

TURNER HOME

DATA PRIVACY POLICY

JULY 2023



PRIVACY POLICY

At The Turner Home we are committed to protecting and respecting your privacy. We handle all personal information with great care and have policies in place to protect it.

Your privacy is really important to us and we understand how important it is to you. This privacy policy tells you about the type of information The Turner Home collects and processes, what we do with it, how we keep your information secure, your rights and how to contact us.

We may make changes to this statement from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them. This statement was last changed on 21st July 2023.

About The Turner Home

The Turner Home is the Data Controller for the purposes of the General Data Protection Regulation (GDPR) and any other associated data protection regulation. We are registered with the Information Commissioner's Office (www.ico.org.uk) under registration number Z2422351.

Applicability

This Data Privacy notice is intended for clients and prospective clients only. There is a separate Data Privacy Notice in place for employees and employment applicants.

Information Compliance Responsibilities

The Managing Director is responsible for Information Compliance at The Turner Home and is based on site at Dingle Lane, Liverpool L8 9RN.

Safeguards in place to protect your data

The Turner Home operates a Privacy by Design methodology. This means that we have already considered the safety and security of your data and the potential impact of its loss – before we collect it from you.

We routinely undertake reviews of our policies and procedures to ensure that we remain current and that we are working in the way we should.

Personal data processed by The Turner Home

The Turner Home may collect, store and process personal information about you from a number of sources:

- You may supply the information to us verbally, in writing (letter or email) or via our website;
- We may receive information about you from third parties to enable us to carry out work for you as instructed by or referred from them. For example from primary care providers, hospitals, CCG's;
- Details of your visits to our website may be collected including, but not limited to, traffic data, location data, logs and other communication data and the resources that you access.

The specific information that we will request from you will depend on what you have asked us to do for you. We will always keep requests for information to a minimum.

The Turner Home will only process (use) your personal information where we have a proper reason to do so. In general, this is to allow us to carry out work on your behalf or provide you with information before starting work. The reasons we rely on to use your information are where we:

- have asked for your consent for us to do so;
- have a 'legitimate interest' to do so in order to support our business purposes. Our use will be fair and balanced and never unduly impact on your rights;
- have a contract with you that we can only fulfil by using your personal information, e.g. to carry out a task that you have requested;
- have a legal obligation to use or disclose information about you, e.g. we are required by law to provide information under certain circumstances.

Example of where we might use your information are listed below:

Type of data	Purpose	Legal Basis for processing
Your name and contact details.	To provide you with the services, or information that you have asked for and communicate with you during the work. To keep a record of your relationship with us.	Legitimate interest – this information is necessary for the purposes of satisfying your request. Contractual purposes – this information is necessary to take steps (at your request) prior to entering a contract.
Information obtained from you during the course or our work or services provided to you	To provide you with the services that we have undertaken on your behalf.	Legitimate interest – this information is necessary for the purposes of satisfying your request.
Financial records	Bank Account information	Legitimate interest – this information is necessary to enable payment for services
Transaction data	Details of the payments that you have made	Legitimate interest – this information is necessary for the ongoing operation of our business
The details of the work that we have done or are doing for you	Internal management and resource planning including meetings and business development	Legitimate interest – this is necessary for the ongoing operation of our business
Relevant personal history	Information about your life including social history, health and wellbeing, treatment etc.	Legitimate Interest - To allow us to offer you the best possible care
Treatment and medication notes	Notes about your health, care and medication provision including case assessments	Legitimate Interest - To allow us to offer you the best possible care
Your marketing preferences	So we know how you prefer to be contacted and that you have consented to be contacted.	Legitimate interests – we collect this information to help us comply with the General Data Protection Regulation and

		the laws on electronic marketing.
Information about your visit to our website	To ensure that content from our site is presented in the most effective manner for you and for your computer.	Legitimate interest - ensuring the continued functioning and performance of our website.

Who we share your personal data with

When we are appointed to carry out work for you we are likely to have a requirement to disclose some information to parties outside The Turner Home in the course of carrying out this work. These disclosures are only made when required. Examples of this would be:

Recipient/Category of organisation	Purpose of sharing
Medical services	Hospitals, ambulance services, GP's – where we need to ensure they have the correct information to look after your needs.
Other care services	For example Social Services where we need to deal with them on your behalf
Funding providers	To enable us to deal with organisations that are contributing to or paying for your care
The Health & Safety Executive (HSE)	We are required to report information about safety checks, near misses and accidents.
Auditors and regulators (CQC etc.)	We are required to undergo regular checks as part of our professional regulation
Email marketing services	We may employ email marketing services to send informational material to our newsletter subscribers.
Police	For any matters involving the law
Government services	HMRC, pensions etc. as we are required
Payment processors	To enable us to process your care payments
IT support companies	We may share The Turner Home data with our IT support company so they can investigate software issues.

How long do we keep your personal information?

The Turner Home will only keep your personal information for as long as is necessary to carry out the relevant activity. This information may be held digitally or in paper files.

- We will keep your information whilst we are providing you with the services you require or to administer your relationship with us;
- We will continue to keep your information until the period that you could make a claim against us has elapsed. This is usually 7 years;
- Certain categories of information may have specific retention requirements that we comply with.

Where we are not under a legal obligation to retain your information, we will determine what is necessary by reference to the lawful basis for processing set out above and our legitimate interests.

Automated decision making and profiling

The Turner Home does not use any form of automated decision making or profiling based on the information that we hold about individuals.

Marketing

We will only send marketing information by email and text where you have given us consent to do so. Every email or text message we send will provide an option to opt out of receiving future messages if you wish.

We do not give, sell or exchange your information with other organisations for marketing purposes. You may, at any time, opt out of receiving marketing from The Turner Home by contacting us via post or emailing us.

Cookies

Like most websites www.turnerliverpool.com uses cookies. Cookies are small text files stored on your computer by your browser and are used for many things, such as remembering whether you've visited the site before.

International transfers

The Turner Home does not transfer personal data outside of the United Kingdom for any reasons.

Your rights

The GDPR significantly increases your rights over the personal data The Turner Home holds about you.

You have the following rights over your personal data;

Right of access	You have the right to obtain confirmation from The Turner Home as to whether or not personal data concerning you is being processed, and, where that is the case, access to that personal data.
Right to rectification	You have the right to oblige The Turner Home to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige The Turner Home to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige The Turner Home to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances, but not all) to oblige The Turner Home to provide you with the personal data about you, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to oblige The Turner Home to transmit that data to another controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent which you can exercise by writing to the information compliance manager at address provided above.
Right to object to direct marketing	Where your personal data is processed for direct marketing purposes, you have the right to object at any time to processing of your personal

	data for marketing, which includes profiling to the extent that it is related to such direct marketing.
Rights in relation to automated decision making and profiling	The Turner Home does not perform any automated decision-making based on personal data.

National Data Opt-Out:

Turner Home reviews all of 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 the scope of the National Data Opt-Out we use [MESH](#) to check if any of our service users have opted out of their data being used for this 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 all of the confidential patient information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>.

Additional Informaiton

For more information about any of your rights, please visit:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of your rights concerning your personal data, please contact The Managing Director at the address shown above. If you are not satisfied with the response you receive you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (t) 0303 123 1113 (e) casework@ico.org.uk