Privacy Notice for Parents & Guardians

This privacy notice sets out important information about how we will collect and use personal information about you. This notice also describes what legal rights you have when we handle your information.

This privacy notice applies to parents, guardians, carers, attorneys, family members, relatives, and next of kin of our services users, and includes patients, residents, clients, children and young people. We may change this privacy notice from time to time so it is best always to check on our website for the latest version.

Please take a moment to read this privacy notice. If you have any questions, please contact us, and details about how you may do that are included below.

Who are we?

We are Elysium Healthcare. Our hospitals, clinics, homes and schools are run by companies within our group. All these companies are registered at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN and their full names and registered company numbers are listed below:

Elysium Healthcare Limited (04063391)	Elysium Healthcare No.2 Limited (06244878)	Elysium Healthcare No.3 Limited (02989725)
Elysium Healthcare No.4 Limited (03257732)	Elysium Healthcare (Farndon) Limited (05255132)	Elysium Neurological Services (Badby) Limited (05558328)
Elysium Neurological Services (Adderley) Limited (09595914)	Stanley House Limited (05755615)	Elysium Healthcare (Lighthouse) Limited (05820919)
Elysium Healthcare (Acorn Care) Limited (03147293)	Elysium Healthcare (Phoenix) Limited (04227738)	Elysium Healthcare (Healthlinc) Limited (01440442)
Elysium Healthcare (Field House) Limited (05148271)	Elysium Care Partnerships No.2 Limited (05442152)	The Bridge Care Centre Limited (10310700)
Darlington Neurological Care Centre Limited (10532297)	Elysium Healthcare (Gregory House) Limited (08943865)	Elysium Care Partnerships Limited (06045903)
Pendarren Court Limited (09577953)	Elysium Healthcare (St Mary's) Limited (05131149)	Elysium Healthcare (All Saints) Limited (07807446)
Focus on Care Recruitment Limited (04012937)	The Chimneys Limited (10282525).	Elysium Healthcare (Ann House) Limited (08624668)
Regis Healthcare Limited (08516686)	Vivre Care Limited (07578613)	

Each of these companies may, to the extent relevant, collect, retain and use information about you and we refer to these in this privacy notice as Elysium Healthcare.

What information do we hold about you?

We hold information about you in connection with the care and treatment, education or other services that we may provide to a service user, patient, child or young person you are responsible or care for or are a relative to. This may include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Emergency contact information.

- CCTV (audio & images) footage and other information obtained through electronic means.
- Information about your use of our information and communications systems.
- Photographs, videos, and blogs.

We may also hold more sensitive information about you, such as information about your health where this is connected with or relevant to the care and any treatment of those in our care (e.g. any medical conditions, diagnosis, medication, disabilities or special needs).

How is your personal information collected?

We typically obtain personal information about you when a person who you have responsibility for or is connected with you is referred or admitted to one of our services. This information may be given to us by:

- Yourself, the service user or family.
- Those involved in the service user's care and treatment, such as the NHS, local authorities, doctors and other clinicians and health professionals, or by those funding the service users care and treatment.

Personal information may also be created while the service user you have responsibility for or are connected with is under our care.

Your personal information can be kept as a paper record and electronically on a secure computer system.

It cannot be accessed by anyone other than us or by those involved in the service user's care and treatment or education.

How will we use information about you?

We will only use your personal information when the law allows us to. We will use your personal information:

- With your consent.
- Where it is in relation to a contract we have entered into with you.
- When there is a legal reason we need to use it.
- Where it is necessary for our justifiable interests (or those of a third party) and your interests and rights do not override those interests.

When we need to use any sensitive, personal information about you such as healthcare information, further rules apply. We can only use this information:

- In limited circumstances, but only if you tell us it is ok to do so.
- Where it is needed for healthcare reasons.
- Where it is needed in relation to a legal matter.
- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

Why we collect and use your personal information

We will use your personal information:

- For medical purposes, to provide treatment and care to any person for whom you have a responsibility for or are connected with.
- Where we have to make decisions about their treatment and care.
- Where we speak with others involved in their treatment and care, such as GPs, consultants, advocates, care workers, the NHS, and local authorities.
- To collect payments or financial contributions where you are responsible for these.
- Where we need to meet a legal requirement.
- To gather feedback about our services.
- Where the service user is insured, providing information about their treatment to their insurer, so they can pay treatment expenses.

What happens if you don't want to give us your personal information?

The information we hold about you is mainly given to us by you or by those in our care that you have a responsibility for or are connected with.

We ask you to provide as much information to us as you can so that we can give them the most effective care and treatment.

You don't have to tell us all of your personal details. You can tell us just the information you are happy for us to know, but this may mean that we might not be able to give those in our care that you have responsibility for or are connected with the full range of care and treatments that we have because we don't know enough about you.

Do we share information about you to others?

Yes, we do. Sometimes, other organisations involved in the care of anyone you have responsibility for or are connected with, including those responsible for service users' funding or a legal matter, may look at information that relates to you. This includes medical practitioners, GPs, consultants, advocates, care workers, the NHS, local authorities the police, and lawyers.

Access to your information is on a "need to know" basis.

If you provide funding or make financial contributions in relation to the care of someone you are responsible for or are connected with, and are either late in making payments to us or fail to pay us for the treatment you have received any information relating to outstanding money owed to us (such as copy invoices) may be shared with debt collection agencies. We would never share health records with them.

Sometimes, we are required to share information because we are legally required to do so. This may be because of a court order or because a regulatory body can access patients' records as part of their duties to investigate complaints, accidents or health professionals' fitness to practise. Patient records may typically reference others in them, such as family members or guardians. Information about you may also be shared with the police and other third parties where reasonably necessary for the prevention or detection of crime. Before we share any information we will make sure that it is a justified and legal reason. If the information is about you we will tell you as much as we can about it.

We may share information about you with third party suppliers, for example in relation to patient records held on computer systems. All our third-party service providers are required to take appropriate security precautions to protect your personal information.

None of our third-party service providers are allowed to use your personal data for their own purposes. We only allow them to use your personal information for certain reasons with instruction from us.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business.

We may share information about you with our regulators, such as the Care Quality Commission (https://www.cqc.org.uk/about-us/our-policies/privacy-statement), the Information Commissioner's Office (https://ico.org.uk/global/privacy-notice/), the Department of Health, Department of Education, Ofsted (https://www.gov.uk/help/privacy-notice), and the Health and Safety Executive (https://www.hse.gov.uk/privacy.htm).

Where we store your personal information and for how long, and how secure is it?

The information about you that we hold and use is held securely in the United Kingdom or the EU and stored in paper format and on our or NHS secure servers (or third party information technology providers).

We will not keep your personal information for longer than is necessary for the purpose. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Information is retained for specified periods (depending on the record) under our document retention policy. Please contact us if you would like further information about how long we retain information.

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal information, and against the accidental loss of, or damage to, personal data. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

What are your rights?

The law provides you with certain rights in relation to the information about you that we hold.

There will not usually be a charge for handling a request to exercise your rights and if we cannot comply with your request, we will usually tell you why. If you make a large number of requests or it is clear it is not reasonable for us to comply with a request, then we do not need to respond or we can charge for doing so.

Right of access - You have the right to access information held about you. This includes details of the information we hold about you and a copy of that information. The information will be provided free of charge and, unless there are grounds for extending the statutory deadline, the information will be provided to you within one month of receipt of your request. Please note we will generally also ask for confirmation of your identity and may need further information from you in order to locate the information, in which case the time period starts from the date we have that detail. Please note that in some cases we may not be able to comply fully with your request, such as where your request also

involves information about someone else and it would not be fair to that other person to provide the information to you.

Right to rectification - We take reasonable steps to ensure the information we hold about you is both accurate and complete. However, you are entitled to have the information rectified if that is not the case. Unless there are grounds for extending the statutory deadline, we will respond within one month of receipt of a rectification request.

Right to erasure (sometimes referred to as the right to be 'forgotten') - In some circumstances, you have a right to have information about you 'erased' and to prevent us using or holding information about you. Please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims. If you make such a request and we comply with it, please be aware that we will retain a note of your name, the request made and the date we complied with it.

Right to restrict processing - In some situations, you have a right to 'block' or suppress our holding or using information about you. As with the right to erasure, please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims.

Right to data portability - You have the right to obtain and re-use your personal data for your own purposes across different services, allowing you to move, copy or transfer personal data from one IT environment to another. This right, however, only applies to personal data you have provided to us, where the processing is based on your consent or for the performance of a contract; and when the processing is carried out by automated means.

Rights relating to automated decision making - You have the right not to be subject to a decision when it is based on automated processing (i.e. by a computer alone), and it produces a legal effect or a similarly significant effect on you.

Right to withdraw consent - You have the right to withdraw consent to us holding or using information about you, but only if 'consent' is the basis for us holding or using your information.

Right to object - You have the right to object to us holding or using information about you in certain situations – where this is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing. She may be contacted at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email Data.Subject.Request@elysiumhealthcare.co.uk.

Complaints to the Information Commissioner's Office

You can complain to the Information Commissioner's Office (ICO) if you are unhappy with the way we have dealt with a request from you to exercise any of your rights or if you think we have not complied with our legal obligations. Whilst you do not have to do so, we would appreciate you making us aware of the issue and giving us an opportunity to respond and to address it before contacting the ICO.

Making a complaint will not affect any other legal rights or remedies that you have. More information can be found on the ICO website: https://ico.org.uk/ and the Information Commissioner's Office can be contacted by post, phone, fax or email as follows: Information Commissioner's Office, Wycliffe House,

Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 (local rate) or 01625 545 745 9 (national rate number); Fax: 01625 524 510; Email: casework@ico.org.uk

Keeping us informed

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Data protection officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you would like to know more about anything we have said here, have any questions, or would like to exercise any rights set out in this Privacy Notice, please contact our Data Protection Officer at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN; Telephone: 020 8237 1800; or email IG.Info@elysiumhealthcare.co.uk. You may also contact her if you are not happy with the way we have handled your personal information.