



PRIVACY NOTICE FOR PEOPLE WE SUPPORT

Applies to Aspirations Care Ltd. and Aspirations (SL) Ltd.

1. Introduction

Aspirations Care Ltd. and Aspirations (SL) Ltd. (herein after referred to as “Aspirations”, “we”, “us”, “our”) are committed to protecting your personal data and respecting your privacy.

This Privacy Notice explains how we collect, use, store, share, and protect personal data relating to **People We Support**, including individuals receiving care and support services from us under supported living, residential, or community-based arrangements.

This notice applies:

- Before support begins (assessment and referral stage)
- While you receive care and support from us
- After support ends, for a limited period in line with legal and regulatory requirements

We review this Privacy Notice regularly to ensure it remains accurate and up to date.

2. What Is Personal Data?

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, **personal data** means any information that relates to an identified or identifiable individual.

This includes information that:

- Identifies you directly (such as your name or NHS number), or
 - Identifies you indirectly (such as a combination of details about your health, care needs, or living arrangements)
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3. Who Is Responsible for Your Personal Data?

Aspirations is the **data controller** for the personal data processed about you.

This means we decide:

- What personal data is collected
- How it is used
- How it is stored and protected
- Who it is shared with and why

We process personal data in accordance with:

- The UK GDPR
 - The Data Protection Act 2018
 - Guidance issued by the Information Commissioner's Office (ICO)
 - Health and social care legislation and regulatory requirements
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4. Our Legal Basis for Processing Your Personal Data

We only process your personal data where the law allows us to do so.

Article 6 UK GDPR - General Personal Data

We rely on one or more of the following lawful bases:

- **Article 6(1)(c) - Legal Obligation**
Where processing is necessary to comply with legal duties, including safeguarding, health and safety, and regulatory requirements.
- **Article 6(1)(e) - Public Task**
Where processing is necessary to carry out tasks in the public interest, including the provision of regulated health and social care services.

- **Article 6(1)(b) - Contract**
Where processing is necessary for the performance of a contract, such as where you or your representative have entered into a service agreement with us.

Article G UK GDPR - Special Category Data

Much of the data we process about People We Support is **special category data**, including health and care information. We process this lawfully under one or more of the following conditions:

- **Article G(2)(h) - Health or social care**
For the provision and management of health and social care services.
- **Article G(2)(b) - Employment and social protection law**
Where relevant to support arrangements and safeguarding responsibilities.
- **Article G(2)(g) - Substantial public interest**
Including safeguarding of children and adults at risk.

These conditions are supported by **Schedule 1 of the Data Protection Act 2018**, and we have an **Appropriate Policy Document** in place which sets out how we protect this information.

Criminal Records Data - Article 10 UK GDPR

Where relevant, we may process information relating to criminal offences or safeguarding concerns (for example, where this is necessary to protect you or others). This is done strictly in line with the Data Protection Act 2018 and safeguarding legislation, and only where lawful and proportionate.

We do **not** rely on consent as the main legal basis for processing your data, as care and support services cannot usually be delivered safely or lawfully on the basis of consent alone.

5. How We Obtain Your Personal Data

We may collect personal data about you from a variety of sources, including:

- You directly
- Family members, carers, or representatives (where appropriate)
- Local Authorities and commissioning bodies
- Health professionals and NHS organisations

- Previous care providers
 - Safeguarding partners
 - Educational or vocational services
 - Other professionals involved in your care and support
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6. What Personal Data We Hold About You

The personal data we hold may include:

- Name, address, date of birth, and contact details
 - Emergency contacts and next of kin
 - NHS number and GP details
 - Care and support needs, assessments, and reviews
 - Support plans, risk assessments, and behaviour support plans
 - Daily records, progress notes, and outcomes
 - Medication records and treatment information
 - Safeguarding records and incident reports
 - Capacity assessments and best interest decisions
 - Communication needs and preferences
 - Cultural, religious, or dietary requirements
 - Financial information where we manage money on your behalf
 - Complaints, compliments, and feedback
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7. Sensitive and Special Category Data

Much of the information we hold about you is sensitive in nature and may include:

- Physical and mental health information
- Learning disability or neurodiversity information
- Information about your emotional wellbeing
- Information about your family life or personal circumstances
- Equality and diversity information, such as ethnicity or religion

We handle this information with additional care and security measures and only access it where necessary to provide safe, effective, and person-centred support.

8. How We Use Your Personal Data

We use your personal data for purposes including:

- Assessing your needs and planning your care and support
 - Delivering safe, effective, and person-centred services
 - Monitoring outcomes and reviewing progress
 - Safeguarding you and others from harm
 - Managing medication, health appointments, and treatment
 - Communicating with you, your family, and professionals involved in your care
 - Managing incidents, accidents, and complaints
 - Meeting legal, contractual, and regulatory requirements
 - Quality assurance, audits, and service improvement
 - Responding to inspections by regulators such as the Care Quality Commission (CQC)
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G. Who We Share Your Personal Data With

We may share your personal data, where lawful and necessary, with:

- Local Authorities and commissioning bodies
- NHS organisations, GPs, and health professionals
- The Care Quality Commission (CQC)
- Safeguarding adults or children boards
- Social workers and care managers
- Advocates and representatives (where appropriate)
- Emergency services
- Legal advisors or insurers where required
- Other professionals involved in your care and support

We only share the minimum information necessary and ensure appropriate safeguards are in place.

10. Keeping Your Information Accurate

It is important that the information we hold about you is accurate and up to date. We will regularly review your information with you and, where appropriate, your representative.

Please let us know if any of your details change or if you believe any information we hold is incorrect.

11. How Long We Keep Your Personal Data

We keep your personal data in line with our **Records Retention Policy**.

In most cases:

- Care records are retained for **at least six years** after support ends
- Some records may be kept longer where required by law, safeguarding obligations, or regulatory guidance

We only keep information for as long as it is necessary and lawful to do so.

12. Your Rights Under Data Protection Law

You have the right to:

- Be informed about how your data is used
- Access your personal data (Subject Access Request)
- Ask for inaccurate data to be corrected
- Request erasure of data in certain circumstances
- Restrict how your data is used
- Object to processing in certain situations
- Request data portability where applicable
- Not be subject to decisions based solely on automated processing

Some rights may be limited where information is needed to protect you or others, or to meet legal obligations. We will always explain our decisions.

13. How to Exercise Your Rights

If you have questions about this Privacy Notice or wish to exercise your rights, please contact:

CEO

Christine Cameron

Aspirations Care Ltd
Corinium House Barnwood Business Park
Corinium Avenue
Gloucester GL4 3HX

Aspirations (SL) Ltd
Kings Buildings
Hill St
Lydney
GL15 5HE

Email: DPO@aspirationscare.com

14. Complaints and the Information Commissioner's Office (ICO)

If you are unhappy with how we handle your personal data, 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
Telephone: 0303 123 1113

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

ICO Registration Number Aspirations Care Ltd: **Z8717214**

ICO Registration Number Aspirations (SL) Ltd: **ZB736413**