



Dolphin Homes Privacy Notice – Staff and Candidate

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?

So that we can provide a safe and professional service, we need to keep certain records about you. We may process the following types of personal information:

- Your basic details and contact information, including your name, address, date of birth and next of kin.
- Employment information, including contracts, job role, qualifications, employment history and performance records.
- Financial information such as payroll, pension, tax and bank details.
- Training, competency and professional registration records.
- Recruitment information collected during the application process.

We also process certain information classified as special category data, including:

- We may process health information including sickness records, fit notes, occupational health reports, information relating to disabilities, reasonable adjustments, maternity-related information and other health information where necessary to meet our

obligations as an employer, to support employee wellbeing, to comply with legal obligations and to ensure workplace health and safety.

- Information relating to your race, ethnic origin, religion, sexual orientation or other protected characteristics where this is voluntarily provided or required for equality monitoring and reporting purposes.

As part of your application and employment, you will be required to undergo a Disclosure and Barring Service (DBS) check.

We do not retain copies of DBS certificates. However, we do retain:

- DBS certificate number.
- Date of issue.
- Whether the certificate was satisfactory.
- Recruitment decisions relating to the check.

This information is held securely and access is restricted to authorised personnel.

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 supported people, staff and visitors, some services operate 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 a risk 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 staff, supported people and visitors.
- To assist with safeguarding 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 staff, visitors, contractors, supported people and members of the public.
- Activity within communal areas, entrances, exits and external areas.

- Audio recordings where this forms part of an approved doorbell system or authorised equipment.

How we protect privacy

To protect privacy:

- CCTV is only used where necessary and proportionate.
- Cameras are positioned only where required for the stated purpose.
- CCTV will not normally be installed in toilets, changing facilities or other areas where an individual would reasonably expect privacy.
- Clear signage is displayed where recording equipment is in operation.
- Access to recordings is restricted to authorised personnel only.

How long recordings are kept

Recordings will normally be retained for a maximum of 14 days before automatic deletion.

Where footage is required for safeguarding investigations, disciplinary processes, accident investigations, insurance claims, legal proceedings or other documented purposes, it may be retained for longer and reviewed regularly for necessity and proportionality.

Who can access recordings

Recordings may be disclosed where there is a lawful basis, including:

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

Why do we process your information?

We need this information so that we can recruit, employ, support and pay staff and comply with our legal and regulatory obligations.

We process your personal data because:

- We have a legal obligation under employment, tax, health and safety and social care legislation.
- It is necessary for the performance of your employment contract.
- It is necessary in the performance of a task carried out in the public interest.
- We have legitimate interests in operating and improving our services.
- We are required to provide information to regulators and other statutory bodies including the Care Quality Commission (CQC).
- We contribute workforce information to organisations such as Skills for Care for workforce planning purposes.



We process special category data because:

- It is necessary for employment, social security and social protection law purposes.
- It is necessary to administer statutory payments and employment benefits.
- It is necessary to meet our obligations as a health and social care provider.

We may also process your information with your consent. Where consent is relied upon, you will be given a clear choice and informed of your right to withdraw consent at any time.

Common law duty of confidentiality

Where we process health-related information, we satisfy the common law duty of confidentiality because:

- You have provided consent where appropriate.
- We have a legal requirement to collect, share or use the information.
- There is an overriding public interest that justifies sharing the information, such as safeguarding concerns or the prevention of serious harm.

Where do we process your data?

Information is collected directly from you or from authorised third parties where appropriate.

We may receive or share information with:

- HM Revenue & Customs (HMRC).
- Payroll providers.
- Pension providers.
- Occupational Health services.
- Disclosure and Barring Service (DBS).
- Training providers.
- Regulators including the Care Quality Commission (CQC).
- Professional bodies where required.
- Police and law enforcement agencies.
- Local Authorities and safeguarding agencies where required by law.

Information may be collected or shared through face-to-face meetings, telephone calls, written correspondence, email, electronic systems, recruitment systems and business applications.

International transfers

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

Where it is necessary to transfer information internationally, appropriate safeguards will be implemented in accordance with UK data protection legislation.

How do we store your personal information?

Your information is held securely within our HR systems, rostering software, training platforms, Microsoft systems and paper records stored at services or Head Office. Access is restricted to authorised individuals who require the information to carry out their duties.

Different categories of records are retained for different periods in accordance with our Records Retention Schedule and the NHS Records Management Code of Practice.

Once retention periods expire, records are reviewed and one of the following actions is taken:

1. Secure Disposal

Paper records are securely destroyed by an approved destruction provider authorised by the DPO.

Electronic records are permanently deleted or securely archived to prevent unauthorised access or recovery.

2. Continued Retention

Records may be retained where required for:

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

3. Other Actions

Where appropriate, information may be anonymised or stripped of identifying details while being retained for lawful 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 concerns about how your information has been handled, you have the right to raise the matter with Dolphin Homes in the first instance using the contact details in this notice. We will investigate your concern in line with our data protection complaints procedure.

If you remain dissatisfied, or would prefer to do so, 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/>