

# BARLAVINGTON

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# MANOR

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## Privacy Policy for Residents

### Introduction

We, at Barlavington Manor, value and respect the privacy of our residents, their families, and all individuals associated with our care services. This policy explains how we collect, use, store, and share personal information in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable laws.

### Who We Are

Barlavington Manor acts as the data controller for all personal information processed in connection with the care and services we provide. You can contact our privacy manager at:

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

**Email:** [lisa@barlavingtonmanor.co.uk](mailto: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 personal and special category data, which may include:

- **Personal Information:** Name, date of birth, address, phone number, email, next of kin details, images captured under CCTV, and financial information.
- **Financial Information:** Bank account details (if involved in financial arrangements such as fee payments).
- **Health Information:** Medical history, care plans, treatment records, medications, and GP details.
- **Additional Information:** Preferences, interests, dietary requirements, and cultural or religious beliefs relevant to care delivery.

### How Do We Collect Your Information?

We use different methods to collect data from and about you including through:

1. **Direct interactions.** You or your Representative(s) may give us your Personal Information, Health Information, Financial Information and/or Additional Information by completing our pre-admissions form, interacting with our staff about your care, and generally using our services.
2. **Third parties.** We may receive personal data about you from various third parties including (but not limited to): your GP, the NHS, other healthcare providers, and emergency services.

### Why Do We Collect Your Information?

We process personal data for the following purposes:

1. **Provision of Care Services:** To assess, plan, and deliver the care services you need, ensuring safety and well-being.
2. **Legal Obligations:** Compliance with health and safety laws, safeguarding, and regulatory requirements.
3. **Contractual Obligations:** Managing your care agreement and associated financial arrangements.
4. **Vital Interests:** Acting in emergencies to protect health or life.
5. **Legitimate Interests:** Enhancing our services, communicating with healthcare professionals, training staff, and maintaining records for accountability.

### Lawful Basis for Processing

We rely on the following legal bases under the UK GDPR:

- **Performance of a Contract** (Article 6(1)(b)): For delivering care services.
- **Legal Obligation** (Article 6(1)(c)): For compliance with health and safety regulations.
- **Vital Interests** (Article 6(1)(d)): For life-critical actions in emergencies.
- **Legitimate Interests** (Article 6(1)(f)): For internal management, ensuring security and safety of residents, staff and visitors, and service improvements.
- **Health or Social Care Purposes** (Article 9(2)(h)): For processing special category data, such as medical information.
- **Explicit Consent** (Article 9(2)(a)): For processing certain data when no other lawful basis applies (e.g., optional religious accommodations).

### Do We Share Your Information?

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

- Healthcare professionals (GPs, hospitals, specialists).
- Regulatory bodies (Care Quality Commission).
- Emergency services, if required.

- Law enforcement, if mandated by law.
- Third-party suppliers supporting care delivery (e.g., IT providers with data processing agreements).

### **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 implement strict security measures, including:

- Encrypted storage and transmission of electronic records.
- Access controls to limit data access to authorized personnel.
- Regular audits and staff training on data protection.

### **How Long Do We Keep Your Information?**

We retain your personal data only as long as necessary to fulfill the purposes for which it was collected and in accordance with statutory requirements. Typically, this is six years after the end of care services.

### **Your Rights**

You have the following rights under the UK GDPR:

1. **Access:** Request a copy of the personal data we hold about you.
2. **Rectification:** Correct any inaccurate or incomplete data.
3. **Erasure:** Request deletion of data, subject to legal obligations.
4. **Restriction:** Limit how your data is processed in certain circumstances.
5. **Objection:** Object to processing based on legitimate interests.
6. **Data Portability:** Request transfer of your data to another provider in a machine-readable format.

### **Automated Decisions**

We do not make automated decisions about your care.

### **How to Make a Complaint**

If you have concerns about our handling of 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](http://www.ico.org.uk)

**Phone:** 0303 123 1113

### **Updates to This Policy**

This policy will be reviewed regularly 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