



GDPR POLICY

LJM Homecare - Lincoln

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Policy Outline

LJM Homecare Lincoln needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organization has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards.

GDPR Policy

Why This Policy Exists

This data protection policy ensures:

- Compliance with data protection law and following good practice.
- Protection of the rights of staff, customers and partners.
- Open and transparency of how individual's data is stored and proceed.
- Protection from the risk of a data breach.

Data Protection Law

The Data Protection Act 1998 describes how organisations must collect, handle and store personal data.

These rules apply regardless of whether data is stored electronically, on paper or on any other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully.
- Be obtained only for specific, lawful purposes.
- Be adequate, relevant and not excessive.
- Be accurate and kept up to date.
- Not be held for any longer than necessary.
- Be processed in accordance with the rights of data subjects.
- Be protected in appropriate ways.
- Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

Data Protection Risks

This policy helps to protect LJM Homecare Lincoln from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with LJM Homecare Lincoln has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

The following roles will have additional key responsibilities:

Director - Lindsay Nearn

- The Directors are ultimately responsible for ensuring that LJM Homecare Lincoln meets its legal obligations.

Data Protection Officer - Anthony Lake

- Keeping the directors updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the individuals covered by this policy.
- Handling data protection questions from staff and any other individual covered by this policy.
- Dealing with requests from individuals to see the data LJM Homecare Lincoln holds about them. (Known as 'Subject Access Request')
- Checking and approving and contracts or agreements with third parties that may handle the company's sensitive data.

The Manager - Alyson Elvidge

- Approving any data protection statements attached to communications. Such as emails and letters.
- Addressing any data protection queries from journalists or media outlets. Such as newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

External Agencies - F5 Computing - Care Planner - ITS Brill Team

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning correctly.
- Evaluating third-party services the company is considering using to store or process data. Such as cloud computing services.

General Staff Guidelines

- The data held by LJM Homecare Lincoln should only be accessed by those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- LJM Homecare Lincoln will provide GDPR training to all employees as a mandatory training requirement to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines outlined in this policy.
- Employees will ensure that all sensitive documents and systems are secured with strong passwords. A strong password will be over eight characters long and contain lower and upper case, numbers and symbols. Password must never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it found to be out of date. If the data is no longer required, it should be deleted or disposed of securely.
- Employees should request help from their line manager or data protection officer if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manger or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed:

- When not in use, paper documents or files should be kept in a locked draw or filing cabinet.
- Employees should make sure paper documents and printed documents are not left where unauthorised people can see them.
- Paper documents and printed document should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (such as CD or USB), these should ne kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office spaces.

- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices such as tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

Data Use

Personal data is of no value to LJM Homecare Lincoln unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft. When data is in use the following must be adhered to:

- When working with personal data, employees should ensure that the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorized external contacts securely.
- Personal data should never be transferred outside of the European Economic Area.
- Employees should not save copies of personal data to their own computers. Always access and update the central copy of any data.

Data Accuracy

The law requires LJM Homecare Lincoln to take reasonable steps to ensure data is kept accurate and up to date.

LJM Homecare Lincoln will ensure that greater effort is put into maintaining the accuracy of personal data when the accuracy of the personal data is deemed to be more important.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure that data is updated. Such as, confirming a customers details when they call.
- LJM Homecare Lincoln will make it easy for data subjects to update the information LJM Homecare Lincoln holds about them.
- Data should be updated as inaccuracies are discovered. Such as, removing inactive phone numbers.
- It is the managers responsibility to ensure databases are checked against industry suppression files every six months.

Subject Access Requests

All individuals who are subject of personal data held by LJM Homecare Lincoln are entitled to:

- Ask what information LJM Homecare Lincoln holds about them and why.
- Ask how to gain access to information held.
- Be informed how to keep the information held up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts LJM Homecare Lincoln requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at tony@ljm-homecare-lincs.net. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will not be charged per subject request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing Data for Other Reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the individual to whom the data is about.

Under these circumstances, LJM Homecare Lincoln will disclose the requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Registered Manager, Directors and from LJM Homecare Lincoln's legal advisers where necessary.

Providing Information

LJM Homecare Lincoln aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used.
- How to exercise their rights.

To these ends, LJM Homecare Lincoln has a privacy statement, setting out how data relating to individuals is used by the company.