



Care Support MK Ltd

Privacy Notice for People Using our Services

About Us

Care Support MK Ltd (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Care Support MK's registered office is at **Artemis House, 4B Bramley Road, Bletchley, Milton Keynes, Bucks, MK1 1PT** and we are a company registered in England and Wales under company number **7901302**. We act as the **data controller/data processor** when processing your data. Our designated Data Protection Officer/Appointed Person is **John Frank-Onyejuba**.

Information That We Collect

Care Support MK processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from is: -

- Name
- Previous Name/s
- Date of Birth
- Home Address
- Personal Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- NHS Number
- Membership of professional organization / trade union
- Bank details
- Family and professionals' contact information
- Special Category Data (*i.e. health/medical information, details about religion, sexuality etc*)
- *We may sometimes process pictorial, recorded and written information for our company newsletter, website updates, and other promotional purposes, such as publishing photos / videos of key events.*

We collect information about people using our services in the below ways: -

Referral and Pre-Assessment documentation, service questionnaires, medication & financial records, Local Authority correspondences.

Information can be passed in paper format, also in email correspondence to/from us.

How We Use Your Personal Data

Care Support MK takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

The purposes and reasons for processing your personal data are detailed below: -

- *We collect service user personal data to carry out assessments to help us make support decisions and recommendations for identified support needs, including changes to support needs over time*
- *We collect and store health & emergency contact details for all of our service users, so we can respond to health needs and emergencies. This includes family, GP and other professionals' contact details linked to the service user*
- *We hold information that we need to refer to (if appropriate) to help service users with their benefit entitlements and financial affairs*
- *We collect and process other records that we are legally obligated to store for periods of time, such as support, medical and financial records.*

Your Rights

You have the right to access any personal information that **Care Support MK** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.



You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

You also have the right to withdraw consent to Care Support MK collecting and / or processing any data that you had previously consented to. To do this, simply send us a letter detailing which consent you wish to withdraw, addressed to:

John Frank-Onyejuba, Data Protection Officer
Care Support MK Ltd
Artemis House
4 B Bramley Road
Bletchley
Milton Keynes
Bucks
MK1 1PT

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Care Support MK** uses **third-parties** to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

The main third parties we share information with include:

Club Group IT Consultants

We use this company to fix and troubleshoot IT issues at head office, to install and maintain office equipment, to synchronise office-based computer, broadband, email and printer systems, to supply and maintain security software to protect company data from malware and ransomware, and to install & set up computer equipment in service users homes where required. To fulfil these responsibilities Club Group may at times need access to electronic software and hardware which contains company-held data, to carry out their contracted work.

Kler Associates Limited Accountancy & Payroll

They process the salary information for all staff in our company. To do this, they need to have information relating to staff names, addresses, marital status, National Insurance numbers, date of birth. This will apply to any service users who also have paid work opportunities with CSMK.



Adult Social Care Access Team (ASCAT), part of Milton Keynes Council

ASCAT receives and processes information relating to safeguarding for our service users. In supplying necessary information, we may need to pass names and addresses, contact telephone numbers, and any other required necessary information, of specific employees, service users, member of their family, etc. This information is supplied only for the purpose of safeguarding and incident-related issues that we as an employer are legally obligated to provide.

Sinclair Accountancy Services

Processing end of year accounts for the company. This includes checking that staff have not been under- or over-paid in their annual salary. Sinclair Accountancy services have access to employees' payroll data for this purpose. This will apply to any service users who also have paid work opportunities with CSMK.

Milton Keynes Council (MKC) Local Authority

MKC commissions care packages to Care Support MK. They hold and process information about us as a company, including service users' personal data as part of referral processes, service user reviews, incidents & safeguarding, reporting statistics and other similar data.

MKC also hold their own data about service users they refer to us, and we may share information and updates with them about our service users and their staff and families as part of our contracted service obligation to MKC.

Care Quality Commission (CQC)

CQC is the national regulatory body who inspects and regulates us as a care provider. Prior to inspection visits, CQC often requests personal data about service users and their families – particularly contact details for interview as part of an upcoming inspection visit. They will want to know that service users have consented for these details to be passed to them by Care Support MK.

This list of third party organisations is not exhaustive – however, if there is an identified need to pass personal data to any other organization, we will only do this in line with our company's legal obligations, otherwise we will ask for your consent before passing any data on to other parties.

From the 25th May 2018, we will add a GDPR section to our company website which will signpost to our third parties' Privacy Policies as we receive them.

Information Security & Technical and Organisational Measures

CSMK takes the privacy and security of individuals and their personal information very seriously and takes every reasonable measure and precaution to protect and secure the personal data that we process.



We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures, including: -

Web Server secure links, such as Secure Sockets Layer (SSL), access controls, password policy, encryptions, pseudonymization practices, restriction to unauthorized access, IT configurations and authentication.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

Care Support MK transfers personal data outside of the EU under limited circumstances, such as when supporting service users on holiday in non-EU countries.

Where we transfer personal information, we utilise the below safeguarding measures and mechanisms to ensure that your personal data is always safe and secure: -

- **Taking minimal and appropriate service user information such as medication sheets, passport, and keeping these secure for the duration of any trip.**

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Care Support MK, however, as this information is required for us to provide you with our services, we will not be able to offer some - or all - of our services without it.

Legitimate Interests

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. In each case, we will carry out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing service user statistics and have identified that our interests are to ensure that our recruitment & retention and service provisions are well-maintained and meet legal obligations.

How Long We Keep Your Data

Care Support MK only retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

We are required under UK tax law to keep employees' basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed. This will apply to any service users who also have paid work opportunities with CSMK.

In general, documentation that will have retention periods applied include:

- Staff recruitment & employment information, correspondences, performance-management data.
- Service records such as handover sheets and other house paperwork, rotas, accident/incident reports, that include service user data.
- Documents relating to service users' care packages, including medication records, daily support records, care plans, risk assessments, family contact details.

Special Categories Data

Owing to the products, services or treatments that we offer, Care Support MK sometimes needs to process sensitive personal information (*known as special category data*) about our service users.

Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

For the people we support, we may need to process special category data about them for the purpose of health & medical referrals, police investigation, transition to new provider, etc.

In such situations we may not be legally obligated to rely on service user consent before processing data. If appropriate, we will explore Mental Capacity Act and Best Interest Assessment routes.

Where we rely on your own consent for processing special category data, we first need your explicit consent through a signed agreement for that process to go ahead.

You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so. We have enclosed a consent sheet with this Privacy Policy for you to read, sign and return to us.



Lodging A Complaint

Care Support MK only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Data Protection Officer.

John Frank-Onyejuba, Data Protection Officer
Care Support MK Ltd
Artemis House
4 B Bramley Road
Bletchley
Milton Keynes
Bucks
MK1 1PT

Tel: 01908 88 90 43 / email: john@caresupportmk.co.uk

If you are not satisfied with the outcome, you can also contact:

Information Commissioners Office
<https://ico.org.uk/concerns/>

Tel: 0303 123 1113