

Data Protection Policy



Focus

Empowering individuals
to live independent lives

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1. INTRODUCTION

1.1 Statement of Commitment

Focus Independent Adult Work CIC is committed to respecting and protecting the privacy and rights of individuals whose personal data we handle, and to complying with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 in all aspects of our work. This policy outlines how Focus adheres to the GDPR and the Data Protection Act 2018 when collecting and processing personal information.

1.2 Purpose

This policy outlines how Focus Independent Adult Work CIC adheres to the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when collecting, processing, storing, sharing and disposing of personal data. This policy aims to safeguard the rights and privacy of individuals whose personal data is handled by Focus, and to provide a framework for good practice in data protection. This policy applies to all staff, volunteers, contractors, partners and other parties who process personal data on behalf of Focus. This policy will be regularly reviewed to ensure its effectiveness and compliance with the law. This policy will be accessible to all staff and published on Focus's website.

1.3 Background

Focus needs to collect personal information about people with whom it deals in order to carry out its business and provide its services. Such people include service users, their family members, employees (present, past and prospective), suppliers and other business contacts. This information includes name, address, email address, date of birth, private and confidential information, sensitive information. We also record certain phone calls. No matter how it is collected, recorded and used (digitally or on paper) this personal information must be dealt with properly to ensure compliance with the Data Protection Act 2018

The lawful and proper treatment of personal information by Focus is extremely important to the success of Focus and in order to maintain the confidence of service users, carers and employees. Focus will ensure it treats personal information lawfully and correctly.

1.4 Data Protection Principles

Focus fully supports and complies with the seven principles of the UK General Data Protection Regulations (GDPR) which are summarised below.

Personal data:-

- Shall be processed lawfully, fairly and in a transparent manner
- Be obtained / processed for specific purposes
- Must be adequate, relevant and limited to what is necessary
- Must be accurate and kept up to date
- Shall not be kept for longer than necessary
- Shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage,
- Shall be processed with accountability. Focus must have appropriate measures and records in place as proof of compliance with the data processing principles.

1.5 Scope

This Policy applies to all members of staff, students, placement, agency staff, volunteers, contractors and sub-contractors and any other person representing or acting on behalf of Focus.

2. ROLES AND RESPONSIBILITIES

2.1 Director of Client Finance & Data

The Director of Client Finance and Data will be responsible for:-

- Ensuring training is in place for those who handle personal information
- Providing a clear line of report and supervision for compliance with data protection
- Ensure any Focus notifications to the Information Commissioner is updated to take account of any changes in processing of personal data
- Ensure appropriate Data Protection procedures are in place

2.2 Employees

All employees will:-

- Participate in mandatory training
- Observe all guidance and procedures regarding the collection and use of personal information
- Collect and process appropriate information only in accordance with the purposes for which it is to be used by Focus to meet its responsibilities
- Ensure information is accurately recorded onto Focus systems
- Ensure the information is destroyed when it is no longer required (in accordance with the Data Protection Act 2018 and the NHS Code of Practice)
- On receipt of a request for information held about them notify the Information Governance Team who will initiate the Subject Access to Request (SARs) procedure.
- Understand that breaches of this policy may result in Disciplinary action including dismissal.

3. POLICY REVIEW

This policy will be reviewed within a three year period as part of a rolling programme unless there are any changes in legislation.

4. REFERENCES

UK GDPR
Data Protection Act 2018
Subject Access to Records Procedure (ICO Guidance)
NHS Code of Practice
Social Care Record Guarantee