

WHO “WE” ARE

HC-One's (we, our, us) mission is to become the first-choice care home in every community for People we care for and Colleagues and ensuring we only use your personal information when we need to, in order to deliver care with the kindness that is at the heart of everything we do.

We use your information to provide you with kind, person-centred care and support. This Privacy Statement explains this in more detail.

HC-One Ltd are a limited company registered in England under company number 07712656. We are registered with the Information Commissioners Office under registration number Z2911814. We also hold individual registrations for each company in the HC-One group.

We are regulated by

- the Care Quality Commission (CQC) in England;
- the Care Inspectorate (CI) in Scotland; and the,
- Care Inspectorate Wales (CIW).

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1. WHAT IS PERSONAL DATA?

Personal data is another way to describe personal information. It is any information that is about you that allows you to be identified. Personal data covers simple information such as your name, email and phone number, but it also covers more detailed information such as reference numbers, your location, and other identifiers used by computers.

To find out more about how HC-One uses your personal information please click on the sections below.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The majority of personal information we collect about you, will come from you and your family when you come to live with us, or when your family is choosing a care home. When your family come to visit you, they will need to give us some information so we know they are visiting.

As we get to know more about you, we will collect more information about you so that the kind care we provide, is as person-centred as possible. We will also obtain information from your GP and other health professionals relating to your health.

By law, we have to keep certain personal information so that Inspectors and other third-party organisations can see that we provide you with kind, person-centred care.

HC-One may collect these kinds of personal information about you:

- Basic information, such as name, address, date of birth, phone number and email;
- Financial information, such as how your care is paid for, and any past payments you have made;
- Information about you and your family, such as your next of kin, your partner or spouse, your children and how to get in touch with them;
- Information about your preferences and interests, such as hobbies, likes and dislikes, routines and habits;
- Visual images, such as copies of identification and photographs of you;
- Details of any services you have received from us in the past;
- Information we receive from other sources, such as government departments and your doctor or other healthcare professionals;
- Dates and times of visits your family have made to you;
- Letters we have sent to you or your family about you.

Collecting sensitive information about you

HC-One may also need to collect some information about you which is particularly sensitive. This type of information is called special category personal data. The law

says we can only collect and use this kind of information for very specific legal reasons, such as providing your care and helping other organisations with their functions, such as safeguarding. HC-One will only collect and use this information where it is essential for our work.

Types of special category personal data that HC-One may collect and use:

- Information about your health that is used to provide you with appropriate care and treatment when living in our care homes;
- Information about your views and beliefs;
- Information about your cultural identity;
- Information about your relationships;
- Information that is about who you are.

Collecting information from other people

Sometimes, HC-One may need to collect your data from other people. These will include:

- Government departments;
- National regulators;
- The National Health Service (NHS), your Doctor and healthcare providers;
- Organisations responsible for funding and organising care;
- The Emergency services; or
- HC-One suppliers and local services.

3. HOW DO WE USE INFORMATION ABOUT YOU?

As your care provider, we need to use personal information to deliver kind, person-centred care to you. The information will form part of your care plan, which will sometimes be held on a computer. People will only be allowed to access your information when they are involved in your care, or they are managing care for HC-One.

Your personal information can be used for any of the following purposes:

- Providing and managing your account;
- Supplying our services to you. Your personal details are needed in order for us to enter into a contract with you;
- Providing you with kind care that is person-centred and appropriate to your needs;
- Disclosing information to an appropriate regulator to inform them of certain incidents as required under the law;
- Communicating with you. This may include responding to emails or calls from you;
- Disclosing information to a Coroner, the Police or Safeguarding where they need to conduct a formal investigation

- Supplying you with information by email AND/OR post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us).

Legal reasons for obtaining and using your personal information

HC-One must have a legal reason to collect and use your information. We will use different reasons, depending upon its purpose. This will be explained to you when, or as soon as possible after, we collect your information, or when it is given to us by someone else. The reasons we use are:

- In order to fulfil the contract to provide you with care;
- In order for HC-One to comply with the law and other regulatory requirements;
- In order to protect your life in an emergency;
- In order to act in the public interest;
- In order to fulfil HC-One's accepted interests; or,
- Where we have your consent to use your information.

Where HC-One must use information that is particularly sensitive, HC-One must have additional legal reasons to collect and use your information. These are:

- In order to provide you with kind, person-centred care;
- In order to protect the wider health of everyone, including you;
- In order to protect your life when you cannot give permission;
- In order to act in a significant public interest, such as safeguarding;
- In order to allow fairness in legal matters;
- We have explicit consent to use your information.

4. SHARING YOUR PERSONAL INFORMATION

On occasions, HC-One may be asked to give your personal information or need to collect it from other organisations. These can include:

- Government departments;
- National regulators
- The National Health Service (NHS), your Doctor and healthcare providers;
- Organisations responsible for funding and organising care
- The emergency services;
- HC-One suppliers and local services such as funeral directors.

Any companies we employ who use your personal information are responsible to you through legal agreements with HC-One around Data Protection.

On page 10 we describe the organisations we work with along with links to the Privacy Statements of some of these organisations.

5. DO I HAVE TO CONSENT TO THE USE AND SHARING OF MY INFORMATION?

HC-One will only seek consent/permission to collect, use and share your personal information where you have freedom of choice about how your information is used, such as when you are completing a survey or questionnaire, where we send information about our services (see section 12), or where we would like to use your images on our website, social media or promotional materials.

Where you do not have such freedom over how your information is used, we will use a different legal reason to collect, use and store your information.

If you decide not to provide us with your information, this can make it difficult for us to provide you with kind, person-centred care, that meets your needs.

6. RESPECTING YOUR WISHES AND YOUR INFORMATION RIGHTS

We will normally only share your personal information with your knowledge and where it is needed and when we have a legal reason. Most sharing will be with other professionals and agencies involved with your direct care and treatment, such as a General Practitioner.

If you do not want other organisations that are not involved with your direct care to see your personal information, please tell your Home Manager. We can then record your wishes and third parties will look to respect your wishes where they can.

Please remember that occasionally, HC-One will be required to share certain personal information with a third party by law. For example, we are required by law to tell the care regulators if you suffer an injury. We will always look to provide this information in a way that reduces any risks to your privacy, but this is not always possible.

In England, we will fully comply with the [National Data Opt Out scheme](#). This means where you have expressed a preference to NHS Digital for your data not to be shared for certain research and planning activities, your health data will not be shared.

Further information about your specific data protection rights can be found in the Your Rights Under Data Protection section on page 10.

7. WILL WE SEND YOUR INFORMATION OUTSIDE THE UK?

Most information relating to a person's care is stored within the UK only. These will be in hardcopy, or electronic systems.

However, in some cases, our suppliers may store your personal information outside of the UK. More details on the companies we use can be found in the Organisations We Work With section on page 12.

8. HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

Personal information that we are no longer using is kept securely only for as long as it is needed, or is required by law, before being safely destroyed.

The duration for which your personal information is kept will depend on our reason for collecting it and is defined in HC-One's "Records Retention and Destruction Schedule Procedure", which is available on our website.

9. HOW WILL WE KEEP YOUR INFORMATION SECURE?

Keeping your personal information secure is an important principle of Data Protection, and we take the following steps to protect your information which includes:

- Necessary measures to ensure personal information is protected;
- All electronic data transferred through our systems is encrypted;
- Information is not used for any purpose other than as agreed upon in our terms and conditions;
- Protect your data from loss.

Our systems are checked and audited regularly by experts to ensure they meet all privacy standards, are protected through strong passwords and encryption and comply with our general data protection security and protection policies.

10. DO WE USE CCTV IN OUR HOMES?

HC-One uses CCTV in some of its care homes in order to provide reassurance to the People we care for and their Relatives, protect homes from unlawful intrusion and assist whistleblowers who may have raised concerns. Cameras are only to be used in communal areas, other than in exceptional circumstances. All HC-One homes using CCTV will:

- Consult with everyone living in our homes and their Relatives prior to installation;
- Have considered the impacts and risks of CCTV, which will have been agreed by the Data Protection Officer;
- Have appropriate signs informing all who enter that CCTV is in use in the home;
- Have appropriate security of the CCTV equipment, including encryption to prevent unlawful access to any footage

If you have concerns about the use of CCTV, please speak to the Home Manager in the first instance.

11. SENDING YOU INFORMATION ABOUT OUR SERVICES

Only where you choose to, we may use your personal information to keep you updated about HC-One and our homes. This can be sent to you by email, telephone, text message and post. This will usually be information, news and offers about our services.

We do not want to send you information that you do not want, so if you change your mind, you can tell us to stop sending you information by using the link in our email, or the contact details below.

We will never share or sell your personal information to any third parties for marketing purposes.

12. HC-ONE AND SOCIAL MEDIA

HC-One uses social media to keep Relatives, who aren't always able to visit, up to date with what is going on in our homes. We will never use photographs of People we care for, their families or our staff without seeking permission to do so.

[Twitter - www.twitter.com/hc_one](https://www.twitter.com/hc_one)

[Facebook - www.facebook.com/HCOOneKindcare/](https://www.facebook.com/HCOOneKindcare/)

[LinkedIn - www.linkedin.com/company/hc-one/](https://www.linkedin.com/company/hc-one/)

13. HOW TO CONTACT US

If you need to contact us about anything relating to your personal information, or would like to be provided with a copy, you can speak to us by:

Writing to us:	The Data Protection Officer HC-One Southgate House Archer Street Darlington DL3 6AH
Emailing us:	DataProtectionOfficer@HC-One.co.uk
Telephoning us:	01325 351100

HC-One must by law have a Data Protection Officer (DPO) who ensures that HC-One only uses your data according to the law. Our DPO is **Russell Wynn** and our deputy DPO is **Louise Garrett-Cox**. Should you need to speak to them, please use the details above.

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects how we protect your information.

Any changes will be made available on the General Privacy Policy page on our website.

14. COMPLAINTS

If you have any concerns about the way in which we are using your personal information, please contact our Data Protection Officer using the details above, and we will endeavour to address your concern.

However, you do also have the right to complain about how we treat your personal information to the [Information Commissioner's Office - www.ico.org.uk](http://www.ico.org.uk) ("ICO").

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

casework@ico.org.uk

Telephone: 0303 123 1113
Fax: 01625 524510

YOUR RIGHTS UNDER DATA PROTECTION

Under the law, you have certain rights in relation to your personal information. Where you choose to use your rights, HC-One must:

- Respond to your request within one calendar month (unless extended);
- Respond in a plain and clear language;
- Be sure as to your identity;
- Provide the information free of charge (unless it is repeated or manifestly unfounded);
- Tell you why we are unable to comply with your request;
- Protect the rights of other individuals.

Please click on each section for more information as to each of the rights.

1. THE RIGHT TO KNOW HOW YOUR INFORMATION IS USED

This is the right to know about how and why HC-One is collecting, using and storing personal information about you. This should either take place when we collect your information, or where we collect it from a third party, within one calendar month.

We do not have to tell you that we are using your personal data where it may prejudice investigations, or our obtaining the information is required by law.

2. THE RIGHT TO OBTAIN COPIES OF YOUR INFORMATION

There is a right to ask HC-One to provide copies of your personal information that HC-One might have obtained, be using or have stored about you.

This right should not adversely affect other people. To request copies of your information please email: standards@hc-one.co.uk or contact our Data Protection Officer.

3. THE RIGHT TO CORRECT INACCURATE INFORMATION

There is a right to ask HC-One to correct your personal data where data you believe it is wrong.

Where we cannot legally correct your data, we will look to obtain a supplementary statement from you, explaining why you believe the data is inaccurate or incomplete, and this can be placed alongside the personal information we hold.

4. THE RIGHT TO DELETE YOUR INFORMATION

There is a right to ask HC-One to delete any of your personal data that we have, and is often called the right to be forgotten.

This right does not apply where HC-One are under a legal obligation to retain your information, there is a public interest in retaining your information, we need to retain your information for public health purposes, or we need to retain your information in case of future legal claims. How long we will keep your information for is detailed in our Records Retention and Destruction Schedule Procedure ([link to this](#)).

5. THE RIGHT TO LIMIT THE USE OF YOUR INFORMATION

There is a right to ask HC-One to limit its use of the information. This will only apply where:

- the accuracy of the information is contested;
- the processing is unlawful, but you do not want it to be deleted; or
- HC-One no longer requires the information, but it is necessary to retain for legal claims.

6. ADDITIONAL RIGHTS

There are also additional rights around being able to transfer your information to another organisation and around a system making automated decisions about you.

However, such rights will be limited in terms of HC-One's legal reasons for using the information.

HC-One does not currently make any automated decisions about you.

ORGANISATIONS WE WORK WITH

HC-One cannot deliver kind, person-centred care on our own. We are part of a much wider system to ensure that you are always safe in our care.

In each section below, you can see some of the different organisations that we work with. Where we can, we have provided a link to the organisation's privacy statements.

Please note that HC-One are not responsible for the content of third-party privacy statements. If you have any questions regarding them, please contact the organisation directly.

1. LOCAL GOVERNMENT

Local authorities have certain responsibilities relating to commissioning of care, but also keeping people safe from abuse and neglect. To find your appropriate local authority in England and Wales, please visit www.local.gov.uk/our-support/guidance-and-resources/communications-support/digital-councils/social-media/go-further/a-z-councils-online. For Scottish local authorities please visit www.cosla.gov.uk/councils.

The Local Government and Social Care Ombudsman looks at individual complaints about councils, all adult social care providers (including care homes and home care agencies) and some other organisations providing local public services. www.lgo.org.uk/privacy

2. LAW ENFORCEMENT

We work with Police forces across the United Kingdom to ensure that People we care for stay safe and any incidents are thoroughly investigated. To find the appropriate Police force click www.police.uk/forces, and select whether the Police force is in England, Wales or Scotland.

3. REGULATORS

We work with a number of regulators across the United Kingdom to ensure our care keeps you safe.

Care Quality Commission (England) - www.cqc.org.uk/privacy

Care Inspectorate (Scotland) - www.careinspectorate.com/index.php/core-privacy-notice

Care Inspectorate Wales - www.careinspectorate.wales/privacy-policy

Disclosure & Barring Service (England & Wales) - www.gov.uk/government/publications/dbs-privacy-policies

Social Care Wales - www.socialcare.wales/generic-content/privacy-notice

Disclosure Scotland - www.mygov.scot/privacy/

Health & Safety Executive - www.hse.gov.uk/privacy.htm

Information Commissioners Office - www.ico.org.uk/global/privacy-notice/

Nursing and Midwifery Council - www.nmc.org.uk/contact-us/data-protection/privacy-notice/

4. NHS ORGANISATIONS

We work with NHS organisations who commission and deliver healthcare services that People we care for may use.

NHS England - <https://www.england.nhs.uk/contact-us/privacy-notice/>

Clinical Commissioning Groups (England) - <https://www.england.nhs.uk/ccg-details/>

NHS Scotland - <https://www.scot.nhs.uk/privacy/>

NHS Scotland Health Boards - <https://www.scot.nhs.uk/organisations/>

NHS Wales - <https://www.wales.nhs.uk/privacystatement>

NHS Wales Directory of Services - <http://www.wales.nhs.uk/ourservices/directory>

NHS Digital - <https://digital.nhs.uk/about-nhs-digital/our-work/keeping-patient-data-safe/how-we-look-after-your-health-and-care-information>

5. OUR KEY SUPPLIERS

HC-One uses a number of third-party suppliers in our work. Our main suppliers are listed below according to the countries where your personal data may be held.

United Kingdom Only

L&R Storage, HW Coates Ltd - <https://www.landrstorage.co.uk/privacy-policy-2/>

MED e-care, Boots PLC - <https://www.mede-care.co.uk/>

Eploy, ITS Software Systems Ltd - <https://www.employ.co.uk/information/privacy/>

Atlantic Data Ltd - https://policydocuments.disclosures.co.uk/Privacy_Statement.pdf

Smart Survey - <https://www.smartsurvey.co.uk/privacy-policy>

UK and EEA Only

Access UK Ltd (CareBlox) - <https://www.theaccessgroup.com/privacy-and-legal/>

UK and Globally

Zellis UK Ltd - <https://www.zellis.com/privacy-policy>

Datix Holdings Limited - <https://www.rldatix.com/en-uke/company/rldatix-website-privacy-policy>

Civica UK Limited (Coldharbour) - <https://www.civica.com/en-gb/policies-and-statements/privacy-notice/>

Proactis - <https://www.proactis.com/uk/privacy-policy/>

A²+B LLP - <https://www.seehearspeakup.co.uk/en/privacy-policy>

UK, Australia and United States

Mailchimp, The Rocket Science Group LLC - <https://mailchimp.com/legal/privacy/>

Acteon (Touchstone) - <https://www.acteoncommunication.com/privacy>