



Privacy Notice for Relatives, Next of Kin, Representatives of Residents, Contractors and Other Relevant Parties

This Privacy Notice explains how Saint Cecilia's Care Group collects, uses, stores, and protects the personal data of relatives, next of kin, legally authorised representatives of residents in our care homes, contractors and others relevant parties. It complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

WHO ARE WE

Saint Cecilia's Care Group is the Data Controller of any personal data you provide in your capacity as a relative, representative of a resident, contractor, or other relevant party associated with our organisation.

Our Data Protection Officer is Aaron Padgham, who ensures we meet our legal responsibilities under data protection law.

WHAT PERSONAL DATA WE COLLECT AND WHY

Type of Information	Why We Collect It	
Name and contact details (address, email, phone)	So we can communicate with you as a next of kin, emergency contact, representative, contractor or supplier	
Relationship to the resident	To confirm your role and responsibility (e.g. Power of Attorney, next of kin)	
Financial details (e.g. if paying fees or managing accounts)	To administer payments, invoices, or financial arrangements related to the resident's care, or service that you provide the company	

Contractual details (e.g. if you have signed a resident's care contract, or if you provide a service to the organisation)	To maintain legally binding agreements for funding or care provision, or provide a service to the organisation.	
Mailing address for newsletters or updates	To send care home newsletters or communications (only with your consent)	
Consent records (e.g. for photos, for communication preferences or marketing)	To ensure we contact you appropriately and respect your preferences	

We will only use your information for these clear and limited purposes.

WHERE AND HOW WE STORE INFORMATION

Your information is securely stored in:

- Our digital resident records and care management systems
- Financial and invoicing platforms
- Encrypted email and internal communication systems
- Secure document storage on SharePoint (internal document sharing)
- Mailing or contact lists for newsletters (only if you have consented)

We securely store information in systems that support care delivery and resident administration, as well as operational administration. Examples include our email platform, email correspondence (both to and from us) will be retained for the duration required by applicable data retention laws and regulations. SharePoint for internal records, and systems used for financial arrangements or contact management. Access is restricted to relevant staff involved in care or administration.

USE OF TECHNOLOGY AND MONITORING TOOLS

In certain circumstances, we may use digital tools and services that support the effective running of the organisation. These include:

- AI assistance tools (e.g. Microsoft Copilot) used by authorised staff to support drafting, summarising and communication. These tools are used in a way that protects confidentiality and avoids use of identifiable personal data unless appropriate safeguards are in place.
- These tools are never for private discussions involving residents, contractors, suppliers or other parties unless there is a clear need and a lawful basis exists.
- Meeting transcription services (e.g. Magic Notes) which may be used to record or summarise in-person or remote meetings. Where this is the case, staff will be informed beforehand and given the opportunity to ask questions or decline if appropriate.
- CCTV systems are in place at some of our sites for safety, security and safeguarding purposes. These systems operate in accordance with our CCTV policy, and any footage involving staff will be processed in line with our legal obligations and internal procedures.

LAWFUL BASIS FOR PROCESSING

We process your personal data under the following lawful bases:

- **Legitimate interests** – communicating with you in your role as a next of kin, responsible party
- **Contract** – if you have signed a resident's care contract or are involved in payments, or have an agreement/contract as a supplier or contractor
- **Legal obligation** – where the law requires us to retain or provide data (e.g. for financial records)
- **Consent** – for non-essential communications like newsletters or marketing

WHO WE SHARE YOUR DATA WITH

Who We Share Your Data With

Your information may be shared where necessary with:

- NHS or social care teams involved in the resident's care
- Local authorities, funding bodies, or safeguarding teams (if relevant)
- Accountants or legal advisors (only where appropriate)
- Regulatory bodies such as the Care Quality Commission (CQC)

We do not sell your data or use it for marketing unless you have given specific consent.

INTERNATIONAL TRANSFERS

We do not transfer your data outside of the UK or EEA. If this ever becomes necessary (e.g. via a secure cloud provider), we will ensure appropriate legal safeguards are in place.

HOW LONG WE KEEP YOUR DATA FOR

We keep your information only for as long as necessary, depending on:

- The legal or contractual basis under which we received it
- Our duty to retain financial or contact records (typically 6–8 years after the care arrangement ends or following the rules for retention periods for other document)

Data is securely deleted or destroyed once no longer needed.

YOUR RIGHTS

You have the right to:

- **Access** the information we hold about you
- **Correct** any inaccurate or incomplete data
- **Request deletion** of your information in certain circumstances

- **Object** to how we use your data (where applicable)
- **Withdraw your consent** (if consent was the lawful basis)

You can exercise your rights at any time by contacting us.

NO AUTOMATED DECISION-MAKING

We do not use automated systems to make decisions about you.

QUESTIONS OR COMPLAINTS

If you have any concerns about how your data is used, you can:

- Contact your loved one's Care Home Manager
- Contact our Head Office on 01723 502411

Or contact the Information Commissioner's Office (ICO):

<https://ico.org.uk/concerns>

0303 123 1113