



Privacy Notice for Supported People, Families, Friends and Advocates

Your Privacy

This Privacy Notice is for supported people in registered care, domiciliary care, supported living service provision, day opportunities and Shared Lives. It is also intended for the families, friends and advocates of supported people with whom we may come in contact or have a need to hold their details.

Your privacy matters to us and we are committed to the highest data privacy standards, confidentiality and adherence with UK GDPR Data and the Protection Act 2018.

To disclose this to you, our Privacy Notice includes the following:

- What data we collect from you.
- How and why we process it.
- Who we share it with and why.

We adopt the core principles of data protection legislation and recognise our obligations under the applicable data protection laws.

Bethphage is registered with the Information Commissioners Office (ICO) Registration No.: Z5087841

Collection of your Personal Data

We collect your personal information via

- Disclosure directly from you
- Referral from other care or health practitioners or local authorities
- From people we are supporting
- From other individuals related to you or who act on your behalf
- From other sources related to the support or care you receive
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Categories and Type of Personal Data Collected and processed.

We may need use some or all of the following information in providing our care and support services or to engage with you.

- Personal contact details, including name, address, telephone number(s), personal email
- Date of Birth, gender
- Emergency contact / Next of Kin and their contact information
- Financial information relating to funding or payment for support services
- Medical, Health and wellbeing information
- Interests and hobbies

- Living standards and capabilities
- Risk assessments
- Criminal convictions
- Equality & Diversity information
- Photos
- CCTV images (at applicable sites)

We treat all personal data as sensitive but acknowledge that we do process special category data, as defined by the law and which we will ensure has particular protection.

Sharing of Personal Data

Access to your personal data by internal staff, is strictly controlled and restricted to only those that need such access.

In some circumstances, such as under a court order or other public agencies , we may be legally obliged to share information.

We may also share information about you with third parties including local authorities that contract our services and external auditors conducting checks on the quality or compliance of our services.

During our engagement with you, we may share your data with other companies who are critical for the effective provision our services. These companies will be viewed as Data Processors.

We may share your personal data with third parties located outside of the EEA and in countries that do not have Data Protection law which provides the equivalent protection to individuals rights as the UK. In these situations, we will ensure that we have in place appropriate safeguards with these third parties to protect your personal data.

Securing and Processing of your Personal Data

The personal data that we process is stored within our own internal IT systems, Offices and those of contracted electronic storage providers.

We have assessed the risks of the processing and storage of your personal data, to ensure we have implemented appropriate technical measures to protect it.

We have also implemented appropriate data protection policies and procedures to ensure all staff maintain the confidentiality of your personal data.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we have a duty to inform you immediately. If the loss or unauthorised access of your data has potential to cause you harm, we will also report this to the Information Commissioners Office, who are responsible for regulating data protection legislation in the UK.

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

Our legal basis for processing your personal data?

Depending on the processing activity, we may rely on one or more of the following lawful basis for processing data under UK GDPR:

- Article 6(1)(a) consent
- Article 6(1)(b) contract
- Article 6(1)(c) legal obligation
- Article 6(1)(d) vital interests
- Article 6(1)(e) public interest
- Article 6(1)(f) legitimate interests

Our processing activities, which are crucial to the provision of our services to you or on behalf of local authorities, will be conducted primarily on the basis of a contractual relationship. This will include information relating to family, friends or advocates where this is needed to provide our services to a supported person.

We may also process your data under our legitimate interests when the processing activities are essential to the provision of services or in the interests of welfare and safety, such as the use of IT systems and CCTV.

We may also seek your consent to collect and process your personal data, such as photographs or other information about you we wish to share for purposes other than those connected to our normal engagement with you.

We may also ask for your consent to keep you informed of changes to our services and fundraising opportunities or events.

Where we process your personal data on the basis of consent, you will always have the option to withdraw this.

Where special category of data is processed, for example health data, the additional basis for processing that we rely on are:

- Article 9(2)(c) necessary to protect the vital interests of a data subject
- Article 9(2)(h) for the provision of health and social care
- Article 9(2)(f) for the establishment, exercise or defense of legal claims.

How long do we keep your personal data for?

We will retain your data for the duration of the relationship between us and to meet our statutory obligations. The retention period for data connected to our services would be 6 Years following our last engagement with you. We may however retain some data for longer if circumstances mean it would be in ours and your interest to do so.

Your rights in relation to personal data

Under UK GDPR, you have the following rights:

- The right to be informed
- The right of access, commonly referred to as subject access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability

- The right to object
- Rights related to automated decision-making including profiling

You can exercise your rights or make any other privacy related enquiries by contacting-
dataprotection@bethphage.co.uk

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

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

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