

resident information and photographs privacy statement

1 Purpose of our Privacy Statement

- 1.1 Under the Data Protection Act 2018 (DPA 18) and United Kingdom General Data Protection Regulation (UK GDPR), we are required to explain why we are asking for this information about you, how we intend to use the information you provide and whether we will share this with anyone else.

2 Who are we?

- 2.1 We are Sanctuary Care Limited and its wholly owned subsidiaries, part of Sanctuary Group ("Sanctuary") which is one of the UK's leading providers of housing, care and commercial services. Our address is Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ.

3 Our Data Protection Officer

- 3.1 Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 3.2 If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer by writing to The Data Protection Officer, Sanctuary House, Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ or emailing dataprotection@sanctuary.co.uk

4 Why are we collecting your information?

- 4.1 The information that you provide to us in your contract and care plan during the course of your residency is required by Sanctuary in order to provide you with our basic services under your contractual agreement with us. Without this information, we will not be able to enter into a contract with you.

5 What information are we collecting?

- 5.1 The information which we are collecting about you is the information which you provide to us via your care plan documentation, other care and health-related documents, correspondence relevant to you, your contract with us and from other health, care, medical and financial parties, agencies and organisations.
- 5.2 In order to provide our services we will routinely collect and process information about your health, this is special category data (often also referred to as 'sensitive personal data').
- 5.3 We may collect further special category data as part of your care plan and life history. This information is provided by you on a discretionary basis and other categories of special category data could include: political opinions; religious or philosophical beliefs; trade union membership; sex life or sexual orientation and racial or ethnic origin.

6 What we are going to do with your information

6.1 The information you provide to us will be used for the following purposes:

- It will be stored and used by us in accordance with this privacy statement and also in accordance with your rights under the DPA 18 and UK GDPR;
- It will be collected and used by us fairly and openly for the purpose of providing care and support to you;
- It will allow us to provide services which are tailored to your needs;
- It will be used to improve the services you receive from us; and
- It will enable us to work in partnership with other parties, agencies and organisations to provide you with the best care and support services.
- It will allow us to contact you in the most appropriate way. For example, we can provide literature in large print if you have difficulty reading smaller print; or provide documents in an alternative language if English is not your first language.

6.2 An understanding of your personal situation and individual needs will allow us to provide a tailored care and support service to meet any of your physical, cultural or financial needs.

6.3 Some of the information which we collect will be special categories of personal data ('sensitive personal data'), such as information about your ethnic background or any disability you may have. You need to be aware that we will use this information in order to ensure we deliver services in an appropriate manner as well as to determine how best to improve our services to benefit you.

7 What is the legal basis for using your information?

7.1 In accordance with the data protection laws, we need a 'legal basis' for collecting and using information about you. There are a variety of different legal basis for processing personal data which are set out in the data protection laws.

7.2 The lawful basis on which we rely in order to use the information collected about you for the purposes set out in this notice will be:

7.2.1 Using your information in this way is necessary for us to perform the contract between us and for us to take steps, at your request, prior to entering into the contract.

7.3 The condition on which we rely in order to use the special categories of personal information, your 'sensitive data', is Article 9 2(h) of the UK GDPR as processing is necessary for the purposes of the provision of health or social care. Our basis in Law is Section 2 of Schedule 1, of the DPA 18 as the processing is necessary for health or social care purposes.

8 Sharing your information

Members of Sanctuary Group

8.1 Sanctuary Group is made up of a number of related companies. Your information will only be accessed by other companies in the Group where it is necessary to do so. The obligations which are set out in this notice shall apply to the other members of the Group to the same extent that they apply to us. For more information on which companies make up Sanctuary Group, please go to www.sanctuary.co.uk/about-us

Contractors and sub-contractors

8.2 It may be necessary to share information about you with our contractors and sub-contractors to fulfill the requirements and deliver the services outlined in the contract entered into. This may include sharing information via 3rd party technology or system e.g. sharing information with a GP/Pharmacy via a 3rd party system. The contractors and sub-contractors and any systems are contractually required to ensure that they adhere to the security requirements imposed by the UK GDPR and DPA 2018

8.3 Our contractors and sub-contractors will not share your information with any other parties and will only be able to use the information when completing work on behalf of us.

Regulators and other legal obligations

8.4 We may also be required to share your information with our regulators who are permitted access to this information by law and with other organisations where we have a legal obligation to share the information with them.

Other organisations

8.5 We may from time to time share your information with other organisations, such as:

- The police for the purpose of detection and prevention of crime;
- Organisations and regulators that audit services;
- Local authorities for the purpose of providing appropriate care and support services;
- The NHS and Healthcare professionals for the purpose of providing appropriate care and support services;
- Local Safeguarding teams and the Office of the Public Guardian for the purpose of investigations;
- TV Licencing so they can provide services to you and contact you in respect of related charges;
- Electoral Register so they can provide services to you and contact you in respect of voting rights;
- Digital and/or media providers (e.g. satellite television) so they can provide services to you and contact you in respect of related charges; and
- Organisations with a function of auditing and/or administering public funds for the purpose of detection and prevention of fraud.

Transferring your information abroad

8.6 We will not transfer the information you provide to us outside of the European Economic Area

9 Security of your information

- 9.1 The information that you provide will be stored securely on our systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.
- 9.2 Only relevant members of staff will access the information you provide to us.

10 Can we use your information for any other purposes?

- 10.1 In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

11 Storing your information and deleting it

- 11.1 We will store the personal data which you provide to us for as long as you remain a service user. Once you are no longer a service user of ours, we will review the information which we hold concerning you and determine whether there are any reasons why we need to continue holding that information. For example, if a resident is in arrears when they leave the home, it may be necessary to retain information about them in order to recover those arrears. Once the identified purpose comes to an end, unless there is another identifiable purpose for which it is necessary to hold on to your information, we will delete your information.

12 Your rights

- 12.1 In relation to the information which we hold about you, you are entitled to:
- Ask us for access to the information;
 - Ask us to rectify the information where it is inaccurate or is incomplete;
 - Ask us to erase the information and take steps to ask others who we have shared your information with to also erase it;
 - Ask us to limit what we do with your information;
 - Object to our use of your information and ask us to stop that use;
 - Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation (for example, if you want the information to be sent to another provider).