



**Halcyon
Care Homes**
Part of Anchor

Resident Privacy Notice

All personal information about you will be under the control of Anchor Hanover Group (Anchor) acting as Data Controller and will be processed in line with applicable UK (United Kingdom) data protection legislation including, but not limited to, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (the DPA). Anchor is registered with the Information Commissioner's Office (ICO) and our registration number is Z7000835.

This document tells you about the sort of personal information we collect and how it will be used by us.

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Who does the privacy notice apply to?

This privacy notice tells you what to expect when Anchor collects personal information about you. It applies to applicants for, and residents of, Anchor premises.

The information we process about you will vary depending on the services we provide for you and personal circumstances

In this notice:

- What is personal information?
- How do we collect your personal information?
- How do we use your personal information?
- What information do we ask for, and why?
- The purpose and lawful basis for processing your information
- Your rights in relation to this processing
- Who do we share information with?
- How we secure your data
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What is personal information?

Personal information is information about someone which allows that person to be identified. Examples of personal information that we hold about you include:

- Your full name
- Address and contact details
- Proof of your identity
- Proof of housing eligibility
- References
- Date of birth
- Details of anyone authorised to act on your behalf if applicable
- Next of kin and emergency contact details
- Personal details of all household residents
- Marital (or relationship) details
- National Insurance Number / Tax Identification Number
- Banking or payment card details if you make payments to us
- Benefit and Council tax information
- Your photograph
- Images of you on our CCTV systems

Other personal information may be collected to help us resolve any alleged antisocial behaviour, claims or suspected fraud.

Some personal information is deemed to fall into special categories of personal data. The special categories of data that we hold will be information about:

- Your health
- Race or ethnic origin
- Physical or mental health condition
- Alleged or real offences
- Proceedings for any alleged or real offence
- Sexuality
- Religion, or beliefs

How do we collect your personal information?

- Directly from you
- Someone acting on your behalf
- Social Services, healthcare professionals for the purpose of health and wellbeing support
- The Care Quality Commission
- Emergency Services
- The Police
- The Probation Service
- Support workers
- Social workers
- Credit reference agencies
- CCTV images taken using our own CCTV systems.

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, faxes, online application forms, questionnaires, and text messages.

How do we use your personal information?

Our main legal basis for processing personal data is where it is necessary for the purpose of the legitimate interests pursued by Anchor or by a third party to process your information to manage all aspects of our relationship with you. We will use the information that you provide for several varied reasons and different legal bases may apply depending on the reason for which we have collected or obtained your personal information. The main reasons we process your information are to:

- Respond to your enquiry

- To make sure that everyone who completes an application is treated fairly and equally and that our policies and procedures comply with legislation
- Assess your needs and suitability for the services we provide now and, in the future, – this is necessary for the performance of, or to take steps at your request prior to entering, a contract with you
- Monitor and meet your housing, care, and support requirements – this is necessary for the performance of our contract with you
- To collect any payments, benefits, or grants – this is necessary for the performance of our contract with you and in pursuance of Anchor’s legitimate interests
- To monitor service quality and performance – this is necessary to fulfil our legitimate interest in improving the service that we offer to you and to comply with our legal obligations
- To carry out research such as surveys to help us improve our services to you – this is necessary to fulfil our legitimate interest in improving the service that we offer to you
- To supply information to organisations that audit and regulate us – this is necessary under our legal obligations
- To send you details of our services – this is done to fulfil our legitimate interest in providing you with this information. Should we contact you for marketing purposes we will always give you the opportunity to opt-out of receiving further marketing materials
- For organising and assisting community events
- Providing welfare, benefit, and debt advice
- To assist with adaptations to the properties we manage
- To support you in the event of an emergency

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

Details of what information we collect, and store can be found in Appendix A

The purpose and lawful basis for processing your information

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the UK GDPR:

- Article 6(1)(a) which relates to processing where you have given us your explicit consent for one or more purposes
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest.

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(a) which relies on your explicit consent.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.

- Article 9(2)(f) for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity

National Data Opt-Out (Care)

Anchor reviews all our data processing on an annual basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies. If any data processing falls within scope of the national data opt-out, we use **MESH** to check if any of our residents have opted out of their data being shared for that purpose.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review this on an annual basis for any new processing.

Criminal convictions and offences

We request you provide information on unspent criminal convictions and offences. The lawful basis we rely on to process this data are:

- Article 6(1)(a) which relates to processing where you have given us your explicit consent for one or more purposes
- Article 6(1)(b) for the performance of a contract. In addition, we rely on the processing condition at Schedule 1 part 1 paragraph 1.

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner's Office as the relevant supervisory authority.

More information about your individual rights is detailed in the Section Your rights as a data subject.

Who do we share information with?

Your personal information will be kept secure and confidential. Our employees have restricted access to personal information on a 'need to know' basis. There may be times when we share information about you with other organisations. The information we share with others will be the minimum necessary to enable them to carry out their task. Special categories of personal data are confidential and will only be made available to those who require it. In some circumstances, such as under a court order, we are legally obliged to share information. We may also share information about you with third parties including government agencies, independent regulators, and external auditors. Examples of who we may share your information with include but are not limited to:

- Organisations that will enable the provision or improvement of any housing or care obligations we have towards you, and who provide a service to us such as contractors to undertake repairs
- Local authorities who need your personal information to monitor the quality of our service to you and our obligations to them in relation to the receipt of benefits or grants
- Independent external auditors who need your personal information to monitor compliance and the quality of our service to you
- Police
- Those with whom we are required or permitted to by law to meet our legal obligations or in connection with legal proceedings; or

- Those who require your personal information to protect the vital interests of an individual (in a life-or-death situation)
- Utility companies and council tax offices
- Debt recovery agencies
- Credit reference agencies
- Department of Works and Pensions

The information we share with others will be the minimum necessary to enable them to carry out their task. Anchor will also share information with others where we believe it is in your, or the public's interested to do so, such as to keep residents, employees, or visitors safe, or as required by law. Sensitive personal information will only be made available where it meets the requirements detailed in the section Special Category Data.

We will not transfer your personal information outside of the United Kingdom or European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

We will ensure that anyone we pass personal information to agrees to treat it securely and confidentially and to use or process it solely for the reasons it is provided.

How we secure your data

Anchor operates a robust process for protecting new and existing systems. Your data is protected by multiple layers of security.

Our employees complete mandatory IT (Information Technology) security and data protection training every year. Your information is available to our employees and third parties on a strictly need to know basis.

Anchor is based in the United Kingdom and most of our data is stored within either the United Kingdom or European Union. If we

need to transfer your personal data out of the UK or EEA, we will ensure that appropriate safeguards are in place to protect your data.

How long is your personal data kept for?

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

We usually keep:

- Any application and related documents for accommodation for 7 years following acceptance of the offer of accommodation
- Complaints for 6 years after resolution
- Care plans and related documents for 8 years on cessation of our contract with you, or until transferred to a subsequent provider
- Recordings of telephone calls for 1 year
- CCTV images for 28 days

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.
- Right to judicial review: if Anchor refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

Can I find out the personal data that Anchor holds about me?

Anchor at your request can confirm what information we hold about you and how it is processed. If Anchor does hold personal data about you, you can request the following information:

- The purpose and legal basis for processing
- If the processing is based on the legitimate interests of Anchor or a third party, information about those interests.
- The categories of personal data collected, stored, and processed.
- The recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data

to a third party or international organisation, information about how we ensure this is done securely.

- How long the data will be stored.
- Information about your right to withdraw consent at any time.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence, birth certificate or utility bill (within the last three months).

You can exercise any of your information rights by contacting the Data Protection Team using the details provided in the 'How to contact us' Section. This can be a verbal request, in writing, via email or by completing one of our bespoke forms. You may also ask someone to do this on your behalf. contact us by using the details below. No charge will be made for this service.

Complaints

If you wish to make a complaint about how your personal data is being processed by Anchor or any of our third parties, or how your complaint has been handled, please contact our Data Protection Officer using the details provided in the 'How to contact us' Section.

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on **0303 123 1113** or through the website **www.ico.org.uk**.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you by:

- Writing to the Data Protection Officer at Anchor Hanover Group, 2 Godwin St, Bradford BD1 2ST
- Emailing us at **data.protection@anchor.org.uk**
- Telephoning the Data Protection Team on **01274 026141**

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.

This privacy notice may change from time to time.

Appendix A – Resident Data

What data we collect	What we do with it
Your name, address, and contact details, including email address and telephone number.	<ul style="list-style-type: none"> To process your enquiry To process your application To correspond with you To carry out welfare calls
The name, address, and contact details, including email address and telephone number of anyone authorised to act on your behalf.	<ul style="list-style-type: none"> To process your enquiry To carry out maintenance and repairs To process your application
Personal details of all household residents	To ensure we know who will be living at the premises, this helps us to mitigate the risk of overcrowding and ensures we complete right to rent checks on all adult household members
Next of Kin and Emergency Contacts	To allow us to speak to your preferred contacts on your behalf or in an emergency
Marital (or relationship) details	Equal opportunities monitoring to ensure we are fair
References	To confirm your suitability for one of our properties
Income	We ask for limited financial information.
Work status	Provided to TV licencing for eligible residents for concessionary TV Licence
Date of birth	<ul style="list-style-type: none"> To ensure eligibility for one of our properties Provided to TV licencing for eligible residents for concessionary TV Licence
Passport, national insurance details, images, and other evidence of identity	Confirmation of your identity
Information about your nationality and entitlement to live in the UK	To check your right to live in the UK and enter a contract with you

Banking or payment card details	To deduct monies in accordance with your contract with Anchor
Financial details	To support the management of arrears To offer free, confidential, practical help to all residents.
Health information	To help us support your wellbeing To assist you in an emergency
Information about a criminal record	To confirm your suitability for one of our properties
Photograph	We may capture your photograph to share news of local events for social media platforms and marketing. We will do this with your consent
CCTV	Your image may be captured on an Anchor CCTV system. CCTVs are installed for the purpose of crime prevention and safety
Accidents and incidents	To support you in the event of any accidents and incidents
Equality and diversity monitoring information, including your ethnic origin and date of birth.	Equal opportunities monitoring to ensure we are fair
Voice recordings of phone calls	Calls are recorded by Customer Services for training & monitoring purposes to improve our service and for the purpose of complaint resolution
Website forms	To support you with your enquiries