

## **support 4 independent living**

### **Privacy Notice 2026**

#### **for Clients**

*For the purposes of this policy, when we use the terms 'we' or 'us', we are referring to Support 4 Independent Living & the services we provide.*

#### **About Us**

Support 4 Independent Living is a partnership which has been set up to support people with a learning disability to access 'a life more ordinary', which includes the opportunity to live as independently as possible, access their local community & be active citizens in their community & society as a whole, by having the same opportunities as their non-disabled peers. Support 4 Independent Living provides services to people in the Hastings & Rother area.

#### **Our Commitment to your Privacy**

We recognise the importance of protecting personal and confidential information in the way we run our service and to meet our legal duties. We have developed reasonable technical, security and procedural control required to protect your personal information for the whole of the time it is held by us, in whatever format that information is held in, until it is destroyed or deleted.

If you have any concerns or questions please contact us:

The Managing Director  
12 Edmund Road  
Hastings  
East Sussex TN35 5JZ

#### **What is Personal Data**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

#### **Privacy Statement**

Following the changes to the Data Protection Law in the UK and EU in May 2018, this Notice sets out how we process personal information about our staff, clients and, in some instances friends or relatives of our clients, also referred to as 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.

## **Privacy Statement** continued.....

To ensure we process your personal information fairly and lawfully, this Notice informs you:

- Why we need your personal information
- How & where it is processed
- With whom it is shared
- Record Keeping & Retention
- How it is securely disposed of
- What rights you have in relation to the personal information we collect

## **The Principles of the Data Protection Act 2018 & UK GDPR**

The Data Protection Act 2018 covers manually maintained records (paper files) and information stored on computers (electronic data).

In accordance with the 7 principles of the Act, Support 4 Independent Living will ensure that all personal information relating to clients and its staff is:

- Processed fairly, lawfully and transparently
- Clear, accountable and auditable (Accountability)
- Adequate, relevant and not excessive for its purpose (Data minimisation)
- Accurate and kept up-to-date (Accuracy)
- Not kept for longer than is necessary (Storage limitation)
- Processed in accordance with the individual's rights to whom it refers (Purpose limitation)
- Safeguarded against unauthorised or unlawful processing and against loss, damage or destruction (Integrity & Confidentiality – Security)

## **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 data:

- Your basic details and contact information e.g. your name, address, date of birth and next of kin;
- Your financial details e.g. details of how you pay us for your care or your funding arrangements.

We also record the following data which is classified as "special category":

- Health and social care data about you, which might include both your physical and mental health data.
- We may also record data about your race, ethnic origin, sexual orientation or religion. Delete if you do not record this information.

## **Why do we have this Data?**

We need this data so that we can provide high-quality care and support. By law, we need to have a lawful basis for processing your personal data.

We process your data because:

- We have a legal obligation to do so – generally under the Health and Social Care Act 2012 or Mental Capacity Act 2005.

We process your special category data because

- It is necessary due to social security and social protection law (generally this would be in safeguarding instances);
- It is necessary for us to provide and manage social care services;
- We are required to provide data, as part of our public interest obligations.

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent at any time.

## **Common Law Duty of Confidentiality**

In our use of health and social care information, we satisfy the common law duty of confidentiality because:

- You have provided us with your consent (either implicitly to provide you with care, or explicitly for other uses)
- We have a legal requirement to collect, share and use the data
- The public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime).

## **Where do we Process your Data?**

So that we can provide you with high quality care and support we need specific data. This is collected from or shared with:

1. You or your legal representative(s);
2. Third parties.

We do this face to face, via phone, via email, via our website, via post, via application forms, via apps.

## Where do we Process your Data continued....

Third parties are organisations we might lawfully share your data with. These include:

- Other parts of the health and care system such as local hospitals, the GP, the pharmacy, social workers, clinical commissioning groups, and other health and care professionals;
- The Local Authority;
- Your family or friends – with your permission;
- Organisations we have a legal obligation to share information with i.e. for safeguarding, the CQC;
- The police or other law enforcement agencies if we have to by law or court order.

## National Data Opt Out

We do not use confidential care information for research or planning purposes, so the National Data Opt-Out does not normally apply to our service. If this ever changes, we will inform you before any such processing takes place.

We review our data processing on an annual basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies.

You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>

You can change your mind about your choice at any time.

## How we store and protect your information

As a provider of supported living, we handle your data with extreme care to ensure your safety and privacy:

- **Physical Files:** Any paper records (such as daily logs or care plans) are stored in **locked, fire-resistant cabinets** at our registered office & on site. Access is strictly limited to staff members directly involved in your care.
  - **Digital Records:** We use **industry-standard encryption** and secure cloud storage / password-protected devices to store your electronic records. We use Multi-Factor Authentication to prevent unauthorised access.
  - **Retention:** We only keep your information for as long as necessary. In line with social care regulations, we typically hold care records for a lifetime 6 years, after you stop using our service, after which they are securely shredded or permanently deleted, *please see Retention policy detailing periods*

## **How we store and protect your information** continued.....

- **Sensitive Data:** We process your health and support needs under **Article 9(2)(h) of the UK GDPR** to ensure we provide you with the correct level of care.

Support 4 Independent Living also has a 'No Personal Device' policy so all data is only held on site or in the registered office

### **Sensitive Information**

We may collect information about you that is considered sensitive. This data is collected to monitor for equality & diversity & will only be shared if it is anonymised.

Your information is securely stored for the time periods specified in the [Records Management Code of Practice](#), which we have as a PDF and we use as a guide, as & when required. We will then dispose of the information as recommended by the Records Management Code for example we will:

- securely dispose of your information by data deletion & data destruction, through Microsoft 365 Business Premium. Hard drives are wiped to legal standards of destruction and paper copies are shredded. For full details, please ask to see our Record Keeping & Retention Policy.
- archive your information at the office address either in secure archive boxes for paper copies or on our digital system which is managed through Microsoft 365 Business Premium.
- If any other action is required, this will be assessed, at the time to ensure safe & secure procedures are adopted.

### **Our Website**

We do not process any data about you via our website. This Privacy Notice can be found on our website

### **Your rights**

The data that we keep about you is your data and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

1. You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service;
2. You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request;

**Your rights** continued.....

3. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for.
4. You may also request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for, but you do not wish for it to be erased.
5. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time – please contact us to do so.
6. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.

If you would like to complain about how we have dealt with your request, please contact:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF <https://ico.org.uk/global/contact-us/>

## **Appendix**

### **The Seven Principles of the Data Protection Act 2018**

- **Lawfulness, fairness, and transparency**: Data must be processed legally, fairly, and in a transparent manner, with a valid lawful basis for processing.
- **Purpose limitation**: Data must be collected for specific, explicit, and legitimate purposes and not used for incompatible reasons.
- **Data minimisation**: Only the minimum amount of personal data necessary for the intended purpose should be collected and processed.
- **Accuracy**: Personal data must be accurate and kept up to date; inaccurate data must be erased or rectified without delay.
- **Storage limitation**: Data should only be kept for as long as necessary for the purpose it was collected.
- **Integrity and confidentiality (Security)**: Appropriate security measures must be in place to protect personal data against unauthorized processing, loss, destruction, or damage.
- **Accountability**: Data controllers are responsible for complying with the above principles and must be able to demonstrate that compliance.

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These principles apply to all "personal data" and are central to maintaining compliance with the [UK Information Commissioner's Office \(ICO\) guidelines](#)