



## **Sentinel Homecare Limited**

### **Privacy Notice**

#### **Who we are?**

We are a domiciliary homecare company. We provide non-medical homecare services and companion services to the community of Bradford, West Yorkshire. We employ over 60 staff members covering a range of expertise in the home care field.

#### **What is a privacy notice?**

A Privacy Notice is a statement by Sentinel Homecare Limited to service users, visitors, carers, the public and staff that describes how we collect, use, retain and disclose personal information which we hold. It is sometimes also referred to as a Privacy Statement, Fair Processing Statement or Privacy Policy. This privacy notice is part of our commitment to ensure that we process your personal information/data fairly and lawfully.

#### **Why issue a privacy notice?**

Sentinel Homecare Limited recognises the importance of protecting personal and confidential information in all that we do and takes care to meet its legal and regulatory duties. This notice is one of the ways in which we can demonstrate our commitment to our values and being transparent and open, and commitment to our values of Respecting Diversity, Acting with Integrity, Demonstrating Compassion, Striving for Excellence and Listening and Supporting Others.

This notice also explains what rights you have to control how we use your information.

#### **What are we governed by?**

The key pieces of legislation/guidance we are governed by are:

- General Data Protection Regulations 2018
- Human Rights Act 1998 (Article 8)
- Access to Health Records Act 1990
- Freedom of Information Act 2000
- Health and Social Care Act 2012, 2015
- Public Records Act 1958
- Copyright Design and Patents Act 1988
- The Re-Use of Public Sector Information Regulations 2015
- The Environmental Information Regulations 2004
- Computer Misuse Act 1990

The Common Law Duty of Confidentiality  
The Care Record Guarantee for England  
The Social Care Record Guarantee for England  
International Organisation for Standardisation (ISO) – Information Security Management Standards (ISMS)  
Information Security Management – NHS Code of Practice  
Records Management – Code of Practice for Health and Social Care 2016  
Accessible Information Standards (AIS)

## **Who are we governed by?**

Commissioner's Office - <https://ico.org.uk/>  
Care Quality Commission - <http://www.cqc.org.uk/>

Our business consultants and third parties from whom we rely upon for information example doctors, nurses, healthcare professionals and registered support staff are also regulated and governed by professional bodies including numerous royal colleges.

## **Why and how we collect information**

We may ask for or hold personal confidential information about you which will be used to support delivery of appropriate care and treatment. This is to support the provision of high quality care.

These records may include:

- ☐ Basic details, such as name, address, date of birth, next of kin.
- ☐ Contact we have had, such as appointments and home visits.
- ☐ Details and records of treatment and care, including notes and reports about your health
- ☐ Information from people who care for you and know you well, such as health professionals and relatives.
- ☐ Information from Social Services/Local Authorities/NHS

It may also include personal sensitive information such as sexuality, race, your religion or beliefs, and whether you have a disability, allergies or health conditions. It is important for us to have a complete picture, as this information assists staff involved in your care to deliver and provide improved care, deliver appropriate treatment and care plans, to meet your needs.

Information is collected in a number of ways, via your healthcare professional, adult social services, referral details from your GP or directly given by you

## **How we use information**

- ☐ To help inform decisions that we make about your care.
- ☐ To ensure that your treatment is safe and effective.
- ☐ To work effectively with other organisations who may be involved in your care.
- ☐ To review care provided to ensure it is of the highest standard possible.

## **National Data Opt-Out**

The national data opt-out gives everyone the ability to stop health and adult social care organisations from sharing their confidential patient information for reasons other than providing their individual care and treatment. The national data opt-out only applies where the data processing relies upon Regulation 5 of the Control of Patient Information Regulations 2002.

*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/>.*

There is huge potential to use your information to deliver care and improve health and care services across the NHS and adult social care. The information can be used to help:

- ☐ Improve individual care.
- ☐ Understand more about disease risks and causes.
- ☐ Improve diagnosis.
- ☐ Develop new treatments and prevent disease.
- ☐ Plan services.
- ☐ Improve patient safety.
- ☐ Evaluate Government, NHS and Adult Social Care policy.

When using information to inform future services and provision, non-identifiable information will be used.

It helps you because;

- ☐ Accurate and up-to-date information assists us in providing you with the best possible care.
- ☐ If you see another healthcare professional, specialist or another part of the NHS, they can readily access the information they need to provide you with the best possible care.

## **How long for is information retained and kept safe?**

Information is retained in secure electronic and paper records and access is restricted to only those who need to know. It is important that information is kept safe and secure, to protect your confidentiality. There are a number of ways in which your privacy is shielded; by using secure back up servers only, secure alarmed buildings with secure locked offices and filing cabinets, using an annual review process, adhering to strict contractual conditions and ensuring strict sharing or processing agreements are in place where needed.

The GDPR 2018 regulates the processing of personal information. Strict principles govern our use of information and our duty to ensure it is kept safe and secure.

Technology allows us to protect information in a number of ways, in the main by restricting access. Our guiding principle is that we are holding your information in strict confidence.

Your files (Staff and Client) will be held for 5 years from date of last entry unless local commissioners require longer periods specific to their contract

### **How do we keep information confidential?**

Everyone working for Sentinel Homecare Limited is subject to the Common Law Duty of Confidentiality and the GDPR 2018. Information provided in confidence will only be used for the purposes to which you consent to, unless there are other circumstances covered by the law.

Under the GDPR 2018 all staff are required to protect information, inform you of how your information will be used and allow you to decide if and how your information can be shared. This will be noted in your records.

All staff are required to undertake annual training in data protection, confidentiality, IT/cyber security, with additional training for specialist, such as healthcare records, data protection officers and IT staff.

### **Who will the information be shared with?**

To provide best care possible, sometimes we will need to share information about you with others. We may share your information with a range of Health and Social Care organisations and regulatory bodies. You may be contacted by any one of these organisations for a specific reason; they will have a duty to tell you why they have contacted you. Information sharing is governed by specific rules and law.

The Care Quality Commission (CQC) relies on its legal powers to access information rather than consent, therefore may use its powers to access your records even in cases where objections have been raised. More details on how the CQC ensures compliance with data protection law (including GDPR) and to access their privacy statement please go to the website [www.cqc.org.uk/about-us/our-policies/privacy-statement](http://www.cqc.org.uk/about-us/our-policies/privacy-statement).

### **Sharing with non-NHS organisations**

For your benefit, we may also need to share information from your records with non-NHS organisations, from whom you are also receiving care, such as social services or private healthcare organisations. However, we will not disclose any health information to third parties without your explicit consent, unless there are exceptional circumstances, such as when the health or safety of others is at risk or where the law requires the disclosure of information.

We may also be asked to share basic information about you, such as your name and parts of your address, which does not include sensitive information from your health records. Generally, we would only do this to assist them to carry out their statutory duties (such as usages of healthcare services, public health or national audits). In these circumstances, where it is not practical to obtain your explicit consent, we are informing you through this notice, which is referred to as a Privacy Notice, under the GDPR 2018.

Where patient information is shared with other non-NHS organisations, an information sharing agreement is drawn up to ensure information is shared in a way that complies with relevant legislation.

Non-NHS organisations may include, but are not restricted to: social services, education services, local authorities, the police, voluntary sector providers and private sector providers.

### **Your right to withdraw consent for us to share your personal information**

You have the right to refuse/withdraw consent to information sharing at any time. We will fully explain the possible consequences to you, which could include delays in you receiving care.

### **NHS Choosing to opt out**

The National Data Opt-out Programme (NDOP) is a product of the data security review by the National Data Guardian on how individuals' data is used and shared by healthcare organisations. It is part of a vision to improve peoples trust and confidence in how data is looked after by the health and social care system. The National Opt-out ties in with other work on data security and ensuring data is only used for the benefit of people's health and care.

The opt-out allows patients to directly express a preference to opt out of using their personal identifiable information for;

Health Planning – e.g. data used to improve delivery of services

Health Research – e.g. finding ways to improve treatments

NDOP provides a means for people who are registered with a GP in England to make an informed choice and have control how their data is shared.

Patients who decide they do not want their personally identifiable data used for planning and research purposes will be able to make their choice online. The NHS will provide a non-digital alternative for patients who can't or don't want to use an online system.

### **Your right to have your personal data deleted or rectified**

The right to erasure which is also known as the right to be forgotten will enable you to request a deletion or removal of your own personal data, (please contact the Data Protection Officer) where there is no compelling reason for its continuous processing. It's important to know the right to be forgotten is not an absolute right. Please see [www.ico.gov.uk/right-to-erasure](http://www.ico.gov.uk/right-to-erasure)

## **Contacting us about your information**

Each organisation has a senior person responsible for protecting the confidentiality of your information and enabling appropriate sharing. This person is known as the Data Protection Officer. The Data Protection Officer is Mrs Rayhana Begum.

If you have any questions or concerns regarding the information we hold on you, the use of your information or would like to discuss further, please contact the Sentinel Homecare Limited to “FAO Data Protection Officer”

“FAO Data Protection Officer”  
Sentinel Homecare Limited  
1 Thornbridge Mews  
Bradford  
BD2 3BL  
Email: [Rayhana.begum@sentinelhomecare.co.uk](mailto:Rayhana.begum@sentinelhomecare.co.uk)  
Phone: 01274 541 402

## **Can I access my information?**

Under GDPR 2018 a person may request access to information (with some exemptions) that is held about them by an organisation. For more information on how to access the information we hold about you please refer to [address above](#).

## **Contacting us if you have a complaint or concern**

We try to meet the highest standards when collecting and using personal information. We encourage people to bring concerns to our attention and we take any complaints we receive very seriously. You can submit a complaint through the Trust’s Complaints Procedure, which is available on our web site, or you can write to:

Quality Assurance Officer  
Sentinel Homecare Limited  
1 Thornbridge Mews  
Bradford  
BD2 3BL  
Email: [info@sentinelhomecare.co.uk](mailto:info@sentinelhomecare.co.uk)  
Phone: 01274 541 402

If you remain dissatisfied with Sentinel’s decision following your complaint, you may wish to contact:

Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF Their web site is at [www.ico.gov.uk](http://www.ico.gov.uk)