

BARLAVINGTON

M A N O R

Privacy Policy for Representatives, Guardians, Next of Kin, or Family Members of Residents

Introduction

At Barlavington Manor, we respect the privacy of all individuals connected to our residents. This policy explains how we collect, use, store, and protect personal information related to representatives, guardians, next of kin, or family members of our residents in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Who We Are

Barlavington Manor is the data controller responsible for the processing of your personal information when associated with our services. If you have any questions or concerns, please contact our privacy manager:

Address: Burton Park Road, Petworth, West Sussex, GU28 0JS

Email: lisa@barlavingtonmanor.co.uk

Phone: 01798 343309

We are owned and operated by Realmpark Healthcare (Petworth) Limited, a company incorporated in England & Wales with register number 03280007 and its registered address at 110-112 Lancaster Road, New Barnet, Hertfordshire, EN4 8A.

What Information Do We Collect?

We collect the following personal information about representatives, guardians, next of kin, and family members:

- **Basic Information:** Name, address, contact details (phone number, email), and relationship to the resident.
- **Financial Information:** Bank account details (if involved in financial arrangements such as fee payments).
- **Additional Information:** Records of communications or correspondence with us, as well as images from CCTV footage when on site.

We do not process any special category data (e.g., health data) in relation to representatives unless explicitly required by law or exceptional circumstances.

How Do We Collect Your Information?

We collect data from and about you through direct interactions. You may give us your Personal Information, Financial Information and/or Additional Information by completing our pre-admissions form, interacting with our staff about a resident's care, and/or when visiting the Home.

Why Do We Collect Your Information?

We collect and process your personal data for the following purposes:

1. **Communication:** To contact you about the resident's care, emergencies, or important updates.
2. **Financial Administration:** To manage payments, resolve billing queries, and facilitate fee arrangements.
3. **Legal and Regulatory Compliance:** To fulfill our obligations under the law and ensure accountability in our operations.
4. **Record Keeping:** To maintain accurate and up-to-date records of individuals associated with the resident for operational efficiency and compliance.

Lawful Basis for Processing

We process your personal information based on the following legal grounds under the UK GDPR:

- **Performance of a Contract** (Article 6(1)(b)): For managing contractual or financial arrangements related to the resident's care.
- **Legal Obligation** (Article 6(1)(c)): For compliance with legal and regulatory requirements.
- **Legitimate Interests** (Article 6(1)(f)): For ensuring effective communication, financial management, to ensure security and safety of residents, staff and visitors, and operational support connected to the resident's care.

Do We Share Your Information?

We only share your personal information when necessary and with appropriate safeguards. This may include sharing with:

- Financial institutions (to process payments).
- Regulatory or legal authorities (if required by law).
- Third-party suppliers supporting our operations (e.g., IT service providers with appropriate data processing agreements).

We do not sell or share your information for marketing purposes.

Do We Transfer Your Data Outside the UK or EEA?

We do not typically transfer your data outside the UK or EEA. In the event that we do, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

How Do We Protect Your Information?

We use stringent security measures to protect your data, including:

- Encrypted storage of electronic records.
- Controlled access to data by authorized personnel only.
- Regular security audits and staff training.

How Long Do We Keep Your Information?

We retain your personal data only as long as necessary for the purposes for which it was collected or to comply with legal obligations. For example:

- Financial records are retained for a minimum of six years for audit and regulatory purposes.
- Contact details are retained for the duration of the resident's association with our care home and a reasonable period afterward.

Your Rights

You have the following rights under the UK GDPR:

1. **Access:** Request a copy of the personal information we hold about you.
2. **Rectification:** Correct any inaccurate or incomplete information.
3. **Erasure:** Request deletion of data no longer required for its original purpose.
4. **Restriction:** Limit how we process your data in certain circumstances.
5. **Objection:** Object to processing based on our legitimate interests.
6. **Data Portability:** Request a copy of your data in a structured, machine-readable format.

Automated Decisions

We do not use automated decision-making processes involving your personal data.

How to Make a Complaint

If you have concerns about how we handle your data, you can contact our Data Protection Officer. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Website: www.ico.org.uk

Phone: 0303 123 1113

Updates to This Policy

This privacy policy is regularly reviewed and updated to reflect changes in legal or operational practices. The latest version will always be available on our website.

Date Last Updated: Jan 22, 2025