

Wythenshawe Community Housing Group Privacy Notice – COVID-19

This privacy notice has been developed to provide you with information about how we are currently processing personal data safely and securely, in order to support communities and individuals throughout the period we are affected by the coronavirus pandemic (COVID-19).

Wythenshawe Community Housing Group (WCHG) may seek and hold information about you in relation to the unprecedented challenges we all facing during the time of COVID-19.

We are fully committed to protecting your personal data and ensuring that it is processed fairly and lawfully. Information you provide to us and that we hold will be processed in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA) and any subsequent legislation.

We may seek to collect, process and share your personal data in response to the COVID-19 outbreak, which is above and beyond what we would normally do, about tenants, residents, service users, colleagues and the general public to ensure their safety and well-being.

WCHG may be asked to share data to protect and safeguard vulnerable tenants affected by the COVID-19 pandemic. Such information will be limited to what is legal, proportionate and necessary, taking into account the latest guidance issued by the Government, health professionals and Regulators, in order to provide the necessary support to those most vulnerable and in need and also to manage and contain the virus.

What we do with your personal data will be covered by existing powers in current laws and you can find out more information about how we process your information in our Privacy Notice (<https://www.wchg.org.uk/privacy-notice/>). This may change if new legislation is introduced, if that happens we will update this notice.

Before sharing personal data we will weigh up the risks of disclosing the information against the benefits in all our decision making processes, demonstrating that there is a clear and overriding public and individual interest in the disclosure, disclosing the minimum amount of information requested in the safest and securest method of transfer.

Legal Basis

The legal basis for data processing in response to the current situation are covered within Article 6 of the GDPR. The following lawful bases are being relied upon:

- Article 6(1)(c) Legal Obligation – processing is necessary for compliance with a legal obligation to which we are subject;
- Article 6 (1)(d) Vital Interest – the processing is necessary to protect someone's life;

- Article 6(1)(e) Public Task – the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law;
- Article 6(1)(f) Legitimate Interests – the processing is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

Special Category Data

In response to the COVID-19 pandemic it may be necessary for WCHG to collect and share special category personal data which we wouldn't normally process.

Special Category or Sensitive Data include the collection and processing of health data.

It is necessary for WCHG to process and share health data amidst the COVID-19 pandemic for reasons of substantial public interest. The processing will be proportionate to the aim pursued, whilst providing suitable and specific measures to safeguard the fundamental rights and the interests of the data subjects (Article 9, 2, (g)).

The new processing put in place by WCHG meets the conditions set out by paragraphs 6 to 28 of Schedule 1 of the DPA. The processing is necessary under the conditions:

16. Support for individuals with a particular disability or medical condition;
18. Safeguarding of children and individuals at risk.

Retention

WCHG will only keep your information for as long as it necessary, taking into account of Government advice and the on-going risk presented by Coronavirus.

Upon a change in situation or when it is deemed no longer necessary, we will delete the special category data (health data) collected for the purposes of the COVID-19 pandemic.

Further Information

For further information on how we process your data, visit <https://www.wchg.org.uk/privacy-notice/>.