

Elderholme Nursing Home customer privacy notice

Registered name: Wirrelderly Ltd

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post

Clatterbridge Road, Bebington, Merseyside, CH63 4JY, GB

Telephone

01513340200

Email

enquiries@elderholme.co.uk

What information we collect, use, and why

We collect or use the following information **to provide patient care, services, pharmaceutical products and other goods:**

- Name, address and contact details
- Gender

- Pronoun preferences
- Date of birth
- NHS/HSC/CHI number
- National Insurance number
- Next of Kin details including any support networks
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Payment details (including card or bank information for transfers and direct debits)
- Insurance policy details
- Credit reference information
- Records of meetings and decisions
- Call recordings
- Information about income and financial needs for funding or personal budget support

We also collect the following information **to provide patient care, services, pharmaceutical products and other goods:**

- Racial or ethnic origin
- Religious or philosophical beliefs

- Health information
- Sexual orientation information

We collect or use the following information **for safeguarding or public protection reasons:**

- Name, address and contact details
- NHS/HSC/CHI number
- Emergency contact details
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Relevant information from previous investigations
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Records of meetings and decisions

We also collect the following information **for safeguarding or public protection reasons:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following personal information **for patient app or portal functionality:**

- Names and contact details
- Addresses

- Medical history
- Payment details
- Account information, including registration details
- Information used for security purposes

We also collect the following information **for patient app or portal functionality**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following personal information **to comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Health and safety information
- Financial information
- Insurance details
- Safeguarding information
- Criminal offence data

We also collect the following information **to comply with legal requirements**:

- Racial or ethnic origin
- Religious or philosophical beliefs

- Health information
- Sexual orientation information

We collect or use the following personal information **for recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
- Health information, vaccinations

We also collect the following information **for recruitment purposes**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information
- Sexual orientation information

We collect or use the following personal information **for information updates, marketing or market research purposes**:

- Names and contact details

- Address
- Marketing preferences
- Records of consent, where appropriate

We also collect the following information **for information updates, marketing or market research purposes:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric information (where used to identify someone)
- Health information
- Sexual orientation information

We collect or use the following personal information **for medical research or archiving purposes:**

- Names and contact details
- Address
- Recorded images such as photographs, X-rays or scan images
- Records of consent, where appropriate
- Information relating to the national data opt-out

We also collect the following information **for medical research or archiving purposes:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims:**

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Video recordings of private or staff only areas
- Call recordings
- Dashcam footage - outside vehicle
- Dashcam footage - inside vehicle
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect the following information **for dealing with queries, complaints or claims**:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **to provide patient care, services, pharmaceutical products and other goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interest:
 - By collecting people's information we process and store it for the purpose to deliver the best care to our service users to manage their health conditions and provide employment to employees.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for patient app or portal functionality** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food,

water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for medical research or archiving purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may

apply, except the right to erasure, the right to object and the right to data portability.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Other health and care providers
- Social services
- Charities or voluntary sector organisations
- Schools, colleges, universities or other education organisations

- CCTV footage or other recordings
- Insurance companies
- Publicly available sources
- Councils and other public sector organisations
- Relevant regulatory authorities
- Previous employers
- Market research organisations
- Suppliers and service providers
- Social Media

How long we keep information

Term	Reasoning	Type of records
Organisations lifetime plus 6 yrs	Records Management Code of Practice 2021 (RMCP)	Building plans, including records of major building works
50 years	Insurers requirement	Employment or engagement applications references identity verification records Disclosure and Barring service or similar statutory Disclosure reference numbers and pertinent related correspondence in respects of all personnell Abuse protection policy and revisions thereof together with records of abuse protection policy training delivered to all personnel All records of abuse allegations or incidents and action taken including notifications to the appropriate authorities Copies of relevant information and accompanying correspondence relating to abuse assault or molestation of or by our service users whilst in our care contained in their referral assessment treatment and care plans
40 years	RMCP	Equipment monitoring, and testing and maintenance work where ASBESTOS is a factor
Lifetime of installation	RMCP	Equipment monitoring – general testing and maintenance work Inspection reports
7 years	Statutory requirements	Accounts information/documentation Off duties
8 years	Statutory requirement	Adult health records Adult social care records (including care plans)
6 years	RMCP	Staff training records – other Disciplinary notes
5 years	RMCP	Clinical audits
2 years	RMCP	Patient property books Petty cash
20 years	RMCP	Board meetings Chief Executive records

Who we share information with

Data processors

Vigo IT Solutions

This data processor does the following activities for us: Manage IT systems

Planday

This data processor does the following activities for us: Store staff information and work schedules

PCS and Blysfyl

This data processor does the following activities for us: Store residents information and daily care records

Others we share personal information with

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Charities and voluntary organisations
- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- External auditors or inspectors

- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Debt collection agencies
- Current employers
- Previous employers
- Suppliers and service providers
- Professional consultants

Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, 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);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

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

Last updated

12 February 2025