will my information be kept safe?

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies which are regularly audited, and the audits are reviewed at senior level.

GMCA and Real Systems who control the ABEN Only Database are committed to providing the appropriate levels of security to the information processed and they use reasonable measures to prevent unauthorised access to that information. They are required to demonstrate that their solutions meet the required levels of personal, procedural, policy, data, and technical security. They 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 clients to be able to look up information about their

needs, and what services they previously accessed. For these reasons, your information will be held for only as long as necessary and for no longer than 3 years after your last contact with the service. At this point any identifying information on your record will be deleted.

What are my rights?

Under the UK 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 use the Council's website <https://www.tameside.gov.uk/dataprotection> or contact the Information Governance Team at information.governance@tameside.gov.uk or by calling 0161 342 8355.

You can contact the council's Data Protection Officer by email at information.governance@tameside.gov.uk or by calling 0161 342 8355.

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 service, please contact the council's Data Protection Officer in the first instance. The council 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.

Website: <https://ico.org.uk/>

Updates

We may update or revise this Privacy Notice at any time so please refer to the version published on our website for the most up to date details on our [Data Protection page](#)