

# Privacy Policy (Adults)

## Contents

1. Introduction.....	1
2. The types of personal data CareTech may collect from you.....	1
3. The reasons why CareTech collects personal information. ....	2
4. CareTech's legal basis and purposes for using your personal information .....	3
5. Who will CareTech share your personal information with?.....	5
6. Transferring your personal information internationally .....	5
7. The period for which we will keep your personal information.....	6
8. How we keep your personal information safe and who has access to it .....	6
9. Automated decision making and processing .....	7
10. Your Data Protection Rights .....	7
11. IP addresses and cookies.....	8
12. Changes to CareTech's privacy policy.....	8
13. Contacting our Data Protection Officer .....	8
14. Your right to contact the Information Commissioner.....	9
15. Contact us.....	9
16. Review History .....	9

## 1. Introduction

CareTech is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data that you provide to CareTech (including its subsidiaries), will be processed by CareTech. Your personal data is information which by itself or with other information available to us can be used to identify you, the data subject. By 'processing', we mean any activity that involves using your personal data. This includes collecting it, recording it, storing it, retrieving it, using it, amending it, disclosing it, destroying it, and transferring it to other individuals or organisations outside of the CareTech Group. Please read the following carefully to understand CareTech's views and practices regarding your personal data and how CareTech will treat it.

## 2. The types of personal data CareTech may collect from you

Personal information about individuals is usually provided to CareTech by the individual (Adult, young person, their parent or guardian, foster carer, contractor, patient, customer or visitor). Personal information that individuals provided to other organisations may also be forwarded to CareTech (for example from a local authority social worker when placing an individual with us).

CareTech may collect and process the following personal information:

- Personal details (name, date of birth, email address, home address, telephone number, national identifiers (such as National Insurance Number or passport number or unique pupil number), gender, disability, sexual orientation, biometrics, criminal convictions, racial or ethnic origin, religious or other beliefs).
- Family details (contact details and relationships)
- Financial information (bank details)
- Information about your employment
- Details of any contact we have had with you, such as complaints or incidents
- Safeguarding, special educational needs, physical and mental health
- Education details (school admission, attendance, absences, behaviour, exclusions, certificates, exams or tests records and progress)
- Visual images, personal appearance and behaviour (photographs, CCTV recordings)
- Information relation to offences or alleged offences
- Details of goods and services provided

Personal details about your physical or mental health, biometrics, race, ethnic origin and religion, alleged commission or conviction of criminal offences are considered "sensitive" personal information. We will process any such information only if you have given your explicit consent, it is necessary for a legal reason or you have deliberately made it public.

As part of our statutory duty in services recruiting staff to work with Children and young Adults, including the Keeping Children Safe in Education 2023 guidance, we undertake online checks for all prospective applicants, this includes the screening of social media profiles in order to determine an individual's suitability to work with children and young people. Applications for employment will require your consent to these checks. We can confirm that no other aspects of an applicant's personal profiles will be used to form an opinion of them and that appropriate records will be kept in this regard. Recruitment processes for Adult services will adhere to Schedule 3 of the Health and Social Care Act 2008.

CareTech is an Equal Opportunities Employer and does not discriminate unlawfully against or harass any person on the grounds of any of the protective characteristics.

If you contact CareTech, we may keep a record of that correspondence; details of your visits to CareTech's site, and the resources that you access.

### **3. The reasons why CareTech collects personal information.**

We collect personal information to enable us to fulfil our legitimate business needs, such as:

- provide education and training



- provide residential healthcare, welfare and educational support services
- the provision of fostering for children and young people
- administer school property and library services
- maintain our own accounts and records
- administer the boarding and the organisation of alumni associations and events
- administer shareholders registration and dividends service
- raise funds for our businesses
- support and manage our staff
- advertising and marketing

#### 4. CareTech's legal basis and purposes for using your personal information

We collect and use your personal information in the following situations:

**a) Where our use of your information is necessary for us to perform the contract or contracts that we have with you:**

- These contracts include the terms and conditions of goods or services that individuals agreed with CareTech. For example, we record the personal details of individuals (such as Foster Parent) who care for children or young people on our behalf.
- We also record the names of staff from local authorities which commissioned CareTech to provide services.

Please note that if you do not agree to provide us with the requested information, it may not be possible for us to agree a contract with you or provide services under a contract.

**b) Where our use of your information is for the purposes of our legitimate business needs or the legitimate business needs of third-party contractors who we engaged to deliver services on our behalf.**

For example:

As part of our business needs, we collect visual images, personal appearance and behaviours through CCTV recordings to maintain the security of property and premises and for preventing and investigating crime. This information may be about customers, clients, offenders, suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, security organisations and persons making an enquiry.

- We also keep a record of any communications between us and you, for example emails and phone calls, because we need it to help us fulfil your requests, keep in touch with you, and offer you communications that are relevant to you.



**c) Where we believe it is necessary to use your information to comply with a legal obligation to which we are required to fulfil:**

- Children and Young Adults: We are required by law to track and record the progress of pupils in our schools so that this information can be shared with Ofsted, the government regulator.
- Children and Young Adults: We have a legal duty to record and retain information (gender, age, date of birth) about pupils and share this information with the Department for Education.
- Children and Young Adults: Where the law requires, we have a duty to cooperate with local authorities on arrangements for children and young people with special educational needs.
- Adults funded by NHS or Local authority: Where the law requires, we have a duty to cooperate with local and funding authorities in accordance with contracts.

**d) Where our use of your information is necessary for us to carry out a task in the public interest.**

- We share information with the Police, Local Authority or other agencies where we consider that a child or vulnerable person may be at risk or harm.
- For the safe running of our schools and registered premises, we also monitor movement of visitors entering and leaving our sites.
- We keep record of day-to-day observations of young persons and adults within services or foster homes so that we can manage any risks and track progress.

**e) Where we believe use of your information is necessary in order to protect the vital interests of a person.**

These include:

- Next of kin or specified contacts so that we can contact them in case of an emergency.
- information regarding a person's health needs, including food allergies

**f) where we have your consent.**

We will rely on your consent:

- to use your photographs to promote or market our business
- if you choose to receive marketing information (i.e., subscribing to our e-newsletters via our website, service email updates and general news about CareTech). You will also be given the opportunity to indicate that you no longer wish to receive our direct marketing material.
- To use your biometrics, for example your finger print, for identification purposes.

We will always make it clear where we need your permission to process your personal information. Where we rely on your consent to use your personal information, you have the



right to withdraw that consent at any time, using the same method by which you gave us your consent originally.

## **5. Who will CareTech share your personal information with?**

In fulfilling our business needs, we may share your information for any of the purposes mentioned at section 3 and 4, above. These are: (a) to perform the contract or contracts that we have with you (b) our legitimate business needs (c) to comply with a legal obligation (d) to carry out a task in the public interest (e) to protect vital interests; or (f) where we have your consent.

Specifically, information may be shared with:

- Family and representatives of the person whose personal data we are processing
- Ofsted, Department for Education and local authorities
- Welsh Inspectorate for both care and education
- Care Quality Commission (England)
- Police, courts, tribunals and security organisations
- Contractors who we pay to provide services
- Healthcare professionals, social and welfare organisations
- Staff, students, governors and school board
- Debt collection and tracing agencies
- Financial organisations
- Foster parent
- Education, training and examining bodies
- other members of CareTech

## **6. Transferring your personal information internationally**

It may sometimes be necessary to transfer personal information overseas (outside of the United Kingdom). When this is needed information is only shared within the European Economic Area (EEA) or to a country that has been assessed as providing 'adequate' protection for people's rights and freedoms regarding their personal data as per Article 45 GDPR. Any transfers made will be in full compliance with all aspects of the General Data Protection Regulations and Data Protection Act 2018.

## 7. The period for which we will keep your personal information

We will only retain your personal information for as long as it is required in relation to the purposes for which it was originally obtained or based on our legal and regulatory requirements. CareTech has a records management procedure that details how long we will retain personal data. For example, the law requires us to keep information about the protection of children for 75 years.

How long personal information will be retained for depends on the type of information it is and what it is being used for.

We keep your personal information in line with set periods calculated using the following criteria:

- How long you have been a customer with us, the types of products or services you have with us, and when you will stop being our customer.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any time limits for making a claim.
- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.
- Any relevant proceedings that apply

For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (although we will keep a record of your preference not to be emailed).

We will review our data retention periods for personal information on a regular basis. We also continually review the information that we hold, and delete anything that is no longer required.

## 8. How we keep your personal information safe and who has access to it

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, unauthorised access, destruction or damage.

Personal information held by us electronically are stored on secure computer systems and we control who has access to them. Our staff receive data protection training and we have data protection policies and procedures in place which teams are required to adhere to.

Where we use external companies to collect or process personal data on our behalf, we undertake detailed checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or have access to.

CareTech's site may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that CareTech does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9. Automated decision making and processing

Automated decision making involves processing your personal information without human intervention to evaluate your personal situation, such as your personal preferences, interests or behaviour. For instances, in relation to a decision on whether to admit or exclude a pupil from one of our schools. All such decisions regarding your personal information are made by one of our employees. Decisions are therefore not made solely by automated devices.

## 10. Your Data Protection Rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Object to automated decision-making including profiling**, that is not to be subject of any automated decision-making by us using your personal information or profiling of you.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This

enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

- **Withdraw consent.** In those circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please email the Data Protection Officer: [data.protection@caretech-uk.com](mailto:data.protection@caretech-uk.com) or by post to: CareTech Community Services Ltd, Metropolitan House, 3 Darkes Lane, Potters Bar, Hertfordshire, EN6 1AG.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 11. IP addresses and cookies

CareTech may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. CareTech may also obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help CareTech to improve CareTech's site and to deliver a better and more personalised service. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of CareTech's site. Unless you have adjusted your browser setting so that it will refuse cookies, CareTech's system will issue cookies when you log on to CareTech's site.

## 12. Changes to CareTech's privacy policy

Any changes CareTech may make to CareTech's privacy policy in the future will be posted on this page.

## 13. Contacting our Data Protection Officer

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this policy. You can make a complaint or raise a concern about how we process your personal information by contacting our Data Protection Officer: [data.protection@caretech-uk.com](mailto:data.protection@caretech-uk.com).



## 14. Your right to contact the Information Commissioner

If you are not happy with how we have handled your complaint, or you believe that we have not handled your personal information in keeping with the law, you have the right to complain to the Information Commissioner's Office (ICO), which oversees the protection of personal information in the United Kingdom. Alternatively, you may choose to contact either the ICO directly about your complaint, regardless of whether you have raised it with us first.

## 15. Contact us

Questions, comments and requests regarding this privacy policy are welcomed including enquiries concerning your permission and privacy rights, and should be addressed to: CareTech Community Services Ltd, Parkview, 82 Oxford Road, Uxbridge, UB8 1UX.

## 16. Review History

Policy Author / Reviewer	Russell Edge
Approval Date	July 2025
Version No	6
Policy Level	Group
Staff Groups Affected	All Staff and Customers