

## Eden Carers Privacy Policy

Eden Carers provides Carers assessments: Information and signposting; one to one support; benefit information; newsletters, support groups including after school clubs for Young Carers; social events, training and activities. We support Carers aged 5 years and upwards.

Manual	Procedure No	Version No	Pages
AD	AD015	1	Page 1 of 5
Issue Date	Originated By	Authorised By	
21/03/18	DL	LW	

## TRUSTEE RESPONSIBILITIES

Trustees are required to familiarise themselves with the content of the data protection and subject access policy and to be aware of the associated procedure and guidance documents. The responsibility for having detailed knowledge of the procedure and guidance, and the monitoring of compliance to these documents within the organisation may be carried out by a nominated member of the board or may be delegated by them to an appropriate member of the management team.

Trustees are personally responsible for ensuring staff have safe and effective systems in place whereby staff work according to the data protection and subject access policy documents when handling personal and sensitive data.

## RESPONSIBILITIES OF MANAGEMENT

Management is responsible for having safe and effective systems in place to ensure that:

- staff follow the data protection and subject access policy, procedure and guidance when handling service user data, in order to comply with the GDPR and the Caldicott Principles
- all data is collected, processed, maintained, stored, disclosed and disposed of in accordance with the Data Protection Principles and with the conditions for lawful processing as set out in GDPR
- fair processing information (Privacy Notice – detailed in our Consent Form & Referral Forms) are issued to service users when collecting their personal data
- personal data / special categories of personal data are recorded accurately and kept only if relevant and justifiable
- personal records are properly managed, accurate, fit for purpose and remain confidential
- records are maintained demonstrating that the requirements imposed by the GDPR are being complied with, and how.

Managers are required to:

- ensure Trustees, staff and volunteers receive training in line with GDPR requirements and Caldicott Principles
- instruct staff to refer matters relating to data protection (including requests for subject access) to the Chief Officer.

When the organisation engages an external company to provide services on its behalf, (for example HR, IT services or document disposal services) and is acting as a data processor for the purposes of GDPR, then managers are responsible for ensuring that:

- the company is engaged by means of a written contract
- the company is able to provide sufficient guarantees as to the implementation of GDPR-compliant security measures
- the contract sets out the subject matter and duration of the processing, the nature and purposes of the processing, the type of personal data and categories of data subjects involved and includes the obligations and rights of the contracting organisation.

## LEGISLATION

The organisation will seek to comply with the GDPR in the way it collects, processes, maintains, stores and disposes of data, ensuring it is:

- processed lawfully, fairly, and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary for the purpose for which the data is processed
- accurate and where necessary kept up-to-date
- not kept for longer than is absolutely necessary for its given purpose
- subject to appropriate security to safeguard against unauthorised or unlawful use, destruction or damage

The organisation is also required to demonstrate how it is complying with its obligations under the GDPR, by ensuring that appropriate systems, controls and procedures are in place.

The organisation will also seek to comply with the Caldicott Principles, which apply to regulated care and support services and govern the use and management of personal information that allows an individual to be identified. The organisation will:

- be able to justify the purpose of how they use and manage such information
- not use it unless it is necessary
- use the minimum necessary amount of information
- ensure it is accessed on a strict need-to-know basis
- ensure those accessing such information are aware of their responsibilities
- understand and comply with the law
- be aware that the need to share information can be as important as the duty to protect an individual's confidentiality.

With regard to data protection and the processing of confidential information, the organisation will also, where applicable, seek to comply with:

- Access to Health Records Act 1990
- General Data Protection Regulation (GDPR) 2018
- Human Rights Act 1998
- Mental Capacity Act 2005
- Protection of Freedoms Act 2012
- Health and Social Care Act (2008)
- Care Act 2014

## Personal information that this website collects and why we collect it

This website collects and uses personal information for the following reasons:

### Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on Google's developer guides. FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

## Contact forms, email links & course registration

Should you choose to contact us using the contact form on our Contact us page or the email link on our webpage or register with for the online 'Caring with Confidence' course. All traffic (transferral of files) between our website and your browser is encrypted and delivered over HTTPS.

## How we store your personal information

As detailed above, if you submit a contact form, email or course registration via this website some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website is built on. In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual. Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

## About this website's server

This website is hosted by UKFast, who operate UK data centres that are built on best-of-breed, enterprise-grade infrastructure and combine this technology with high levels of resilience, super-fast connectivity and exceptional levels of on-site and server security.

Their external Certifications include:

- ISO 27001: Information Security Management System
- ISO 14001: Environment Management System
- ISO 9001: Quality Management System
- PCI Data Security Standards (PCI DSS)
- BSI PAS 2060: Carbon Neutral
- NIC EIC Approved Contractor

Protection of Hardware & Data includes:

- Access control
- Proximity cards
- Staffed 24/7/365 (by SIA-accredited UKFast staff)
- CCTV - internal and external
- 2.8m secure fencing and razor wire perimeter fence

- Site-specific, dedicated firewall technology
- 24hr NSOI-accredited security patrol

#### Additional Security:

Not only do we protect your data from threats, we continuously monitor and control all of our security and fire systems using a number of additional systems. These systems include: network connectivity and latency CCTV systems, cage and entry door access controls as well as the physical grounds, temperature, moisture and humidity levels in individual suites and power levels (down to individual power bars within racks). Also a permanently manned security presence at all of our data centres and use of multi-layered physical security including a secure perimeter and video surveillance.

### Our third party data processor

We use one party to process personal data on our behalf. The party has been carefully chosen and complies with the legislation set out in section 2.0. Google is based in the USA and is EU-U.S Privacy Shield compliant.

- Google (Privacy policy)

### Data Breaches

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

### Data Controller

The data controller of this website is: Eden Carers, a Company Limited by Guarantee, registered in England & Wales with company number: 4929903. Eden Carers is also a registered Charity, with number: 1101719

Eden Carers registered offices are:

The Office  
Mardale Road  
Penrith CA11 9EH  
Cumbria, UK

### Changes to our privacy policy

We review our Data Protection Policies, Procedures & Notices annually and may make changes to this Notice from time to time. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

### Change log

19/3/18 - Privacy policy instigated