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Service Area:	Directorate of Social Services
Work Area:	Adult Services
Contact Details:	Jo Williams, Assistant Director willij6@caerphilly.gov.uk 01443 864611
Privacy Notice Name:	Telecare ARMED service.
Description of Privacy Notice:	This privacy notice will explain how Caerphilly County Borough Council's Telecare Services and, where relevant, Community Resource Team will use information gathered as part of the ARMED service.

How we will use your information

Source and type of information being processed

Registration and project assessment information - ARMED service

When you register for the service you will be asked to provide information about yourself in order to set up your ARMED account and set a base line in order to assess the efficacy of the service.

Ongoing data gathering – ARMED service

When you are using the ARMED service the following activity data will be collected on an ongoing basis.

- 1) Activity Level / Polar Loop (Wrist band)
These take several readings from the wearer including activity, inactivity, sleep and whether sleep was restful.
- 2) Physical Condition / Body composition scales
The scales gather physical condition metrics, including BMI and hydration levels.
- 3) Performance / Grip Strength test
Three readings are taken, and the averages calculated.

The data is uploaded to the ARMED system via a smart phone app. Each of the participants will be issued with a smart phone to ensure this is able to take place.

In the case of the polar loop this will happen automatically. In the case of the scales and grip test, the project assistant or a representative of CRT will assist with this.

Some participants will be issued with a Doro alarm phone to upload the data. The Doro phones also have the facility to act like an emergency alarm. These individuals will be signed up to the alarm service and their information gathered and logged as per the Telecare Service (a separate Privacy Notice applies to this service).

This section will explain the categories of personal data that could be shared with us and the types of organisations/individual that may provide us with information.

Evaluation of the ARMED Service

We will ask you to provide us with information at the end of the project in order to help us evaluate the service.

We will also use the information we have gathered at the start of the process and throughout the project to help us with this evaluation.

Categories of personal data obtained

The ARMED service will obtain the following categories of your personal data:

- Name
- Address
- DOB
- Gender
- Height
- Weight
- Health and wellbeing information including
 - Sleep patterns
 - Activity / exercise
 - Information about falls in the 6 months prior to signing up to the service
- Contact Details

The ARMED service may also obtain and hold more specific information including:

- Recordings of any visits or contact you have made, or we have made with you
- Information about other members of your household
- Details of family relationships in and outside of your household
- The names and contact details of your close relatives and/or carers
- The names and contact details of other people who you, or your advocate has nominated as a contact or personal responder (for example a friend or neighbour)
- Details of your GP
- Details of your registered social landlord
- Care packages
- Details of any other services you are receiving
- Details about your needs in all areas of your life (e.g your care & support needs)
- Details of your Physical health
- Details of your Wellbeing
- Information used to assess your situation, such as assessments and reports
- Things that other organisations (such as health or care homes) tell us to help us understand your situation and needs and co-ordinate your care services more effectively
- Any additional needs or disability
- Details of your Mental health and capacity
- Details of your Personal outcomes
- Details of your Lifestyle information
- Access information for your home, including key safe locations and codes
- Information about any potential risk to people visiting your home (for example a protective pet)
- Financial information
- Criminal record
- Restorative Justice
- Deprivation of Liberty

Source of the personal data

Caerphilly County Borough Council ARMED Service receives and records information from a variety of sources on you. This information could be received from:

- You
- Family Members
- Your personal contacts (nominated by you or your advocate)
- Emergency Services
- Other departments within Caerphilly County Borough Council
- Other Local Authorities
- Health Authorities
- Department of Work and Pensions
- Court of Protection
- Utility Companies
- Regulatory bodies – Care Inspectorate Wales/Health Inspectorate Wales
- Legal Representatives
- Care Professionals
- Funeral Directors
- Partner agencies

If you would like further information on the source of information we hold, please contact Caerphilly County Borough Council. This may require you to apply for a Subject Access Request under Data Protection Legislation.

Purpose and legal basis for using your information

Purpose of processing and Legal basis for processing

ARMED technology will be used to gather various activity and health data from project participants that will then be subject to predictive modelling through the ARMED system which will identify risk traits. This will enable early intervention and reduce the risk of the participants experiencing a fall.

Where the ARMED system identifies a potential risk, this will be discussed with you and / or a nominated advocate. Where other services or agencies are required to facilitate support, your personal information will be supplied to them, but only the information necessary for them to provide that support.

We also process information in order to

- Register and process applications for the service
- Install and maintain the equipment installed for the purpose of carrying out the service
- Ensure the information we hold about you is accurate
- Ensure your equipment is working
- Manage the financial side of our contract with you
 - To send invoices
 - To manage payments, including non-payment
 - Notifying you about changes in charges
- Manage our relationship with you
 - To notify you about changes to the service, terms and conditions or privacy policy
 - To ask you to provide feedback or complete a survey to help us improve the service
- Evaluate the ARMED service

- Provide an anonymised report to our project support and funding partners United Welsh Housing Association, Aneurin Bevan ICF fund, Gwent Project Partners (local government), Welsh Government.
- Provide an anonymised report to TEC Cymru. This may be published on their website which will help other organisations looking at this and similar technology.

If it is believed at any stage of the process that an adult may be at risk then the Protection of Vulnerable Adults Procedures will be followed, which may result in a formal investigation and assessment. This may involve several agencies such as the police or health.

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016 (GDPR), a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

- 1(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. If any information falls within the definition of special category personal data then an additional condition from Article 9 of the Regulations must be identified.

Data Protection legislation also provides extra protection for personal data in relation to criminal convictions and offences. If any personal data falls within this category then an additional condition from Article 10 of the Regulations must be identified.

The condition detailed below is both an Article 9 and an Article 10 condition for processing.

- 2(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

The above Article also needs an additional condition for processing from Schedule 1 of the Data Protection Act 2018.

- 2(1) This condition is met if the processing is necessary for health or social care purposes.
- (2) In this paragraph "health or social care purposes" means the purposes of—
- preventive or occupational medicine,
 - the assessment of the working capacity of an employee,
 - medical diagnosis,
 - the provision of health care or treatment,
 - the provision of social care, or
 - the management of health care systems or services or social care systems or services.

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones

Corporate Information Governance Manager / Data Protection Officer

Email: dataprotection@caerphilly.gov.uk

Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service area for further information.

Details of main users of your information

The main users of your information will be Caerphilly County Borough Council Telecare Services.

If your case requires further action or involvement from Social Services, your information/data will be transferred to a team within Adult Services to receive the appropriate services or support.

These teams may include:

- Older People teams
- Occupational Therapy Team
- Physical Disability & Sensory Impairment Team
- Learning Disabilities Team
- Substance Misuse Team
- Mental Health Team
- Supporting People Team
- Community Support Services
- Children with Disability Team
- Adult Accommodation Teams (Supported living, Shared lives and Respite)
- Commissioning Team
- Residential & Day Care Services
- Home Assistance & Reablement Team (HART)
- Joint Hospital Discharge Team
- Adult Safeguarding/POVA Team
- Client Finances Team

In addition to the above the following teams may also have access to your information:

- Caerphilly County Borough Council Housing Department – if you are a CCBC Housing tenant and the support you require is housing related
- South East Wales Emergency Duty Team - If referral is made out of hours
- Complaints and Information Team - If the case escalates to a complaint
- Legal Services - If the case involves the court process
- Council Tax / Benefits Team – in order to check your eligibility for a subsidised charge for the service
- Financial Services Team - If your case is being assessed for financial assessment
- Insurance Services - If there is a claim against the Authority
- Health & Safety Team - If a risk assessment is required
- Corporate Finance/ Internal Audit teams - If an audit is required

Details of any sharing of your information within Caerphilly County Borough Council

Your information will be stored in the ARMED system and also the Welsh Community Care Information System (WCCIS), which is a joint system for providers of Social Care, Community Health and Mental Health services in Wales.

Access to your information will be controlled, allowing relevant practitioners access to the required information to support the safe delivery of care to citizens of Wales.

Details of any sharing of your information with other organisations

Our actions in response to the information received will be proportionate to the information and there may be times when we need to speak or consult with colleagues externally. This may include but not limited to:

- Emergency Services
- People nominated by you or an advocate as a personal responder
- Your GP or other healthcare professionals
- Carer or Care agencies
- Registered Social Landlord or Housing Team staff
- Alarm equipment engineers
- Translation services
- Other Local Authorities
- Department of Work and Pensions
- Court of Protection
- Utility Companies
- Family Members
- Health Authorities
- Regulatory bodies – Care Inspectorate Wales/Health Inspectorate Wales
- Legal Representatives
- Care Professionals
- Funeral Directors
- Partner agencies

Sometimes your needs will require a non-statutory intervention. In these cases a referral will be made to relevant organisations on your behalf, such as Citizen's Advice Bureau or other support groups etc.

Your personal data will be anonymised and collated into a report to share with our project support and funding partners United Welsh Housing Association, Aneurin Bevan ICF fund, Gwent Project Partners (local government), Welsh Government and TEC Cymru.

If a contract needs to be set up with an external provider, to provide a relevant service or support, all relevant information will be shared with the provider to ensure this service is successfully delivered.

All sharing of your personal data with other organisations will be carried out in compliance of data protection legislation requirements.

If you move outside of Caerphilly County Borough area your personal data may be shared with your new local authority to continue supporting you to meet your and /or your family's needs.

To view the information provided to the Welsh Government regarding people receiving social services, please click: [here](#)

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Data Protection Legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice. We will keep all your information secure, whether held electronically or paper copies. Your information will only be kept for a specific period of time, after which it will be securely destroyed according to the Directorate's Record Retention & Disposal Policy.

The nature of information we hold, will determine the length of time we hold it for.

Personal Information	<p>Electronic ARMED record: Personal Information is held in the live ARMED system for the duration of the contract and is removed from the live ARMED system immediately following the cancellation of the contract and return of the alarm equipment (If the equipment is not returned or is missing, the Telecare Manager can authorise the removal of cancelled accounts)</p> <p>ARMED create regular backups of their data which are stored for 8 years, after which time they are securely destroyed. The backups are encrypted and stored in a secure UK accredited location.</p> <p>Paper record: Information will be held on file for the duration of the contract and is securely destroyed 12 months following removal from the PNC database (excluding the VAT form)</p>
VAT forms	Held for 7 years after the account is removed from PNC
Anonymised information	<p>Anonymised versions of ARMED data captured will be retained in the ARMED system and used to feed in to future models.</p> <p>Anonymised reports, using data from ARMED and the assessment and evaluation information gathered during and at the end of the trial, will be retained by CCBC and will be shared with its support and funding partners United Welsh Housing Association, the Aneurin Bevan ICF fund, Gwent Project Partners (local government) & Welsh Government.</p> <p>Anonymised reports may be retained by TEC Cymru to publish on their website to help other organisations looking at this and similar technology.</p>

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.
To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints

Summary Privacy Notice

How we will use your information

Caerphilly County Borough Council's ARMED Service will gather and store various health, wellbeing and activity data that will be subject to predictive modelling through the ARMED system which will identify risk traits. This will enable early intervention and reduce the risk of the participants experiencing a fall. We will also store personal information about you so that we can support you should the system identify a potential risk. We will also gather and store information so that we can evaluate the service.

In order to support you we may need to share information your information with other Caerphilly County Borough Departments (for example, Social Services or Housing) and / or relevant external organisations (for example, Emergency Services, Healthcare professionals, carer agencies, other local authorities) and / or people nominated by you or an advocate as a personal responder.

We will keep all your personal information secure, and it will only be kept for a specific period of time. Further details on how long we will keep your information are provided in the link below.

Anonymised information and reports will be created by CCBC and shared with our support and funding partners including, United Welsh Housing Association, Aneurin Bevan ICF fund, Gwent Project partners (local governments), Welsh Government.

Anonymised reports may be published by TEC Cymru on their website to help other organisations looking at this and similar technology.

Anonymised reports, using data from ARMED and the assessment and evaluation information gathered during and at the end of the trial, will be retained by CCBC and will be shared with its support and funding partners United Welsh Housing Association, the Aneurin Bevan ICF fund, Gwent Project Partners (local government) & Welsh Government.

You have a number of rights in relation to the information held about you including the right of access to information we hold and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link:

[{Hyperlink to Full Privacy Notice on our website}](#)