



# Supplemental Privacy Notice for Care and Support

## Who are we?

emh Care & Support Limited ('emh Care & Support'), which is registered as a private limited company in England and Wales with registration number 02488821, is a group company within East Midlands Housing Group Limited ('emh Group'), which is a registered co-operative and community benefit society with registration number 30476R and operates as a non-asset owning parent company. emh group has two largely ring fenced functional divisions: emh Housing and Regeneration Limited, trading under the name 'emh', which is a Registered Provider regulated by the Regulator of Social Housing (registration number 4775) and emh Care & Support, whose regulated activities fall within the remit of the Care Quality Commission.

For the purposes of this privacy notice, when we say "we", "us" or "our", we are referring to emh Care & Support Limited. This Privacy Notice is supplementary to, should be read in conjunction with, and does not amend and/or replace the following:

[Privacy Notice for Customers and Residents](#)

## What is the purpose of this notice?

This privacy notice aims to give you information on how we collect and process your personal information throughout your care with us. It makes you aware of how and why your personal information will be used, namely for the purposes of the performance of our contract with you as our customer, and how long it will usually be retained for. It provides you with certain information that must be provided under the retained EU law version of the General Data Protection Regulation (EU) 2016/679 ('the UK GDPR'), Data Protection Act 2018 and any subsequent legislation or regulatory requirements in force from time to time, or any successor legislation.

This notice primarily covers how we use information relating to our service users. It makes you aware of how and why your personal information will be used, namely for the purposes of managing your service level agreement, and how long we will usually keep your personal information for. In these cases, we will be the "data controller" for the purposes of data protection law.



## What information do we collect about you?

In addition to the information collected in our **Privacy Notice for Customers and Residents**, emh Care & Support may also collect the following categories of information:

<b>What information we collect, why we collect it, the legal basis for doing so, and how long we keep it for:</b>			
<b>What</b>	<b>Why</b>	<b>Basis</b>	<b>Retention</b>
Contact information <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Previous address</li> <li>• IP (Internal Protocol) address</li> <li>• Telephone numbers</li> <li>• Email address</li> <li>• Supporting documents that may also contain photographs of you and any joint applicants</li> </ul>	Your tenancy agreement is a contract between you, any other person in your household (should you hold a joint tenancy) and your landlord.  This data is used to set up and maintain your tenancy account with us.  To help prevent tenancy fraud	B	Life of tenancy + 6 years after tenancy ends
<ul style="list-style-type: none"> <li>• Details of any support needs you have</li> <li>• Details of those people providing additional support</li> <li>• Next of kin details/emergency contacts</li> <li>• Disability information</li> </ul>	As required by our regulator and to provide information on extra services we provide – such as tenancy support.	F	Life of tenancy but regularly reviewed
<ul style="list-style-type: none"> <li>• Authority to Act or Power of attorney</li> </ul>	We use this information to ensure we deal with the most appropriate person dealing with your affairs	F	Life of tenancy but regularly reviewed
Details of who is living with you	Used to ensure you are not overcrowded or under-occupying a property.	B	Life of tenancy but regularly reviewed
Closed Circuit Television (CCTV)	Some of our locations and offices have Closed Circuit Television (CCTV) and you may be recorded when you visit them. CCTV is used to provide security and protect both our visitors and communities. CCTV will be only be viewed when necessary (e.g. to detect or	F	CCTV recordings will be retained for 30 days and deleted within one week thereafter



	prevent crime) and footage is stored for set period of time after which it is recorded over. emh complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices so you know when CCTV is used.		
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Types of Legal Basis (Personal Data)					
A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest

We collect information when you register with us or express interest in any of the services we provide. Information about you may be passed on to us via local authority bodies as we are providing social housing / care and support. For further information please see our general needs **Privacy Notice for Customers and Residents**.

If you apply to work for us or you work for us, the information we hold about you will have been provided by yourself, we also collect information about you from internal sources, such as your manager, and in some cases, external sources, such as referees and government agencies like the Disclosure and Barring Service. For further information please see our [Privacy Notice for Workforce and Job Applicants](#).

**What particularly sensitive information we collect about you**

What information we collect, why we collect it, the legal basis for doing so, and how long we keep it for:			
What	Why	Basis	Retention
Details of unspent convictions/ criminal offences attracting a custodial sentence/on a register/person of interest	To ensure that we house you appropriately. To ensure that specialised support can be offered where required.	F	Life of tenancy but regularly reviewed. If no issues when conviction spent data will be deleted after 1 year following suspension
Disability information	As required by our regulator, in accordance with our legal obligations under the Equality Act 2010 and to provide information on extra services we	B	Life of tenancy but regularly reviewed



	provide – such as tenancy support.		
<ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Religion</li> <li>• Sexuality</li> </ul>	For monitoring and analysis purposes, as required by our regulator, for compliance with the Equality Act 2010, and to provide information on extra services we provide.	B	Life of tenancy, but regularly reviewed
Support files including <ul style="list-style-type: none"> <li>• Support plans and Risk assessments and associated documents</li> <li>• Medication Administration Records</li> </ul>	As required by our regulator, in accordance with The Health and Social Care Act 2008 (Regulated Activities) (Amendment) Regulations 2015	C	6 years after date of last contact

Types of Legal Basis (Special Category Data)					
<b>A</b> – Consent	<b>B</b> – Social protection law obligation	<b>C</b> – Vital interests	<b>D</b> – In the public domain	<b>E</b> – For legal claims	<b>F</b> – Public interest

**How do we use your personal information?**

For further information about the purposes for which we will use your personal information, please see the general **Privacy Notice for Customers and Residents**.

**When do we share your information?**

For further information about when we will share your personal information, please see the general **Privacy Notice for Customers and Residents**

**How do we keep your information secure?**

For further information about how we keep your information secure, please see the general **Privacy Notice for Customers and Residents**.

**How long do we keep your information for?**

For further information about how long we store your information for, please see the general **Privacy Notice for Customers and Residents**.



## Access to and correction of the information we hold about you

For further information your right to access and correct the information we hold about you, please see the general **Privacy Notice for Customers and Residents**.

## Your rights

For further information your rights, please see the general **Privacy Notice for Customers and Residents**.

## Complaints

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention in the first instance if you think that our collection or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see **How to contact us** below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

**Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**

## How to contact us

Please contact us if you have any questions about this, or any of our privacy notices or the information we hold about you. You can do so via one of the contact details below;

- **Email:** [dataprotection@emh.co.uk](mailto:dataprotection@emh.co.uk)
- **Post:** Governance & Assurance Team, Memorial House, Stenson Road, Coalville, Leicestershire, LE67 4JP.
- **Telephone:** 01530276000

We have appointed a Data Protection Advisor to oversee our compliance in line with Data Protection legislation. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Advisor using the details above.

Our Data Protection Officer who is registered with the Information Commissioner's Officer is our Head of Governance and Assurance. Please contact our Data Protection Officer using the details above.



## **Privacy Notice updates**

Our Privacy Notice will be regularly reviewed, and it may change at any time in the future, we encourage you to check this Privacy Notice regularly.