**Personal Data Protection Policy**

**For Clients and Carers/Family**

**(Issue 5 dated April 24)**

**Compliance with the**

**General Data Protection Regulation**

**(GDPR)**

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| **Issue** | **Date** | **Details** |
| 1 | Sep 18 | Initial Document |
| 2 | July 19 | Reviewed and reformatted into standard ACG font with some minor amendments |
| 3 | Jan 21 | Organisation trading name change throughout |
| 4 | Jul 21 | Organisation name change throughout |
| 5 | Apr 24 | Reviewed with minor updates to ‘The Information LLCG collects from Clients’ in the Table on page 5 |
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**This policy document gives you important information about:**

* Why Later Life Choices Glenrothes (LLCG) seeks your consent to hold personal information about you;
* What personal information LLCG holds and processes;
* How LLCG looks after your personal information;
* Your rights in relation to data protection.

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1. Introduction
   1. Later Life Choices Glenrothes (LLCG) takes the security and privacy of personal information seriously. LLCG gathers, uses and stores data about you and others in the normal course of its business and the delivery of its services and to manage its relationship with you and others with whom it has dealings and come into contact with. LLCG has a duty to notify you of the information contained in this Policy.
   2. LLCG obtains, uses and stores personal information (also referred to as data), as set out in LLCG's Privacy Notices, for a number of specific lawful purposes, about job applicants, current employees, temporary workers, volunteers, suppliers, clients, carers, partners, funders and any other third parties it has dealings with.
   3. This policy sets out how LLCG complies with its data protection obligations and seeks to protect personal information relating to its clients and their families.
   4. The Centre Manager is responsible for data protection compliance within LLCG. If you have any questions or comments about the content of this policy or if you need further information, you should contact them on [info@laterlifechoicesglenrothes.org](mailto:info@laterlifechoicesglenrothes.org).

1. LLCG’s Promise to Clients and Carers/Family Members
   1. LLCG will collect and process your personal information for specified, explicit and legitimate purposes only;
   2. it will use only the personal information that it needs to support you;
   3. it will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay;
   4. it will delete your personal information when your association with the organisation is ended; and
   5. it will keep your personal information secure and protected.

1. The Legal Basis for Collecting and Using your Personal Information

**Clients**

LLCG needs to process clients’ personal data to support and communicate with you and to understand any particular needs due to disability or frailty. LLCG cannot fulfil its responsibilities to its clients without this processing. LLCG will therefore rely on clients’ **CONSENT** as the lawful basis for processing their personal data. Usually, LLCG will expect the clients themselves to make the decision on whether to give us their consent. However, where this is not possible due to a recognised cognitive impairment then the decision may be made by the person legally acting on their behalf (for example an executor or a Welfare Power of Attorney).

| **The Information LLCG collects from Clients** | **Why LLCG collects the information & what it is used for** | **Duration of Processing** |
| --- | --- | --- |
| * Full Name * Known as * Diagnosis (and type) of dementia / other memory issues * Attendance at other centres / groups? * Address * Telephone Number * Date of Birth * Referrer’s name, organisation, address, telephone number * Next of kin’s (NOK) name, address, telephone number * Referral reason (including disability/health issues and support needs * Emergency contacts’ x 2 name, relationship, address, preferred method of contact, home phone, work phone, mobile, email address (one could be same as NOK) * POA details if applicable * Keyholder / keysafe number * Service(s) referred for * Circumstances of note eg. pets/smoker in household * Info on continence/ mobility/ diet/ swallowing /food allergies/ vision/ hearing / speech / aid requirements for snack /other allergies or adverse reactions * Health support needs * Medication being brought to session * Any other support needs while attending * Transport requirements * Start Date * Signature * Photograph consent * Third party involvement permission * Info on home circumstances, other support, other services, hobbies, likes, music taste, anything else client wishes to inform of * Reason for leaving * Leaving date | * to assess potential clients meet the criteria for LLCG services * to have sufficient knowledge about clients to deliver the most relevant service(s) * to keep clients safe and comfortable when receiving LLCG services * to support clients in a person-centred way * to tailor activities / services to clients’ preferences * to ensure LLCG can contact clients’ emergency contacts in an emergency * to safeguard LLCG staff and volunteers, for example when lone working | * all information held for **6 months** after client leaves LLCG service(s) * electronic information is deleted from LLCG’s network and hard copy information is shredded or is disposed of through confidential waste bags |

**Carers/Family Members**

LLCG needs to process carers’/family members’ personal data to support and communicate with them and to understand any particular client needs. LLCG cannot fulfil its responsibilities to its clients without this processing. LLCG will therefore rely on carers/family members’ **CONSENT** as the lawful basis for processing their personal data.

| **The Information we collect from Clients’ Carers/Family Members** | **Why LLCG collects the information & what it is used for** | **Duration of Processing** |
| --- | --- | --- |
| * Name * Address * Preferred method of contact * Home phone, work phone, mobile * Email address * Relationship to client * All/any of above client data if client has diagnosis of dementia / POA in place | * to have sufficient knowledge about clients to deliver the most relevant service(s) * to keep clients safe and comfortable when receiving LLCG services * to support clients in a person-centred way * to ensure LLCG can contact clients’ emergency contacts in an emergency | * all information held for **6 months** after client leaves LLCG service(s) * electronic information is deleted from LLCG’s network and hard copy information is shredded or is disposed of through confidential waste bags |

1. Privacy Notices
   1. LLCG will issue its Privacy Notice to you when you take up one of our services, informing you about the personal information that it collects and holds relating to you, and how you can expect your personal information to be used (and for what purposes).
   2. The Privacy Notice includes a section for you to sign and return to LLCG confirming your consent for processing your personal data and, if required/desired giving your permission for LLCG staff to liaise with a family member/third party on your behalf.
   3. LLCG may issue updated Privacy Notices from time to time.
   4. LLCG will take appropriate measures to provide information in privacy notices in a concise, transparent, intelligible and easily accessible form, using clear and plain language.
2. Individual Rights
   1. You have the following rights in relation to your personal information:
      1. to be informed about how, why and on what basis that information is processed;
      2. to obtain access to it;
      3. to have data corrected if it is inaccurate or incomplete;
      4. to have data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing (this is sometimes known as 'the right to be forgotten');
      5. to restrict the processing of personal information where the accuracy of the information is contested, or the processing is unlawful (but you do not want the data to be erased), or where the organisation no longer needs the personal information but you require the data to establish, exercise or defend a legal claim; and
      6. to restrict the processing of personal information temporarily where you do not think it is accurate (and the organisation is verifying whether it is accurate), or where you have objected to the processing (and the organisation is considering whether LLCG's legitimate grounds override your interests).
   2. Please contact the Centre Manager if you wish to exercise any of these rights.
3. Individual obligations
   1. LLCG asks you to help it keep your personal information up to date. You should let the Centre Manager know if the information you have provided to LLCG changes, for example if you move to a new house or have a new contact number.
4. Information Security
   1. LLCG will use appropriate technical and organisational measures in accordance with its policies on information security to keep personal information secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.
   2. Where LLCG uses external organisations to process personal information on its behalf, additional security arrangements will be implemented in contracts with those organisations to safeguard the security of personal information.
5. Storage and Retention of Personal Information
   1. Personal information (including Sensitive Information) will be kept securely and for no longer than necessary in accordance with LLCG's Personal Data Storage & Retention Policy.
      1. Health, disability or criminal record information is deemed “sensitive” data and is collected only if considered necessary for the purposes of preventative or occupational measures to support the individual whilst associated with LLCG. No other sensitive data (as defined by the GDPR) is collected.
   2. The length of time over which data should be retained will depend upon the circumstances, including the reasons why the personal information was obtained.
   3. Personal information (and sensitive personal information) that is no longer required will be deleted permanently from LLCG’s information systems and any hard copies will be destroyed securely.
6. Training
   1. LLCG will ensure that staff are adequately trained regarding their data protection responsibilities.