

## **Privacy policy**

At Smile Care Agency, we respect your privacy and are committed to protecting your personal information. This policy explains how we collect information, what we do with it and what controls you have over your personal information.

Please also refer to our Terms and Conditions for more information.

### **Your privacy**

We take our duty to process your personal information very seriously.

We may change this document from time to time to reflect the latest view of what we do with your personal information. Please check back frequently; you will be able to see if changes have been made by the date it was last updated at the end of the document.

Refer to the sections below for more details on how and why we use your personal information:

### **Website usage**

When you are browsing our website, we have cookies in place to ensure that the website works well and provide information on how you navigate the site and the pages you visit. You will be given the option to agree to these cookies when you visit the website. To view our website you are not asked to provide any personal information.

### **When you create an account (individual)**

When you create an account to provide care for yourself or someone else, we will require some information about the account holder and the cared for person. If the cared for person is under 18, then we shall need to ensure that you have parental responsibility for that child. Creating an online account facilitates the ability to search for care and send messages, schedule visits, make payments etc. To find out more about how we use your personal information in these circumstances, please see our Client Privacy policy which can be found here.

### **When you become a carer on Smile Care Agency**

When you become a carer on the Smile Care Agency platform you will be provided with an online account. You should ensure that you do not share the login information for this account with anyone else. The online account facilitates your creation of a carer profile, the ability to apply for work and send and receive messages. Smile Care Agency will also undertake Disclosure and Barring Service (DBS) checks and Protection of Vulnerable Groups (PVG) assessments as part of our assurance processes

### **When you contact us by 'phone**

When you contact us by 'phone, our system will log the number you are calling from. If we get disconnected we may call you back to continue the conversation. If we are unavailable to take your call, there is the facility to leave a voicemail message and we will return your call as soon as possible, this may be the next day depending on the time you contact us.

### **When you contact us via email**

When you make an enquiry via email, the information in the email will only be used to respond to your request or question. We try to respond to email queries as promptly as possible, but it can take the team up to 48 hours to respond to email queries especially at busy times or on a Sunday, so please be patient with us.

### **Links to other websites**

In order to be able to provide you additional information about services we may provide links to other websites.

We suggest that you review the privacy policies for any third-party websites you visit as we cannot accept any liability for the way they manage your personal information.

### **The information we need.**

Smile Care Agency is what's known as the 'data controller' of the personal information you provide to us. Your relationship with us determines how much information we collect from you. We will only ever collect the information needed to provide you with advice and services.

We will be very clear with you about the reason for collecting information and how we intend to use, share and store that information at the point we collect it.

### **Collecting your personal information**

We collect personal information about you through a variety of different methods including when you:

Ask for more information

Share your care needs

Become a carer

Send us correspondence via email

Contact us by telephone

Give us feedback

The Smile Care Agency website is not intended for use by anyone under 16. If you are under 16, please arrange for a parent/guardian to manage an account on your behalf before sending any personal information to us.

### **Sharing your information**

In order to provide you with the services requested, we may need to share your information with service providers. We have agreements in place to protect your information and ensure that it is kept securely and confidentially and only used for the purposes of a consultation.

Other than in the following circumstances, we do not share your information with any other organisations or individuals unless we are obliged to by law, for purposes of national security or criminal investigations:

#### **If you have agreed that we may do so**

If we sell the business – the new owner may obtain client and carer information. This information would only be used for the same purposes for which it was originally obtained.

If we run an event in partnership with other named organisations, your details may need to be shared.

And we will never sell or rent your personal information to other organisations.

### **Retaining your information**

We hold your information only as long as necessary for each reason that we use it. For example, when you become a client, we will retain invoicing information for up to seven years for accounting purposes. During the retention period we ensure the security and integrity of the information.

### **What are your rights?**

You have a number of rights about how the personal information you provide can be used. These are:

Transparency over how we use your personal information (right to be informed).

The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).

Update or amend the information we hold about you if it is wrong (right of rectification).

Ask us to stop using your information (right to restrict processing).

Ask us to remove your personal information from our records (right to be ‘forgotten’).

Object to the processing of your information for marketing purposes (right to object).

Obtain and reuse your personal information for your own purposes (right to data portability).

Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you wish to raise a complaint about how we have handled your personal information, you can contact us, and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may complain to the Information Commissioner’s Office (ICO).

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner’s Office website.

### **How to contact us**

If you wish to talk through anything in our privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact us by emailing [info@smilecareagency.com](mailto:info@smilecareagency.com) and we will be happy to help.

### **About Us**

Smile Care Agency Ltd is registered with the Information Commissioner’s Office as a Data Controller. Our registration number is

Smile Care Agency Ltd is a company registered in Scotland under registration company number: SC578172 whose registered office is 272 Bath Street, Glasgow, G2 4JR, Scotland.

### **Carer Privacy Notice**

#### 1. INTRODUCTION

Smile Care Agency Ltd (“Smile Care Agency”, “we” or “us”) take the privacy and security of your personal information very seriously.

In this privacy notice, we set out how we collect and use your personal information before, during and after your working relationship with us, in accordance with data protection legislation.

We may update this notice at any time and we may provide you with additional privacy notices from time to time.

#### 2. PERSONAL INFORMATION THAT WE PROCESS

Personal information means any information about an individual from which that person can be identified. It does not include anonymous information where the identity has been removed.

There are “special categories” of more sensitive personal information which require a higher level of protection such as health information, ethnicity or religious beliefs.

We may collect, store, and use the following categories of personal information about you:

#### ***Personal contact details***

Such as name, title, addresses, telephone numbers, and personal email addresses

#### ***Photo for your profile***

Skills, work history and experience provided as part of your application and building your profile.

## **Gender**

Disclosure and Barring Service (DBS) and Protecting Vulnerable groups (PVG) Scheme checks.

Passport, driving licence or other form of identification.

## **Payment information**

Information about your use of our information and communications systems including any notes or chats or app usage information.

We may also collect, store and use the following “special categories” of more sensitive personal information:

Information about health, including any medical condition, health and sickness.

If you decide not to provide us with certain personal information that we have requested, we may not be able to perform the services requested. We may from time to time use your personal information without your knowledge or consent where this is required or permitted by law.

### **3. HOW WE COLLECT PERSONAL INFORMATION**

We collect personal information through the signup process directly from you.

We may collect further personal information during the course of providing our services.

### **4. HOW WE USE YOUR PERSONAL INFORMATION**

We will only process your personal information if we have a lawful ground for processing such information. Most commonly, we will use your personal information in the following circumstances:

Where you have freely provided information (consent).

Where we need the information to perform the contract between us or any other contract between us.

Where we need the information to comply with a legal obligation.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, but these are not likely:

Where we need to protect your interests (or someone else’s interests).

Where it is needed in the public interest or for official purposes.

### **5. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL INFORMATION**

We will process your personal information for the following purposes:

Registering you on the platform and creating your profile

Confirming your identity

Ensuring you have access to your account area for scheduling visits, making notes and selecting clients.

Invoicing you or your organisation for the care provided

To prevent fraud.

To monitor your use of our information and communication systems.

Enabling you to send and receive messages.

Enabling you to schedule, reschedule and cancel visit to clients.

Enabling you to report on the work that you have undertaken.

Enabling you to respond to potential clients.

Ensuring safeguarding for the benefit of clients or the person who is receiving the care.

Addressing complaints, questions and feedback.

Investigating disputes and other issues.

Troubleshooting technical problems.

Communicating with you by email, telephone, or text messages.

Improving our services.

Identifying and preventing privacy breaches.

Informing you of changes to our privacy policy.

If you wish to opt-out of promotional e-mails, text messages, or other communications, you may opt-out by following the unsubscribe link or by contacting Smile Care Agency directly.

#### 6. HOW WE USE SPECIAL CATEGORY INFORMATION

“Special categories” of sensitive personal information require higher levels of protection than non-sensitive information. We will only process special category information such as health information when we specifically obtain consent from you.

#### 7. TRANSFERS TO THIRD PARTIES

We may have to share your personal information with third parties, including third-party service providers for example because it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Third party providers may carry out the following services: invoicing, call centre, online platform.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

We require third parties to respect the security of your information and to treat it in accordance with the law. They must act only in accordance with our instructions and they agree to keep your personal information confidential and secure.

#### 8. TRANSFERS OUTSIDE OF THE UK/EEA

We may transfer your personal information outside the UK/EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

Where we transfer your personal information to countries where there is no adequacy decision in respect of that country, we will put in place certain measures to ensure that your personal information does receive an adequate level of protection, such as contractual clauses that have been approved by the Information Commissioner’s Office.

#### 9. INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected information security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### 10. INFORMATION RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We delete information about you, where required to by law and on your direct request. We also remove information that we consider inappropriate or no longer relevant, at our sole discretion.

## 11. WHAT ARE YOUR RIGHTS?

You have a number of rights about how the personal information you provide can be used. These are:

Transparency over how we use your personal information (right to be informed).

The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).

Update or amend the information we hold about you if it is wrong (right of rectification).

Ask us to stop using your information (right to restrict processing).

Ask us to remove your personal information from our records (right to be ‘forgotten’).

Object to the processing of your information for marketing purposes (right to object).

Obtain and reuse your personal information for your own purposes (right to data portability).

Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you wish to raise a complaint about how we have handled your personal information, you can contact us, and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may complain to the Information Commissioner’s Office (ICO).

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner’s Office website.

## **Client Privacy Notice**

### 12. INTRODUCTION

Smile Care Agency Ltd (“Smile Care Agency”, “we” or “us”) take the privacy and security of your personal information very seriously.

In this privacy notice, we set out how we collect and use your personal information before, during and after your client relationship with us, in accordance with data protection legislation.

We may update this notice at any time and we may provide you with additional privacy notices from time to time.

### 13. PERSONAL INFORMATION THAT WE PROCESS

Personal information means any information about an individual from which that person can be identified. It does not include anonymous information where the identity has been removed.

There are “special categories” of more sensitive personal information which require a higher level of protection such as health information, ethnicity or religious beliefs.

We may collect, store, and use the following categories of personal information about you and/or the cared for person:

Personal contact details such as name, title, job title (organisational accounts) addresses, telephone numbers, and personal email addresses

Payment information

Information about your use of our information and communications systems including any notes or chats or usage of the app.

Gender of cared for person.

Age of cared for person.

Usage notes or reports

Communications you have with carers and potential carers.

We may also collect, store and use the following “special categories” of more sensitive personal information:

Information about health, including any medical condition, health and sickness records for the cared for person.

If you decide not to provide us with certain personal information that we have requested, we may not be able to perform the services requested. We may from time to time use your personal information without your knowledge or consent where this is required or permitted by law.

#### 14. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information through the signup process either directly from you or where the care is for another individual from the individual or organisation with responsibility for seeking care on their behalf.

We may collect further personal information during the course of providing our services.

#### 15. HOW WE USE YOUR PERSONAL INFORMATION

We will only process your personal information if we have a lawful ground for processing such information. Most commonly, we will use your personal information in the following circumstances:

Where you have freely provided the information (consent).

Where we need the information to perform the contract between us or any other contract between us.

Where we need the information to comply with a legal obligation.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, but these are not likely:

Where we need to protect your interests (or someone else’s interests).

Where it is needed in the public interest or for official purposes.

#### 16. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL INFORMATION

We will process your personal information for the following purposes:

Registering you on the platform and creating a profile for the cared for person

Ensuring you have access to your account area for scheduling visits, making notes and selecting carers.

Invoicing you or your organisation for the care provided

To prevent fraud.

To monitor your use of our information and communication systems

Enabling you to send and receive messages.

Enabling you to schedule, reschedule and cancel services.

Enabling you to rate and review the service.

Enabling you to report on the work that has been done.

Enabling you to recruit carers.

Ensuring safeguarding for the benefit of clients or the cared for person.

Addressing complaints, questions and feedback.

Investigating disputes and other issues.

Troubleshooting technical problems.

Communicating with you by email, telephone, or text messages.

Improving our services.

Identifying and preventing privacy breaches.

Informing you of changes to our privacy policy

If you wish to opt-out of promotional e-mails, text messages, or other communications, you may opt-out by following the unsubscribe link or by contacting Smile Care Agency directly.

#### 17. HOW WE USE SPECIAL CATEGORY INFORMATION

“Special categories” of sensitive personal information require higher levels of protection than non-sensitive information. We will only process special category information such as health information, if such processing is required to help treat or manage the health of the cared for person, or when we specifically obtain consent from you.

#### 18. TRANSFERS TO THIRD PARTIES

We may have to share your personal information with third parties, including third-party service providers for example because it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Third party providers may carry out the following services: invoicing, carer duties.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

We require third parties to respect the security of your information and to treat it in accordance with the law. They must act only in accordance with our instructions and they agree to keep your personal information confidential and secure.

#### 19. TRANSFERS OUTSIDE OF THE UK/EEA

We may transfer your personal information outside the UK/EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

Where we transfer your personal information to countries where there is no adequacy decision in respect of that country, we will put in place certain measures to ensure that your personal information does receive an adequate level of protection, such as contractual clauses that have been approved by the Information Commissioner’s Office.



## 20. INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected information security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 21. INFORMATION RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We delete information about you, where required to by law and on your direct request. We also remove information that we consider inappropriate or no longer relevant, at our sole discretion.

## 22. WHAT ARE YOUR RIGHTS?

You have a number of rights about how the personal information you provide can be used. These are:

Transparency over how we use your personal information (right to be informed).

The ability to request a copy of the information we hold about you, which will be provided to you within one month (right of access).

Update or amend the information we hold about you if it is wrong (right of rectification).

Ask us to stop using your information (right to restrict processing).

Ask us to remove your personal information from our records (right to be 'forgotten').

Object to the processing of your information for marketing purposes (right to object).

Obtain and reuse your personal information for your own purposes (right to data portability).

Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you wish to raise a complaint about how we have handled your personal information, you can contact us, and we will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal information in accordance with the law, you may complain to the Information Commissioner's Office (ICO).

If you would like to know more about your rights under data protection law, you can find out more at the Information Commissioner's Office website.

### **Adult Safeguarding Policy**

*The policy is based on national guidance and The Care Act 2014*

Introduction:

This policy is to make sure that Smile Care Agency has all the right things in place to protect and safeguard adults.

Smile Care Agency believes in protecting an adult's right to live in safety, free from abuse and neglect. This policy sets out the roles and responsibilities of Smile Care Agency in working together in promoting

the adult's welfare and safeguarding them from abuse and neglect. Smile Care Agency employees and Approved Smile Care Agency self-employed carers should be made aware of how this policy can be accessed.

This policy and related procedures are applicable employees and Smile Care Agency carers. Failure to comply with the policy and related procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

#### *Care Act 2014 Definition of an Adult at Risk of Abuse:*

Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there)

- (a) Has needs for care and support (whether or not the authority is meeting any of those needs),
- (b) Is experiencing, or is at risk of, abuse or neglect, and
- (c) As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

#### **Safeguarding as Part of the Deal:**

In safeguarding adults, Smile Care Agency is committed to the principles of the Care Act 2014

#### **Key Principles of Adult Safeguarding:**

In the safeguarding of adults, Smile Care Agency is guided by the six key principles set out in The Care Act 2014 and Making Safeguarding Personal. Smile Care Agency aims to demonstrate and promote these six principles in our work:

*Empowerment* – People being supported and encouraged to make their own decisions and informed consent.

*Prevention* – It is better to take action before harm occurs.

*Proportionality* – The least intrusive response appropriate to the risk presented.

*Protection* – Support and representation for those in greatest need.

*Partnership* – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.

*Accountability* – Accountability and transparency in delivering safeguarding.

#### **Recognising the signs of abuse:**

Employees and carers are well-placed to identify abuse the adult may say or do things that let you know something is wrong. It may come in the form of a disclosure, complaint, or an expression of concern. Everyone within the organisation should understand what to do, and where to go to get help, support and advice.

#### **Types of Abuse:**

The Care Act 2014 defines the following ten areas of abuse. Smile Care Agency also includes self-neglect as an additional category. These are not exhaustive but are a guide to behaviour that may lead to a safeguarding enquiry. This includes:

*Physical abuse* – Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

*Domestic Violence/ Domestic Abuse* – Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

*Exploitation*- Including sexual and/or criminal exploitation.

*Sexual abuse* – Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

*Psychological abuse* – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

*Financial or material abuse* – Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

*Modern slavery* – Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

*Discriminatory abuse* – Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.

*Organisational abuse* – Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example or in relation to care provided in one's own home. This may range from one off incidents to long-term ill treatment. It can be through neglect or poor professional practice because of the structure, policies, processes or practices within an organisation.

*Neglect and acts of omission* – Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

*Self-neglect* – This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

### **Radicalisation to Terrorism:**

The Government through its PREVENT programme has highlighted how some adults may be vulnerable to exploitation and radicalisation and involvement in terrorism. Signs and indicators of radicalisation may include:

Being in contact with extremist recruiters.

Articulating support for violent extremist causes or leaders.

Accessing violent extremist websites, especially those with a social networking element.

Possessing violent extremist literature.

Using extremist narratives to explain personal disadvantage.

Justifying the use of violence to solve societal issues.

Joining extremist organisations.

Significant changes to appearance and/or behaviour.

### **Reporting Concerns:**

Any Smile Care Agency employee or Smile Care Agency carer who becomes aware that an adult is or is at risk of, being abused must raise the matter immediately with Smile Care Agency's head office on 01387 730766. If the adult requires immediate protection from harm, they should immediately contact the police and the appropriate adult social care department of the appropriate local authority.

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements no one should assume that someone else will do it.

### **Safe Recruitment & Selection:**

Smile Care Agency is committed to safe employment and safe recruitment practices, that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them.

Smile Care Agency has policies and procedures that cover the recruitment of all employees and Smile Care Agency self-employed carers. To See the policy please contact us.

Is there a Person in a Position of Trust Involved?

In any instance of safeguarding, consideration must be given as to whether an allegation has been made against a person in a position of trust (PiPoT) and who may be a risk to others. This can be anyone from a formal employee or approved Smile Care Agency self-employed carer to an informal carer/family member/friend or other professionals.

### **Training and Awareness:**

Smile Care Agency will ensure an appropriate level of safeguarding training is available to all its employees, and that all approved Smile Care Agency self-employed carers have provided evidence of their training certificates and any relevant persons linked to the organisation who requires it (e.g., contractors).

For all employees or Approved Smile Care Agency self-employed carers who are working with adults at risk, this requires them as a minimum to have awareness training that enables them to:

Understand what safeguarding is and their role in Safeguarding Adults.

Recognise an adult potential in need of safeguarding and act.

Understand how to report a safeguarding Alert.

Understand dignity and respect when working with individuals.

Have knowledge of the Safeguarding Adults Policy.

Similarly, employees and Approved Smile Care Agency self-employed carers may encounter concerns about the safety and wellbeing of children/young people. For more information about children's safeguarding, refer to Smile Care Agency Children and Young People's Safeguarding Policy.

### **Mental Capacity:**

The MCA defines someone is lacking capacity, because of an illness or disability such as a mental health problem, dementia or a learning disability, who cannot do one or more of the following four things:

Understand information given to them about a particular decision.

Retain that information long enough to be able to make the decision.

Weigh up the information available to make the decision.

Communicate their decision. Refer to the Mental Capacity Act Code of Practice, <https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>. Smile Care Agency will seek to involve an advocate if the person lacks capacity to make decisions about a safeguarding concern.

### **Confidentiality and Information Sharing:**

Smile Care Agency expects all employees and Approved Smile Care Agency self-employed carers to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if an adult is deemed to be at risk of harm or contact the police if they are in immediate danger, or a crime has been committed. For further guidance on information sharing and safeguarding please contact the Smile Care Agency head office.

### **Recording and Record Keeping:**

A written record must be kept about any concern regarding an adult with safeguarding needs. This must include details of the person involved, the nature of the concern and the actions taken, decision made and why they were made.

All Smile Care Agency records are securely and confidentially stored in line with General Data Protection Regulations (GDPR).

### **Whistleblowing:**

Smile Care Agency is committed to ensuring that employees and Approved Smile Care Agency self-employed carers who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation.

Police

Emergency – 999

Non-emergency – 101

Telephone: 0808 2000 247

<https://www.nationaldahelpline.org.uk/>

### **Modern Slavery Statement**

Smile Care Agency Ltd and its trading subsidiaries Smile Care Agency, is committed to the highest standards when dealing with employees, customers, and suppliers, aiming to conduct every aspect of our business with honesty, integrity and openness. We will continue to review and seek feedback on our practices, to meet these standards.

#### **Key elements that we consider:**

##### *Our policy*

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We have a defined clear policy for our staff and expect this to be adhered to, always. The policy is communicated to all staff, through on boarding and inductions, to encourage them to act responsibly. In particular our focus is on our carers and how they are approved.

##### *Risk management*

We have identified that our greatest potential risks in relation to modern slavery exist in our carer recruitment and possibly in parts of our supply chain. A risk management approach has been taken to help us identify and understand the potential risks and to ensure we can respond appropriately to any challenges. We will continue to review this approach and seek to strengthen our processes.

##### *Awareness*

At Smile Care Agency, we recognise our responsibility to ensure staff are aware of the reality of modern slavery in the UK and worldwide. We provide online and induction training that enables staff to recognise and respond to any instances of modern slavery – during work time or otherwise. The Smile Care Agency Modern Slavery Statement will be reviewed annually.

This Statement has been approved and signed by the Director on behalf of the organisation.

31<sup>st</sup> March 2024