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# A tree with green hand prints  AI-generated content may be incorrect.

# PRIVACY NOTICE

# For supported people in our care.

# In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform our supported people, their families, and other professionals involved in their care, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former employees and worker

1. **DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

* 1. processing is fair, lawful and transparent
	2. data is collected for specific, explicit, and legitimate purposes
	3. data collected is adequate, relevant and limited to what is necessary for the purposes of processing
	4. data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
	5. data is not kept for longer than is necessary for its given purpose
	6. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
	7. we comply with the relevant GDPR procedures for international transferring of personal data
1. **TYPES OF DATA HELD**

We keep several categories of personal data on our employees in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each supported person and we also hold the data within our computer systems, for example, care assessments and emails between us and other professionals involved in your care.

Specifically, we hold the following types of data, as appropriate to your status:

1. personal details such as name, address, phone numbers
2. name and contact details of your next of kin
3. your photograph
4. your gender, marital status, information of any disability you have or other medical information
5. information on your race and religion for equality monitoring purposes
6. information gathered via the allocation process such as a care assessment.
7. details on your education and employment history etc
8. National Insurance numbers
9. bank account details
10. information relating to your tenancy with Cyllene Residential Ltd, including:
11. Benefits received
12. Bank account details for utilities to be set up and processed where appropriate support is required
13. CCTV footage
14. building access card records
15. IT equipment use including telephones and internet access.
16. **COLLECTING YOUR DATA**

You provide several pieces of data to us directly during the move in period and subsequently upon the start of you receiving support from us.

In some cases, we will collect data about you from third parties, such as healthcare professionals and family.

Personal data is kept in lockable files or within the Company’s IT systems.

1. **LAWFUL BASIS FOR PROCESSING**

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the care plan we have with you, to ensure you receive person-centred support from us.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

|  |  |
| --- | --- |
| Activity requiring your data | Lawful basis |
| Care assessment | Our legitimate interests |
| Detail on medical conditions | Our legitimate interests |
| Making reasonable adjustments for disabilities | Legal obligation |
| Ensuring efficient administration of agreed any risk assessments and support/safety plans to you | Our legitimate interests |
| Effectively monitoring both your conduct and progress against support plan | Our legitimate interests |
| Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained | Our legitimate interests |
| Gaining expert medical opinion when making decisions about your support | Our legitimate interests |
| Dealing with legal claims made against us | Our legitimate interests |
| Preventing fraud | Our legitimate interests |
| Ensuring our administrative and IT systems are secure and robust against unauthorised access | Our legitimate interests |
| Sharing contractual updates and meeting of Key performance indicators with RMBC | Our legitimate interests |

1. **SPECIAL CATEGORIES OF DATA**

Special categories of data are data relating to your:

* 1. health
	2. sex life
	3. sexual orientation
	4. race
	5. ethnic origin
	6. political opinion
	7. religion
	8. trade union membership
	9. genetic and biometric data.

We do not ask for this information but may do from time to time to carry out processing activities using special category data:

* 1. for the purposes of equal opportunities monitoring
	2. to determine reasonable adjustments
	3. for contractual reporting required by RMBC

Most commonly, we will process special categories of data when the following applies:

1. you have given explicit consent to the processing
2. we must process the data in order to carry out our legal obligations
3. we must process data for reasons of substantial public interest
4. you have already made the data public.
5. **FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements to support you in line with your care assessment and agreed support plan. This could lead to us being unable to meet the contractual requirements with RMBC and could mean we are not able to support you as you need, and result in moving out.

1. **CRIMINAL CONVICTION DATA**

We will only collect criminal conviction data where the law permits us and where required to asses the support you require from us.

1. **WHO WE SHARE YOUR DATA WITH**

Employees within our company who are given responsibility for your support will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is shared with third parties for the following reasons: to share information about your support with family, other professionals involved in your care and people in RMBC responsible for the contractual performance of our service.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

1. **PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. All data is locked away or on computer systems with access only for the Director with password protected access.

1. **RETENTION PERIODS**

We only keep your data for as long as we need it for, which will be at least for the duration of your time with us though in some cases we will keep your data for a period after your tenancy has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

All data – for the duration of your tenancy with us and up to 12 months following moving out to enable us to provide information to RMBC to meet our contractual obligations.

1. **AUTOMATED DECISION MAKING**

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

1. **YOUR RIGHTS**

You have the following rights in relation to the personal data we hold on you:

* 1. the right to be informed about the data we hold on you and what we do with it;
	2. the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests;
	3. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
	4. the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
	5. the right to restrict the processing of the data;
	6. the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
	7. the right to object to the inclusion of any information;
	8. the right to regulate any automated decision-making and profiling of personal data.
1. **CONSENT**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

1. **MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint to:

Lifeskills Yorkshire Ltd

Apartment 6, The old Bakery

Barnsley Road

Wath upon Dearne

Rotherham

S63 6QF

Managing Director:

Email: Joleen.mckeith@lifeskillsyorkshire.org

Tel: 07711951793

General enquiries:

Email: staff@lifeskillsyorkshire.org

Tel: 07856082027

Or:

with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.