LAWRENCE HOME NURSING TEAM LTD (TRADING AS LAWRENCE NURSES)

PRIVACY POLICY

PURPOSE:

- This purpose of this policy is to explain your rights on how we use information about you and how we keep your information safe and confidential

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Appraised by: Executive Committee

Approved by: John Pritchard, Chair of Governance Committee

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Additions/Updates:

Date	Version	Summary of changes
October 2026	4.1	• Updated address for ICO
November 2025	4	• Addition of 'Trading as Lawrence Nurses' • Addition of the legal basis for processing all data
September 2022	3	• Addition of 'LTD' to Lawrence Home Nursing Team • Update to Registered Address • 'Trustee' replaced by 'Director'

Associated Policies: Clinical Privacy Policy, Confidentiality Code of Conduct, Data Protection Policy, ICT Acceptable Use Policy.

1. Introduction

Lawrence Home Nursing Team Limited (trading as Lawrence Nurses) is a registered charity in England & Wales, number 1189565 and Company registration number 12460725.

Lawrence Nurses values your privacy and is committed to protecting your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data. We'll also notify you about your privacy rights and how data protection laws protect you.

Our Site is owned and operated by Lawrence Nurses, whose registered address is:

Highlands, 73 Burford Road
Chipping Norton
Oxfordshire
OX7 5EE

The Directors are the data controllers and the Operations Manager is responsible for general data protection matters and complaints arising concerning day-to-day matters (collectively referred to as "We", "Us" or "Our" in this Privacy Policy.

Lawrence Nurses has a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing; this person is known as the Caldicott Guardian. Our Caldicott Guardian is Dr Emma Hallam-Evans, who is also a director.

Queries related to Data Protection and the Caldicott Guardian should be directed to the Data Protection Officer (see the section "How to Contact Us").

1.1. Purpose Of This Privacy Notice

This privacy notice aims to give you information on how We collect and process your personal data, which you have either provided to Us, We obtain or that We collect from third parties. It sets out:

- What personal data We collect;
- How We use your data;
- Lawful basis;
- How long We keep your information;
- How your information is protected;
- Whom We share your information with;
- International transfers;
- Your rights in relation to the information We hold about you;

This website is not intended for children.

1.2. Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, We encourage you to read the privacy notice of every website you visit.

2. The Personal Data We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioner's Office.

We may collect, process, store and transfer different kinds of personal data about you which We have grouped as follows:

- Identity Data includes first name, surname, username, title, date of birth, and gender.
- Contact Data includes telephone number/s, residential address and email address.
- Financial Data includes bank account number, sort code.
- When you fundraise for Us.
- Technical Data includes IP address, your login data, browser type and version, location, operating system, and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website, products and services.
- When you request a call back through Our website.
- Media including photos and videos.
- When you otherwise, interact with Us or provide information to a third party to be referred to Us.

Where We request further information from you, this will be explained in the relevant forms or pages, or over the telephone. You may choose to provide additional information when you interact with Us or to a third party who refers you to Us.

Where you are referred to receiving any of Our care or support

- Personal details including your title, full name, maiden name, marital status, date of birth, gender, contact details including address (billing address or correspondence address), telephone numbers, email addresses, your GP and other allied health professionals.
- Information about your life, including social history, health and well-being, treatment and care. This may also include information about your marital status, ethnicity and sexual orientation and details of medical treatments.
- Notes and reports about your health and care provision including case assessments and medication provided.
- Compliments, complaints, accidents and incidents information.

Where you are the relative, next of kin, attorney or deputy to one of our patients

Personal details including title, full name, relationship to the patient, contact details, including address, telephone numbers, and email addresses.

Please ask to see both Our Non-Clinical and Clinical Privacy Notices for full details of how We process your data.

Applying for a Job

We will collect data you give us when applying for a job or volunteering with Us, this may include:

- your bank account details and tax and residency status
- references from previous employers or educational institutions
- contact details for you and any next of kin
- qualifications
- information concerning your health and medical conditions
- information about your race, ethnicity and sexual orientation
- details of unspent criminal convictions.

Please see Our privacy notice for job applicants https://www.lawrencenurses.org/staff-privacy-notice/

2.1. Special category data

Where data processing relates to Special Categories of Data the following processing conditions apply:

- Explicit Consent has been given by the data subject.
- Processing is necessary for carrying out obligations under employment, social security or social protection law or a collective agreement.
- Processing is necessary for the purposes of the provision of health care, treatment, the management of health and services with a health professional.

2.2. Social Media Users

We use social media channels (including Facebook, WhatsApp, TikTok, YouTube and Instagram, the "Social Media Companies") to publish information about Us. If you follow or otherwise engage with Our social media channels, We will collect Usage Data to analyse how users interact with those channels. If you use social media to send Us messages or posts, We may use your Profile Data to communicate with you. When you interact with our channels, the Social Media Companies will also process your personal data for the purposes set out above as joint controllers. For more information, We would encourage you to review the privacy notices published by the Social Media Companies.

2.3. Donations and Fundraising

2.3.1. What data do we collect about you?

- Your name
- Contact address(es)
- Telephone number(s)
- Email address(es)
- Records of your communications with Us
- Donation and Gift Aid information
- Bank details when you set up a Direct Debit
- Information you may provide on Our website, such as the reason for donating

2.3.2. How do we use the data we collect about you?

We use your personal data for a number of purposes, including the following:

- To keep a record of donations you make, actions you take, and Our communications with you
- To process credit and debit card donations you make
- To process your standing order payments, you make
- To claim gift aid on your donations via HMRC
- To send you marketing information about Our work and fundraising activities
- To comply with applicable law and regulations

2.3.3. Ethical screening and minimising risk

To comply with our obligations as a charity, We must also take reasonable and appropriate steps to know who Our donors are, particularly where significant sums are donated.

Using charity law as a legal basis for processing, We may conduct due diligence to provide assurances that donations and support are from appropriate sources. This is to safeguard Our

reputation and to help Us mitigate any associated risk. We have clearly defined principles that guide how We engage in mutually beneficial relationships with companies, foundations and individuals.

These principles ensure that We raise money legally, safely and transparently. The nature and extent of due diligence research is proportionate to the fundraising opportunity. This doesn't mean that We'll research lots of personal details about every donor or question every donation.

Any information we collect for these purposes will only consist of what is necessary for Us to meet these requirements and will be processed in line with your rights. For full details, please ask to see Our Donation Policy.

3. How Can You Control Your Data?

When you submit information via Our Site, you may be given the ability to opt-out of receiving emails from Us, which you may do by unsubscribing using the links provided in Our emails or by emailing Us.
You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may withdraw your consent for Us to use your personal data at any time by contacting Us and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to provide the best possible service to you (see the section on How to Contact Us).

4. How We Use Your Data

We use your data to provide the best possible service to you.

This includes:

- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying Our services to you
- Responding to communications from you
- Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience
- Processing your donations
- Your care record will contain detailed information about your health and well-being, including illnesses, medical appointments, and treatments. It may also contain details of your attorney, deputies, your close family and next of kin. We will share these with medical and allied health professionals who have a legal and legitimate need to use the information to support the care provided to you
- We share information within Lawrence Nurses to provide necessary administrative and managerial support
- We use either personal or anonymised data to review the performance of our care services as part of Our continuing work to improve Our services and meet the needs of our patients
- We may use your details to contact you about any changes to Our care services

We are required from time to time to provide specific information about you without your or your representative's consent. This may include:

- Reporting health or safety issues including infectious diseases

- Where there is a legal or statutory requirement, court order or public authority instructing Us to do so
- Supporting police investigations, professional conduct hearings and safeguarding investigations in the public interest.
- Where there is a need to protect a vulnerable adult who is not able to decide if their personal data should be shared

In some cases, the collection of data may be a statutory or contractual requirement and We will be limited in the services We can provide you without your consent for Us to be able to use such data.

4.1. Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- Analytics providers such as Google
- Search information providers such as Google
- Contact, Financial and Transaction Data from providers of technical and payment services
- Identity and Contact Data from publicly available sources such as Experian
- Social Media sites such as Facebook, Twitter, LinkedIn

4.2. Direct Marketing

We may from time to time supply you with either email or postal newsletters, alerts etc. that you have subscribed to (you may unsubscribe, opt-out or update your preferences at any time by clicking the 'unsubscribe' or 'update my preferences' link in the email or by contacting Us (see the section on How to Contact Us).

Once you have submitted your preference to Us, We may use these for marketing purposes which may include contacting you by email, telephone or text message with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the DPA 2018, UK GDPR, and the Privacy and Electronic Communications Regulations 2003.

5. Lawful Basis

Under UK GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following bases applies:

- you have given consent and explicit consent to the processing of your personal data for one or more specific purposes, such as processing Special category data and marketing material
- processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to your entering a contract, such as, Employment.
- processing is necessary for compliance with a legal obligation to which We are subject, such as processing donations, employment and DBS checks
- Where We need to protect your vital interests e.g., in an emergency life or death situation, where the emergency services are called to treat you when you are with Us
- processing is necessary for the purposes of the legitimate interests pursued by Us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data.

We rely on our legitimate interests for the following reasons:

- keeping Our records up to date
- running Our websites and keeping them safe and secure
- presenting Our content and communications in the most effective and sustainable manner for you and your devices
- measuring how you use Our websites and improving their content and accessibility
- carrying out campaign work
- complying with legal and or regulatory requirements
- Processing complaints
- meeting Our fundraising objectives

6. How do We Store and How long do We keep your data

Personal data that We process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Our retention of your personal data is linked to your actions. Unless a longer retention period is required or permitted by law, We will only hold your Personal Information on our systems for the period necessary to fulfil the purposes outlined in this Notice, or until you request that the information be deleted (see the section “Summary of Your rights").

Please ask to see Our Retention Schedule for a detailed list of Our retention periods.

Even if We delete your Personal Information, We reserve the right to retain your personal data where such retention is necessary for compliance with a Statutory obligation (for example to maintain a copy for legal, tax or regulatory purposes,) but in such event, We will do so only as long as necessary to fulfil those Statutory obligations

6.1. Data Security

Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.

All your data is stored electronically in a secure database or in a locked filing cabinet and can only be accessed by authorised people. All users of Our system are trained in UK GDPR.

Where We engage third parties to process personal data on our behalf, they do so upon writing and are contracted to implement appropriate technical and organisational measures to ensure the security of data.

7. Whom We Share Your Personal Data With

We are committed to not sharing your data and will only do this if it is in your legitimate interest to ensure We provide you with the support and information required to make an informed decision about a service(s) or product(s).

We will not sell your data to any unconnected third parties.

We may contract with third parties to supply products and services to you on Our behalf. These may include payment processing and search engine facilities.

We might share your information across different parts of Our organisation for research and analysis.

In some cases, third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be

handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We currently contract with:

Third party name	Used to	Privacy notice
Mailchimp	Marketing E-mails	https://www.intuit.com/privacy/statement/
Beacon	Fundraising & Donations	https://www.beaconcrm.org/legal/privacy
Quickbooks	Accounts	https://www.intuit.com/privacy/statement/
Blue Stream Academy	HR and Training Storage	https://content.bluestreamacademy.com/websitedocs/PrivacyPolicy-Final-Version.pdf
Aarons Department	DBS Checks	https://www.aaronsdepartment.com/privacy-policy
BrightPay	Payroll	https://brightsg.com/privacy-notice/
Google Workspace	Document Storage	https://workspace.google.com/intl/en_uk/
Blue Spires	IT Support	https://bluespires.co.uk/privacy-policy
SoloProtect	Lone Working Device	https://www.soloprotect.com/uk/privacy-policy
Aviva	Staff Benefits	https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/group-protection-privacy-policy/
Legal & General	Staff Benefits	https://www.legalandgeneral.com/institutional/privacy-policy/

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties Service
- Providers based in the UK who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances
- Third parties to whom We may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, We may seek to acquire other businesses or merge with them. If a change happens to Our business, then the new owners may use your personal data in the same way as set out in this privacy notice
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with Our instructions

7.1. International Transfers

We may need to transfer some personal data to the third parties described above who are located outside of the UK. In such cases, We will take appropriate measures to ensure your personal data

remains protected. If the organisation is based outside of the UK and in a country that is not protected by an adequacy decision (providing an adequate level of data protection) We will take appropriate safeguards such as implementing the ICOs International Data Transfer Agreement (IDTA).

If you have any questions or need more information regarding international transfers of your personal data, please contacting Us (see the section on How to Contact Us).

7.2. Automatic Collection, Cookies and aggregate information collected from Our website.

We automatically collect some data from visitors to Our websites. This includes what pages you have viewed, for how long and where you go on Our website.

We use cookies to store information about how you use Our sites. A cookie is a piece of data stored on a user's computer to remember information about you and create a profile of your viewing preferences. Your profile is used to tailor your visit to Our website, make navigation easier, and direct you to information that best corresponds to your interests. We require your consent to place non-essential cookies on your device. You can change your cookie preferences by selecting the button in the bottom left corner from any page on Our website. View Our cookies policy https://www.lawrencenurses.org/cookies-policy/

Information is also collected about how you arrived at Our websites in the first place. This includes what links or adverts of Ours you have viewed or clicked on to reach Us, or any search terms you have used. Where you see an advert outside of Our website. We may place a cookie on your browser. This is so that, when you access Our website, We recognise that you have seen an advert of Ours elsewhere. If you have logged in, this includes your login details.

Aggregate information is collected from users using Our own web tracker. This information includes users' Anonymised Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages, and number of unique visits. This information is not linked to personal profiles or personally identifiable information provided by users. We use the information to analyse visitor trends and use of Our website, administer the website, and gather broad demographic information of Our website users.

We may use the information We receive and/or collect about you to:

- Fulfil Our obligations under any contract that We have entered into with you or with a Resident that you represent, and to provide you or the relevant Resident with information or services that you or the Resident has requested
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services We provide via the website

8. Summary of your rights

As a data subject, you have several rights and control over how your data is used:

- You can request access to, deletion of, or correction of, your personal data held by Us
- You can ask for a copy of the data you have given Us
- You can require Us to amend or change incorrect or incomplete data
- You can require Us to delete or stop processing your data, where the data is no longer necessary for the purposes of processing
- You can object to the processing of your data where We are relying on its legitimate interests as the legal ground for processing

- You can ask Us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the company's legitimate grounds for processing data
- You can ask Us to send your data to another data controller in a machine-readable format

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Notice, please contact Us using the details set out in the section “How to Contact Us”.

No fee is required – with some exceptions. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help Us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up Our response.

We try to respond to all legitimate requests within one month. Occasionally it may take Us longer than a month if your request is particularly complex or you have made a number of requests. In this case, We will notify you and keep you updated.

9. How to Contact Us

If you have any questions about Our Site or this Privacy Notice, please contact Us by email at dpo@lawrencenurses.org
by telephone on 01608 641549 and ask for the Data Protection Officer,

or by post to the Data Protection Officer,

Lawrence Nurses
Highlands, 73 Burford Road
Chipping Norton
Oxfordshire
OX7 5EE

Please ensure that your query is clear, particularly if it is a request for information about the data, We hold about you.

10. How to complain

If you are unhappy with the way that We have processed or handled your data, please contact Us (see the section How to Contact Us).
If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the Information Commissioner’s Office are:

Information Commissioner’s Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester, M1 7BL

Telephone: 0303 123 1113 Website: https://ico.org.uk/concerns/

11. Changes to Our Privacy Notice

We may change this Privacy Notice as We may deem necessary from time to time, or as may be required by English law. Any changes will be immediately posted on Our Site, and you will be deemed

to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.