



Dolphin Homes Privacy Notice – Friends and Relatives

Dolphin Homes Limited is the Data Controller responsible for the personal information described in this Privacy Notice.

As part of the services we offer, we are required to process personal data about our staff, job applicants, supported people and, in some instances, relatives and representatives of supported people. Processing can mean collecting, recording, organising, storing, sharing, retrieving or destroying data.

We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this Privacy Notice. It also explains your rights when it comes to your data.

If you have any concerns, questions or requests regarding how we process your personal information, please contact us:

Telephone:	02392 475219
Emailing:	enquiries@dolphinhomes.co.uk
Data Protection Office (DPO)	Nick Heather
Senior Information Risk Owner	Darren Moody
Caldicott Guardian	Anneke Lane-Campbell

What data do we have?

As part of providing high-quality care and support services, we may process the following information about you:

- Your basic details and contact information, including your name, address, telephone number and email address.
- Information about your relationship to the supported person.
- Emergency contact information.
- Details of any legal authority you hold, such as Lasting Power of Attorney, Deputyship, Appointeeship or other representative arrangements.
- Records of correspondence and communications between you and Dolphin Homes.
- Records of meetings, visits, concerns, complaints, compliments and feedback you provide.
- Information required to support care planning, decision-making and safeguarding processes where relevant.
- CCTV, Ring Doorbell or other monitoring system recordings where you attend one of our services.



We will only collect information that is necessary to support the provision of care, maintain appropriate communication, meet our legal obligations and protect the safety and wellbeing of the people we support.

Use of recording and monitoring equipment (including CCTV and ring doorbells or equivalent)

As part of our commitment to safeguarding, maintaining a secure environment and supporting the safety and wellbeing of the people we support, staff and visitors, some services may use CCTV systems, Ring Doorbells and other recording or monitoring equipment where this is necessary, proportionate and lawful.

Recording equipment may be located at entrances, exits, external areas and designated communal areas where an assessment has identified a legitimate need.

Why we use recording equipment

We may use recording and monitoring equipment:

- To support the safety and wellbeing of supported people, staff and visitors.
- To assist with safeguarding enquiries and investigations.
- To investigate accidents, incidents, complaints and concerns.
- To help prevent and detect crime, abuse, neglect or anti-social behaviour.
- To maintain the security of our premises, buildings, grounds and property.

What may be recorded

Depending on the system in use, recordings may include:

- Images of supported people, staff, visitors, contractors and members of the public.
- Activity within designated communal areas, entrances, exits and external areas.
- Audio recordings where this forms part of authorised doorbell systems or other specifically approved equipment.

How we protect your privacy

We recognise the importance of privacy, dignity and human rights.

To protect your privacy:

- CCTV will only be used where it is necessary and proportionate.
- Cameras will be positioned only where required for the stated purpose.
- CCTV will not normally be installed in bedrooms, bathrooms, toilets, shower facilities or any area where a person would reasonably expect privacy.
- Clear signage will be displayed wherever recording equipment is operating.
- Access to recordings is restricted to authorised personnel only.



How long recordings are kept

CCTV recordings will normally be retained for a maximum of 14 days before being automatically deleted.

Where recordings are required for safeguarding enquiries, accident investigations, complaint investigations, insurance claims, legal proceedings or other documented purposes, they may be retained for longer. Such retention will be reviewed regularly to ensure continued necessity and proportionality.

Who can access recordings

Access is strictly controlled and limited to authorised personnel.

Recordings may be shared where there is a lawful basis for doing so, including with:

- Police.
- Local Authority safeguarding teams.
- The Care Quality Commission (CQC).
- Courts and legal representatives.
- Insurance providers.

If you would like further information about recording equipment used within our services, please speak to a member of staff or contact our Data Protection Officer.

Why do we process your information?

By law, we must have a lawful basis for processing your personal information.

We process your information because:

- We have a legitimate interest in maintaining accurate contact information for relatives, representatives and emergency contacts.
- It is necessary to support the provision of care and support to the people who use our services.
- We have legal obligations under health and social care legislation.
- We may be required to share information for safeguarding purposes.
- We may be required to cooperate with regulators, law enforcement agencies and other statutory bodies.
- It is necessary for the establishment, exercise or defence of legal claims where applicable.

We may also process your information with your consent. If we need to ask for your permission, we will offer you a clear choice and explain how you may withdraw that consent.

Common law duty of confidentiality

Where information is connected to the provision of health and social care services, we satisfy the common law duty of confidentiality because:

- Consent has been provided where appropriate.
- We have a legal requirement to collect, share or use information.
- The public interest in collecting, sharing or using information overrides the public interest served by protecting confidentiality, for example to prevent serious harm or support safeguarding and criminal investigations.

Where do we process your data?

So that we can provide high-quality care and support services, we may collect information from:

- You or your legal representative.
- Third parties who are involved in the care, support or representation of the supported person.

We do this face to face, via telephone, secure email, post, online forms, digital applications and other approved communication methods.

We may share information with:

- Local hospitals.
- GPs.
- Pharmacies.
- Social workers.
- Integrated Care Boards.
- Other health and social care professionals.
- Local Authorities.
- Family members or friends where appropriate and lawful.
- Organisations we have a legal obligation to share information with, including safeguarding authorities and the Care Quality Commission.
- Police and law enforcement agencies where required by law.

National data opt-out

We review our data processing on an annual basis to assess whether the National Data Opt-Out applies. This is recorded within our Record of Processing Activities.

If any processing falls within scope of the National Data Opt-Out, we will respect the choices individuals have made.

Further information can be found at: <https://www.nhs.uk/your-nhs-data-matters/>

International transfers

We do not routinely transfer personal information outside of the United Kingdom.



Where it is necessary to transfer information outside the UK, we will ensure that appropriate safeguards are in place in accordance with UK data protection legislation.

How do we store your personal information?

Your information is held securely within our care planning software and in paper records held securely within our services and offices. We retain your information for the duration of your friend or relative receiving support from us and then for a minimum of eight years after support has ended. This is explained in our Records Retention Policy, which aligns with the NHS Records Management Code of Practice.

When the retention period comes to an end, we conduct an appraisal of the information.

As a result of that appraisal, we will:

1. Securely Dispose of Your Information

Destruction of paper records is carried out under contract with an approved off-site provider authorised by the DPO.

Destruction of digital records is permanent and designed to ensure that information cannot be recovered.

2. Continue Retention Where Justified

Records may be retained where they are required for:

- Subject access requests.
- Legal proceedings.
- Coroner's inquests.
- Public inquiries.
- Other lawful purposes.

3. Other Actions

Where appropriate, we may anonymise or remove identifying information from records retained for legitimate purposes.

How we handle data protection complaints

Dolphin Homes operates a formal process for handling complaints relating to personal information.

Complaints will be:

- Managed in a structured and timely manner.
- Recorded and monitored.
- Investigated and responded to without undue delay.



You can raise concerns using the contact details provided in this notice.

Your rights

The information we hold about you belongs to you and we ensure it is used appropriately and confidentially.

You have the right:

- To request a copy of the information we hold about you.
- To request correction of inaccurate or incomplete information.
- To request restriction of processing.
- To request deletion of information where appropriate.
- To withdraw consent where processing relies on consent.
- To object to processing carried out under legitimate interests or public task grounds.
- To request information about CCTV and monitoring systems.
- To request access to CCTV recordings in which you can be identified, subject to applicable exemptions and the rights of others.

We will normally respond within one month. Proof of identity may be required before information is released.

If you have a concern or complaint about how we use your personal data, you have the right to raise this with Dolphin Homes in the first instance using the contact details provided in this notice.

We will acknowledge your complaint and investigate it in line with our data protection complaints procedure.

If you are not satisfied with the outcome of your complaint, or you prefer, you have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

<https://ico.org.uk/make-a-complaint/>