



## CAMDEN CARERS CENTRE

### DATA PROTECTION POLICY AND PRIVACY NOTICE

#### POLICY STATEMENT

1. In the provision of its services, Camden Carers Centre (“**CCC**”) may receive personal data from or about carers, cared for, employees, volunteers, trustees, job applicants and others (together “**Stakeholders**”).
2. Personal data is any information that relates to a living, identifiable person. This data can include names, contact details, and other information.
3. Being controllers of personal data, CCC is responsible for how this data is processed. The word ‘process’ covers most things that can be done with personal data, including collection, storage, use and destruction of that data.
4. It is CCC’s policy that all personal data, however received, is treated in accordance with CCC’s obligations under the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”).
5. In its processing of personal data, CCC will:
  - a. comply with the law, in particular the GDPR;
  - b. respect individual’s rights and wishes;
  - c. be open and honest with the individual whose data is held;
  - d. provide training and support for staff and volunteers who handle personal data so they can act confidently and consistently in accordance with CCC’s obligations; and
  - e. store information securely, ensuring that no unauthorised persons have access to personal data.

#### WHY AND HOW PERSONAL DATA IS COLLECTED

6. CCC receives and processes personal data in order to:
  - a. contact carers and provide support and services to carers;
  - b. fulfil its contractual obligations under its contracts with local authorities and others; and

- c. maintain employment and HR records.
- 7. In relation to 6.b. above, CCC has an obligation to provide certain data (such as the number of carers on its database) pursuant to its contractual obligations with local authorities but all such data is anonymised before being provided.

## **CONSENT**

- 8. All existing Stakeholders will be informed of this policy in a written communication prior to or shortly after the enforcement of the GDPR on 25 May 2018. At times, CCC may further process data which it has already collected. CCC will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for.
- 9. When personal data is first collected from any new Stakeholders, they will be asked to give their express consent for the processing of their data and will be informed about this data protection policy, which will be stored on CCC's website.

## **SHARING OF PERSONAL DATA**

- 10. CCC does not share personal data with third parties except where:
  - a. the express consent of the individual has been obtained; or
  - b. where permitted under the GDPR.
- 11. As set out at paragraph 7 above, CCC has an obligation to provide certain data (such as the number of carers on its database) pursuant to its contractual obligations with local authorities but all such data is anonymised before being provided.

## **SECURITY AND STORAGE OF PERSONAL DATA**

- 12. The personal data of carers ("**Clients**") is confidential and may only be shared between staff, volunteers and trustees as necessary and appropriate.
- 13. Client personal data and case notes should be stored electronically on CCC's secure database. All paper records must be stored in individual client files in lockable cabinet/cupboards within CCC's offices.
- 14. Personnel records are kept securely in a lockable cabinet in the Chief Executive Officer's office and are only to be viewed by management.
- 15. Staff should always be cautious in their response to telephone enquiries and Client personal data should not be released to third parties unless consent has been obtained. When giving or receiving information by telephone, either

mobile or landline, staff should be sensitive to who may be listening and ensure the conversation remains as private and confidential as possible.

16. Computer screen displays must be located out of public view. Staff should ensure that when they are away from their desk, they log off their computer.

#### **RETENTION PERIODS AND DELETION OF DATA:**

17. Client personal data contained on CCC's database will be deleted once the case has been inactive for two years. Paper files will be shredded once the case has been inactive for two years.

18. Application forms for unsuccessful applicants to CCC will be deleted (if in electronic form) and shredded (if in paper form) after one year.

19. Employee records will be deleted (if in electronic form) and shredded (if in paper form) six years after employment has ceased.

20. Payroll and tax information will be deleted (if in electronic form) and shredded (if in paper form) after ten years.

#### **DATA PROTECTION OFFICER**

21. CCC's Chief Executive Officer, Allegra Lynch, has overall responsibility for implementing and monitoring CCC's data protection policy.

22. Under the GDPR, individuals have the following rights in relation to their personal data processed by CCC:

- a. To be informed about how their personal data is handled;
- b. To gain access to their personal data;
- c. To have errors or inaccuracies in their data changed;
- d. To have their personal data erased, in limited circumstances;
- e. To object to the processing of their personal data for marketing purposes;
- f. To restrict the processing of their personal data, in limited circumstances.

23. Any questions or concerns about this policy or the way in which personal data is held or processed should be directed to Allegra Lynch using the following contact details:

Post: Allegra Lynch, Camden Carers Centre, Charlie Ratchford Resource Centre, Belmont Street, London NW1 8HF

Email: [Allegra@camdencarers.org.uk](mailto:Allegra@camdencarers.org.uk)

24. Individuals have a right to complain to the Information Commissioner's Office (ICO) about the way in which CCC processes their personal data (<https://ico.org.uk/>).

## COOKIES ON CCC'S WEBSITE

25. Cookies are small files which websites store on a computer and which contain various types of information about a person's visit to a website. Cookies can record information about how a person browses the internet. They are not viruses or malicious software.

26. CCC does not store cookies on a person's computer without their consent, unless they have the sole purpose of carrying out the transmission of communications or they are strictly necessary for providing an online service.

27. Individuals can restrict or block cookies which are set by any website through their browser settings. Information about this can be found using the following link <https://ico.org.uk/for-the-public/online/cookies>.

28. Please note that restricting or disabling cookies may impact the functioning of parts of CCC's website.

29. CCC's website uses the following cookies:

Cookie	Name	Purpose
Session cookie	SESS<...>	When required, cookies beginning with 'SESS' are used to track an individual's persistent status, such as whether they are logged in.
Google Analytics	_ga _gid _gat	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
JavaScript	has_js	We use this cookie to track which browsers are capable of processing JavaScript. JavaScript is a scripting language which provides enhanced interactivity and visual effects.

9 May 2018