

<b>Policy name</b>	Confidentiality, privacy notice, data protection for staff and and the UK-GDPR (Uploaded on the NHS tool kit)
<b>Author</b>	
<b>Date reviewed</b>	04.02.21

Version	Reviewed by	Revision made
1.4	Rebecca Cork	Amended to UK-GDPR

This policy has been created to ensure safeguarding and preserving privacy of personal data.

Trust is an integral part of our ability to provide consistent high standards of care and as such it must not be broken.

A person's trust is not a right but a special privilege, which means you must exercise care and thought in your handling of confidences. You must never divulge a confidence placed in you by a person we support, colleague, relative or professional.

Only where the nature of the confidence may have a detrimental impact upon the standard of care would you consider passing it on and then only to the Registered Manager, never anyone else.

The Registered Manager will determine the best way to handle the matter. These high standards of confidentiality apply just as much to information recorded in support plans and client records.

Breach of confidence may constitute gross misconduct and as such may lead to dismissal.

This does not affect your right regarding whistleblowing, for which we have a separate policy, which protects your right to expose unsound practice without detriment to yourself.

If confidentiality is breached in connection with a person we support, then the person breaching may be reported to Social Services. Social Services contact number is 0300 111 8000.

**The use of mobile phones to take photos of the people we support is prohibited unless if there is ever a need permission should be sort from a manager the photo sent to the relevant staff strictly management staff which are activities coordinator, managers or a team leader. Also, the people we support must agree to this. The photo must be deleted straight after it is taken and deleted section in the phone of the photos and sent to one of the management team and this must be company email of phone. If sent via own personal email again this email must be deleted and deleted out of the deleted emails section. Only do this if you are**



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

**confident how to do this. It is preferred to borrow the company Nikon camera or company on call phone.**

Staff to use the company camera to take photos the activity coordinator has a Nikon camera for professional's photos.

Memory sticks, lap tops and data storage must not hold any people we support information and any company information and staff personal data. Although no data is stored on portable equipment a loss must be reported to a manager along with any computers out of the office. The Manager will consult with Peninsula on the best course of action.

The company email must only be used by management.

Staff are not permitted to put their place of work or the company the work for on any social media sites.

Staff are also not permitted to put photos on social networking sites that are related to the company.

Staff should also not discuss incidents with anyone outside of the company there is always two sides to a situation this is breaching company confidentiality and causes the company to possibly have a negative reputation. For example, friends or relatives hearing one side to the story then posting comments on social media of which of course the company cannot discuss with an outsider so then they are not making informed decisions or comments. Staff must report any known breaches of confidentiality they must disclose any concerns at all about this.

The people we support pictures cannot be used for any marketing or competition entries. Pictures of the care home environment and staff are permitted, providing staff give permission for this. Bedrooms that are occupied photos cannot be used however unoccupied bedrooms photos can be used. This is to respect people's privacy and dignity who are using the care home.

Staff cannot store any personal information on phones.

No authorized persons can access the building, the people we support rooms and also the offices. To prevent any breaches in physical security staff must ensure all doors are closed behind them and the activity coordinator must ensure that the art room is locked after use staff should also. Managers must always lock their office when the office is left unoccupied. The rest of the house the doors automatically lock from the exterior when closing the door. Staff must be present at all times with any contractors working. Staff must not divulge access codes to the home or buildings. No employee should leave keys around for them to be copied.



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

No employee can divulge passwords to any log ins associated with the company. If a password is suspected to be found then this must be reported to a manager and the password amended immediately. No data is permitted to be transferred out of the UK. Any staff remote working can only work on the cloud based passworded system no documents can be downloaded and saved they must be deleted when finished with.

The business is a small business and the owners and managers are aware of all the assets with personal details on them such as computers therefore any missing it would be known straight away. Any employee must report any item missing. There is no asset list kept as such however the accountant keeps a record of larger assets on the accounts. The same is for monitoring system policy and information labeling policy these are not applicable due to the company being a small business.

Data can be transferred via post or email.

Depending on sensitivity it is password protected or sent by recorded delivery. The company affords transferring data unless absolutely necessary.

Emails that are sent out and letters are for the purposes of supporting the people we support and also smooth running of the home. The managers decide who is appropriate to receive personal data it is sent on a need to know basis. Any doubt peninsula employment law are consulted. If data is sensitive then the email should be encrypted or sent by recorded delivery.

Every two years staff training is up dated in confidentiality and UK-GDPR.

The company must alter passwords every twelve weeks.

### **Personal data that the company holds**

All staff personal details in connection with employment

All the people we support needs and wishes to enable the company to support that individual, and personal details such as date of birth.

Potential referrals and employees

Agency staff information

Contractors information

Potential clients and potential staff

Data that is relevant for the business to function no additional data should be stored and kept all data kept should be justified. For example it is necessary to know a person we support has an allergy.

We do not sell or lease customer or staff information.



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

**To protect personal data the company will change passwords every year on the following systems.**

**HR online**  
**The office 365 email and all outlook email accounts**  
**NMDS**  
**CCTV**  
**Red funnel ferry log in**  
**Quiq cloud**

**Please note do not send client personal data on staff email accounts including the mount staff hot mail account to many staff have access to this.**

### **How we communicate personal data**

On paper in the offices that are locked and secure in client files.

Client files must be locked away.

Client files cannot go in communal areas.

Staff files can be moved for supervisions but must stay with the supervisor and put straight back in the office.

Client files cannot travel in cars unless in a secure locked box and needed for management reasons that can be justified.

Staff files cannot travel in cars unless in a secure locked box and needed for management reasons that can be justified.

We do not enter personal information in the communication book we write the book to refer to a document and where it is.

We communicate personal data via encrypted email.

We communicate information verbally.

Unnecessary personal details are not put on invoices such as full name and date of birth if possible use client ID that the council sends.

### **Where is personal information stored**

Personal information is stored in secure locked offices the business manager home office, the managers office at The Mount for staff records.

The staff office for the people we support records.

Archive records are securely stored in a locked room at the mount care home.

Other digital records are stored on the computers used by the management team only which are securely password protected.

No data can be stored on hard drives that are movable.



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

Anything that needs to be emailed will be emailed via encryption. If this is not possible information to be sent via recorded delivery first class post.

The rooms that are used for personal data should be kept locked when not in use. The rooms should never be un locked and unoccupied.

### **Information that is disposed off.**

All personal information is disposed off by a reputable shredding company and a record is kept of what is shredded and date. The company sends a certificate through.

Computers are also disposed off through this company.

### **How long we keep personal data**

We store personal data for 8 years.

### **Individual rights.**

All individuals have a right to access their personal data we hold and to obtain information about how we process it and the right to rectify their personal information and the right to restrict information that is used. The right to data being erased. All individuals have the right to complain to the information control office.

Data is stored on the cloud only with reputable companies.

If you wish to use your individual rights, then please request this in writing to one of the managers and the reasons to one of the managers.

You have the right to complain to a manager if you believe we have not handled your information in line with legal requirements if you are not satisfied with this. You have the right to lodge a complaint to the Information Commissioners Office UK should you believe we have not handled your information in line with legislative and regulatory requirements. Tel 0303 123 1113.

### **Staff responsibilities**

To ensure the above is complied to and confidentially is kept for example client files not left lying around.

Talking in public places.

Reporting any confidentially breaches and incorrect data processing to management to investigate. All employees of Rebecca Homes Ltd are as responsible the same as managers not to pass on personal data unnecessarily.

To ensure your personal details are up dated when things change.

### **Any breaches in the above.**

Could result in disciplinary action.

The data breach would be fully investigated.



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

If a personal data breach is found we may have to report it to the ICO. The breach has to be reported when the data breach is likely to result in a risk to the rights and freedoms of individuals for example discrimination, damage to reputation, financial loss, loss of confidentiality. Where the breach is likely to cause risk to the person the person will also need to be notified by management.

To report a data breach managers to contact the ICO Tel 0303 123 1113

### **Managers responsibilities**

To review the data processing procedures from time to time to ensure everything is compliant with the UK-GDPR.

### **Free desk policy**

Staff and managers cannot leave paperwork on desks unsecured and private information up on walls this is not permitted due to people having easy access to personal data. Such as application forms on the side risk assessments on walls. If any staff see anything lying around of personal data then staff must act upon it and remove it.

### **GDPR and staff consent form**

Staff member name \_\_\_\_\_

This consent form is on behalf of Rebecca Homes Ltd, to enable Rebecca Homes Ltd to process your data for employment purposes and to carry out your duties within Rebecca Homes Ltd.

Your information has to be passed to our contractors of whom assist us with the business. The reason that third parties are provided your information is to enable the company to employ you and meet its obligations as an employer.

The third parties are as follows....

121 Book keeping who process your wages  
Peninsula employment law who assist with employment related issues  
Ellis Whittam our health and safety advisors  
Our insurance company Bollington insurance Broker and the insurance company they have sought for our company.  
The people who pay for our services the councils such as Staffordshire county council.  
CQC the care quality commission.  
The DBS service  
Vehicle insurance  
The national minimum data set



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

Pension companies the company uses

The bank

Training providers

HMRC

We need to inform the above companies and or persons in order to ensure that your employment within Rebecca Homes is supported as far as possible with wages and pensions, health and safety advice and policies, employment law advice and policies and to ensure the company is insured adequately. At times the people who buy our services may request information about our staff. Also the inspectors for the care home. CQC who inspect our home legally have to check our records and the council may from time to time have to check our records. It is Government requirement to update the national minimum data set.

### **Rebecca Homes Ltd will**

1. Will process your personal information on HR on line through peninsula to enable all relevant data saved to be employed. Will process information 121 Book keeping. Process information about you to the DBS service. Process information on the NMDS and insurance companies.
2. Maintain appropriate records for each employee.
3. Record any health conditions and sickness.
4. Record any meetings held and training.
5. Will send information when required to payroll, CQC and the insurance company.
6. Store securely employee records. This is on paper and on computer.
7. Manage legal duties.
8. Send information to HMRC
9. Provide your information to training providers when required.
10. Send your details to our bank

Rebecca Homes requires your personal data for the following reasons

1. To enable us to employ you.
2. To enable us to offer support where required such as health.
3. To enable us to match you with the correct work.
4. To have contact details including emergency contacts if there is an issue.
5. We keep personal details to enable us to contact you out of work if required.

Rebecca Homes Ltd will need to contact you via your personal email, telephone or home address the reason for this

1. To offer bank shifts



## PUTTING PEOPLE IN CONTROL

The Mount, Wood Lane, Yoxall,  
Burton on Trent, Staffs DE13 8PH  
Call 24 hours: 01543 472081 and 01543 473819  
Fax: 01543 472086  
Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)  
[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

2. To pass on information
3. To contact you about anything we believe of importance for example a shift cancelled.

Please note you can put in writing at any time to withdraw this consent.

### Confidentiality and data protection

1. All data will be kept secure. By entering into this agreement you are providing consent to sharing personal data as defined in the UK-GDPR for the following purposes.
  - a) With the local authority and its agents.
  - b) With HMRC
  - c) With other parties where required by law
  - d) With CQC
  - e) With the people paying for our services such as Staffordshire council and safeguarding
  - f) The DBS service
  - g) The company we bank with
  - h) Training providers

It is important as well staff keep their details up to date with managers and report any changes.

Please write yes or no if you agree to your picture on our website \_\_\_\_\_

If you do not agree to a picture on our website please do not accept any photos taken whilst working.

Staff please sign to say you consent to the above.

---

Please print name

\_\_\_\_\_

Please date

---

Please leave this signed letter in one of the managers trays for filling.

### Staff please read and sign

*Rebecca Homes Ltd*

**PUTTING PEOPLE IN CONTROL**

The Mount, Wood Lane, Yoxall,

Burton on Trent, Staffs DE13 8PH

Call 24 hours: 01543 472081 and 01543 473819

Fax: 01543 472086

Email: [contact@rebeccahomesltd.com](mailto:contact@rebeccahomesltd.com)

[www.rebeccahomes.co.uk](http://www.rebeccahomes.co.uk)

care home • community support • Isle of Wight holiday home • tenancies • respite

Registered address: The Mount, Wood Lane, Yoxall, Burton on Trent, Staffs DE13 8PH.

Company Registration Number 04573091. Registered with Companies House in England and Wales