

## Data Protection Policy

September 2022

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### 1. DATA PROTECTION – OVERALL POLICY

1st Homecare fully recognises the importance of ensuring that the information it holds with regard to its clients and employees is handled appropriately. The Data Protection Act 2018 (“the Act”) sits alongside the UK General Data Protection Regulations - a UK law which came into effect on 01 January 2021 which sets out the key principles, rights and obligations for most processing of personal data in the UK. 1st Homecare fully intends to comply with its responsibilities as a data controller under the Act with regard to data processing – that is, with regard to the collection, holding, use, disclosure, retention or destruction of data regarding individuals. These responsibilities are outlined below.

In addition to this Policy, 1st Homecare’s Confidentiality Policy sets out the way in which 1st Homecare protects the confidentiality of information that it holds, and the requirements that must be followed with regard to confidential information.

The CEO, John Rennison, has overall responsibility for data protection matters within 1st Homecare.

### 2. RIGHTS UNDER THE DATA PROTECTION ACT 2018

#### 2.1 Individual rights

The Act gives individuals eight rights, which are in summary as follows:

- The right to access their personal data
- The right to be informed about the collection and use of their personal data
- The right to have inaccurate personal data rectified, or completed if it is incomplete
- A right for individuals to have personal data erased
- The right to request the restriction or suppression of their personal data.
- The right to data portability allowing individuals to obtain and reuse their personal data for their own purposes across different services
- The right to object to the processing of their personal data in certain circumstances
- Rights related to automated decision making

#### 2.2 Procedure for access to records

An employee or client wishing to view the personal data held by 1st Homecare about them should put their request in writing addressed to the Branch Manager. The request may be to view personal data held on computer or in any written records. 1st

Homecare may ask the individual to complete an appropriate form. All requests will be dealt with as soon as possible, normally within 2 weeks but in any case within one month of receipt of the request. Data will only be withheld in accordance with the exceptions contained in the Act.

Data will need to be viewed in the office by employees. Clients who wish to view the data in their own home may do so – in this case, an appropriate member of management will arrange to visit the client to show them the data.

Employees and clients are requested to check the accuracy of the data held about them and inform 1st Homecare of any amendments that need to be made.

1st Homecare will not charge for requests except in circumstances permitted by the Act.

### **3. RESPONSIBILITIES UNDER THE DATA PROTECTION ACT 2018**

1st Homecare is required, as a data controller, to ensure that in processing personal data it complies with the data protection principles, which are as follows:

- Lawfulness, fairness and transparency: there must be a valid lawful basis for processing data, and nothing should be done with the data in breach of any other laws. Personal data must be used in a way that is fair and transparent
- Purpose limitation: it is necessary to be clear about the purposes for which the data is processed, from the start
- Data minimisation: the data controller must ensure that the data being processed is adequate (sufficient to properly fulfil the stated purpose), relevant (has a rational link to that purpose), and limited to what is necessary
- Accuracy: the data controller should take all reasonable steps to ensure the personal data it holds is not incorrect or misleading as to any matter of fact
- Storage limitation: personal data must not be kept for longer than needed
- Integrity and confidentiality (security): the data controller must ensure that it has appropriate security measures in place to protect the personal data it holds
- Accountability: the data controller is required to take responsibility for what it does with personal data and how it complies with the other principles

1st Homecare has developed a privacy notice for employees and for clients explaining among other things what personal data it collects, why it does so, what it is used for, the lawful bases for collecting and processing it, and how to complain. The full versions are attached to this Policy, and short versions have been provided to existing clients and employees and are attached to the client handbook and employee handbook and to the staff application form.

#### 4. ACTIONS TO BE TAKEN BY 1ST HOMECARE

1st Homecare takes its responsibilities under the Act seriously and intends to comply with the requirements of the Act, except where other laws or legal obligations override these requirements. The privacy notice attached below to this Policy sets how 1<sup>st</sup> Homecare complies with the Act.

All personal data held by 1st Homecare will be retained in accordance with the Privacy Notice.

#### 5. SECURITY OF DATA

All personal data collected, held and processed by 1st Homecare will be treated as confidential and will be held securely. 1st Homecare maintains security safeguards against the destruction, loss, unauthorised use or alteration of data. Any data that it is necessary for 1st Homecare to transfer will be done in the most secure way.

1st Homecare is paperless, which allows for greater security. All information regarding clients and employees that is held by 1st Homecare is stored securely on digital systems. These are accessed via computers that are password protected with access only allowed by a limited number of authorised members of staff who are Office based. Client and employee files are held on cloud-based storage systems that are password protected, secure, and can be retrieved in the event of data destruction caused by a virus attacking the system. Staff also regularly “back up” the information onto an external hard drive, to protect the data in case of a computer failure or any major interruption to the business. Holding files in a paperless form also provides greater protection against loss or destruction through an event such as a fire.

The offices are never left unattended during office hours, and outside office hours are kept securely locked.

#### 6. NATIONAL DATA OPT-OUT

1st Homecare reviews its data processing on an annual basis to assess if the national data opt-out applies. New processing is also assessed to see if the national data opt-out applies.

If any data processing falls within the scope of the national data opt-out, 1st Homecare will use MESH (Messaging Exchange for Social Care and Health) to check if any of its clients have opted out of their data being shared between health and adult social care organisations.

At the review date for this Policy, 1st Homecare does not share any data for planning or research purposes to which the national data opt-out would apply.

### 7. GENERAL

This Policy replaces the previous version. It may be amended at any time and staff will be notified of the amended Policy.

### APPENDIX 1

#### PRIVACY NOTICE – CLIENTS (FULL)

We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and other organisations in the event you have a complaint.

##### 1. Who are we?

We are 1st Homecare. The full name of the company through which we provide services in Oxford and the surrounding area is 1st Homecare (Oxford) Ltd., and the full name of the company through which we provide services in Leighton Buzzard, Bedfordshire and the surrounding area and also services in and around Kings Langley, Hertfordshire, is 1st Homecare Solutions Ltd.

As a provider of social care and support services, we collect and use certain **personal information** about our clients.

##### 2. The personal information we collect and use in relation to people who enquire about and use our services

When you enquire about our care and support services, and for so long as we provide care and support services to you, we collect and use some or all of the following personal information (depending on what is relevant):

- your name, home address, date of birth and contact details (including your telephone number and an email address if you have one), your emergency contacts (including the name(s) of your emergency contacts, your relationship to them, and their home and mobile telephone numbers and/or email addresses)
- where this applies, your needs assessments and financial assessments from any appropriate external social or health care professionals/public body
- your allergies, your background medical, physical and mental history, your current medical, physical or mental conditions, and your care and support needs. We may collect this from you and also from any appropriate external social or health care professionals (including your GP) and/or public body
- your likes, dislikes, hobbies and interests, and lifestyle preferences (including your religious beliefs or other beliefs of a similar nature, racial or ethnic origin, and health so far as they relate to providing you with suitable care) both from you and where

appropriate from your family/ friends/any other person you have nominated as your representative

- credit or direct debit details (if you pay for some or all of our services using one of these methods)
- details of anyone you have appointed as your Attorney
- other personal information regarding you not covered by the above but which is strictly required for the purposes of providing you with care and support services

### 3.How we use the personal information we collect

#### 3.1Our responsibilities as “controller”

We are what is called the ‘controller’ of the personal information we collect regarding you, and we are responsible for how that information, or “data” is managed. The [General Data Protection Regulation](#) (“GDPR”) sets out our obligations to you and your rights in respect of how we manage your personal information.

As the ‘controller’ of your personal information, we will ensure that the personal information we hold about you is:

1. used lawfully, fairly and in a transparent way.
2. collected only for valid purposes that we have clearly explained to you and not used in any other way
3. relevant to the purposes we have told you about and limited only to those purposes
4. accurate and kept up to date
5. kept only as long as necessary for the purposes we have told you about
6. kept securely.

#### 3.2 How we use your personal information

We use your personal information to:

- set you up as a client within our care planning and monitoring and delivery systems, and to prepare, review and update risk assessments and care plans and related documentation
- to provide you with appropriate care and support according to your assessed needs

- to communicate with you, and if appropriate your representative(s) (if any), your family, and any appropriate external social or health care professionals or public body about your individual needs to ensure we deliver the best possible service to you
- invoice you or a public body (as appropriate) for the care and support services we provide to you, in accordance with our terms and conditions
- carry out quality assurance procedures, review our service and improve our customer experience (please note that feedback can also be provided anonymously)
- comply with our legal and regulatory requirements.

### 3.3 Who we share your personal information with

We only share your personal information with third parties where it is **strictly necessary in order to provide you with the care services we have undertaken to provide, or as a requirement placed upon us as a care provider by law**. Our starting point is that information we hold regarding you will be kept confidential in accordance with the terms of our Confidentiality Policy, however, in order to provide care services to you that meet your needs, we may share personal information with the wider team involved in your care. For example, we share your medical information with appropriate external social or health care professionals (including your GP and pharmacist), and we also share information relating to you and to the care we provide to you, with any individuals you have nominated as your representative, with any Attorney you have appointed, and/or with your family, where this is appropriate. This data sharing enables us to establish the type of care and support you need, and to ensure you have the right care package to suit your individual circumstances and your changing needs. Were you to change care provider at any point, we may also need to share information with the incoming care provider to ensure that you continue to receive the care and support you need.

We will share personal information with regulatory bodies, law enforcement bodies or other authorities if required by law. This includes information required by public bodies to evidence our compliance with the applicable regulatory framework for social care providers and/or compliance with a contract with a public body to provide services. We are also required to share personal information with external social or health care professionals, including public bodies and local safeguarding groups (in some circumstances) to ensure your safety.

In order to be able to provide you with care services, we have contracts with third parties for the use of rota planning and care delivery software, and for cloud-based data storage (as we operate on a “paperless” basis). These third parties also comply with the terms of the GDPR including with regard to security measures.



**We will not share your personal information with any third party who is not involved in the provision of care services to you. We will not sell or trade any personal information regarding you.**

#### **4. The lawful bases on which we can collect and use your personal information**

We rely on one or more of the following grounds within the GDPR as the lawful bases on which we collect and use your personal data and special category data (such as your health):

- Article 6(1)(b) – processing is necessary for the performance of our **contracts** to provide individuals with care and support services to comply with our obligations under the contract
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law
- Article 6(1)(f) – processing is necessary for the purposes of our legitimate interests, namely the processing of your personal information in order to provide you with necessary care and support services that we have been commissioned to provide by a public body (local authority or NHS)
- Article 9(2)(h) – processing is necessary for the **provision of social care** or the management of social care systems and services
- Article 6(1) (a) – in appropriate circumstances, where none of the lawful bases referred to above in this paragraph will apply, your **consent** has been sought and given to processing.

#### **5. Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. Where third parties process personal information on our behalf for the purposes of providing you with care and support services, they also have security measures in place and their staff are under a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

### 6. Transfer of your information out of the EEA

In order to provide our clients with care services, we use third parties, which include a cloud-based storage platform, to store and process our client records and also for our care planning and rota planning processes. These third parties may store your data outside the European Economic Area, including in the United States. We have satisfied ourselves that these third parties have appropriate systems and safeguards in place to protect your privacy rights and give you remedies in the unlikely event of any misuse of personal information, as permitted under the GDPR. We will not otherwise transfer or permit the transfer of your personal data outside of the UK. If you would like any further information, please contact us.

### 7. Your Rights

Under the [GDPR](#) you have a number of important rights free of charge. In summary, this includes rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information;
- require us to correct any mistakes in your information which we hold;
- request the erasure (i.e. deletion) of personal information concerning you, in certain situations. **Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide care and support services to you;**
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.

For further information on your rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

### 8. How to contact us

If you would like to exercise any of your rights, please:

- email, call or write to us
- let us have enough information to identify you (*eg your name and address*),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

### 9. Whether information is required, and why

Without information regarding your medical, physical, or mental condition, we cannot assess your care needs or provide any care services to you.

The provision of your name, home address, information on accessing your home and also your telephone number(s), is required so that we can arrange a care worker or workers to attend your home to deliver the services. Information on your key contacts is required so that we can contact them in an emergency situation and/or to be able to provide you with the care and support services you need.

### 10. How long your personal information will be kept

We will hold information for as long as we need in order to comply with our legal and regulatory requirements. We will normally hold the personal information kept within your client file for 3 years from the last date on which we provide you with care services.

### 11. How to complain

We hope that we can resolve any query or concern you raise about our use of your information. In the first instance, you can raise a concern using our complaints procedure, which is included in your client handbook given to you when we first start providing services to you.

The [GDPR](#) also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

### 12. Changes to this privacy notice

We may change this privacy notice from time to time, when we do we will inform you via email or letter, depending how we normally correspond with you.

### 13. If you need extra help

If you would like this notice in another format (for example: audio, large print) please contact us (see 'How to contact us' above).

### 14. Other

If you have any questions about this privacy notice or would like further explanation as to how your personal information is managed, please send an email to us, write to us or call the Office.

Please note when we refer to in the above notice to:

- A “**public body**” we mean any organisation in the United Kingdom which delivers, commissions or reviews a public service and includes (but is not limited to) local authorities, councils, unitary authorities, clinical commissioning groups, health and social care trusts, and the National Health Service, as well as their arm's length bodies and regulators.
- A “**social or health care professional**” we mean any person who provides direct services, acts as consultant or is involved in the commission of your healthcare or social care services, including (but not limited to) your General Practitioner (GP), dental staff, pharmacists, nurses and health visitors, clinical psychologists, dieticians, physiotherapists, occupational therapists, hospital staff, social workers and other care and support related professionals.

### APPENDIX 2

#### PRIVACY NOTICE – EMPLOYEES (FULL)

We ask that you read this Privacy Notice carefully as it contains important information on the following:

- How and why we, as your employer, collect, store, use and share personal information
- your rights in relation to your personal information and
- on what to do in the event you have a complaint.

#### 1. The personal information we collect and use

##### 1.1 The personal information we collect and use in relation to job applicants

When you apply to 1st Homecare for a job we **collect and use** personal information regarding you in order to (a) carry out pre-employment checks and (b) comply with our legal, regulatory and contractual obligations.

The personal information we collect and use includes the following:

- Your name, address (including previous addresses where necessary), date of birth, phone numbers, email address
  - Driving licence details and any endorsements, car insurance and MOT (where applicable)
  - Your education and training history
  - Your employment history
  - Your eligibility to work in the UK
  - Details of any criminal record including spent convictions
  - Information regarding you necessary for the purposes of equal opportunities monitoring
  - Your National Insurance number
  - Details of your passport and birth certificate
-

- Your bank details
- Referees contact details
- Any medical conditions you wish to disclose
- Proof of address

### 1.2 The personal information we collect and use in relation to employees

During your employment with 1st Homecare, we will already hold the information that we obtained from you when you applied for a job with us (see 1.1 above), and in addition, we will **collect and use** the following types of personal information:

- Sickness records including records of sickness benefits
- Holiday records
- Bank account details
- Payroll information
- Induction related records
- Training and qualification records
- Disciplinary and performance records
- Appraisals, supervisions and spot checks
- Incidents and accidents
- Terms and conditions of employment
- Information regarding gender, marital status, ethnic origin and religion
- Information on criminal convictions incurred after your employment has started
- Compliments and complaints regarding you

## 2. How we use the personal information we collect

### 2.1 Our responsibilities as “controller”

We are what is called the ‘controller’ of the personal information we collect regarding you, and we are responsible for how that information, or “data” is managed. The [General Data Protection Regulation](#) (“GDPR”) sets out our obligations to you and your rights in respect of how we manage your personal information.

As the ‘controller’ of your personal information, we will ensure that the personal information we hold about you is:

1. used lawfully, fairly and in a transparent way.
2. collected only for valid purposes that we have clearly explained to you and not used in any other way
3. relevant to the purposes we have told you about and limited only to those purposes
4. accurate and kept up to date
5. kept only as long as necessary for the purposes we have told you about
6. kept securely.

### 2.2 How we use your personal information

We use your personal information only for the purposes of your employment, for fulfilling our contractual and regulatory requirements, and for providing care and support services to our client. Processing of your information is done for reasons including the following:

- to carry out pre-employment checks including a DBS check and reference checks
- to set you up as an employee in our care planning system and set your staff file up on our Cloud based data storage system
- to issue you with terms and conditions of employment
- to set you up on payroll
- to set you up on the People’s Pension (unless you choose to opt out)
- to set up appropriate training and qualifications for you and to record completed training and qualifications

- to enter data onto the National Minimum Data Set in order to qualify for Workforce Development Funding for professional qualifications
- to enrol you onto the childcare voucher scheme we have set up
- to rota you for care duties
- to comply with our legal, regulatory and contractual obligations, for example, such as to the tax authority, the Care Quality Commission, to the NHS, and to local authorities.

### 2.3 Who we share your personal information with

We only share your personal information with third parties where it is **necessary for the purposes of carrying out pre-employment checks, fulfilling our obligations as an employer, to provide care services, and to fulfill legal, regulatory and contractual requirements.**

Our starting point is that information we hold regarding you will be kept confidential in accordance with the terms of our Confidentiality Policy. We will share your personal information for the purposes of carrying out employment checks, and with regulatory bodies, law enforcement bodies or other authorities if required by law. This includes information required by public bodies to evidence our compliance with the applicable regulatory framework for social care providers and/or compliance with a contract with a public body to provide services. We will share your personal information for the purposes of setting up terms and conditions and employee benefits, for example, enrolling you onto a pension, and also for setting up training for you. We may also be required to share your personal information with external social or health care professionals, public bodies, and local safeguarding groups (in some circumstances).

We have contracts with third parties for the use of rota planning and care delivery software, and for cloud-based data storage (as we operate on a “paperless” basis). These third parties also comply with the terms of the GDPR including with regard to security measures.

**We will not share your personal information with any third party for any other reason and we will not sell or trade any personal information regarding you.**

### 3. The lawful bases on which we can collect and use your personal information

We rely on one or more of the following grounds within the GDPR as the lawful bases on which we collect and use your personal data and special category data (such as your health):

- Article 6(1)(b) – processing is necessary for the performance of our **contracts with our employees** to comply with our obligations under the contracts



- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with our **regulatory framework** and the law
- Article 6(1)(f) – processing is necessary **for the purposes of our legitimate interests**, namely to employ you and process information in connection with your employment, so that we have staff to provide the necessary care and support services that we have been commissioned to provide by a public body (local authority or NHS)
- Article 9(2)(h) – processing is necessary for the **provision of social care** or the management of social care systems and services
- Article 6(1) (a) – in appropriate circumstances, where none of the lawful bases referred to above in this paragraph will apply, your **consent** has been sought and given to processing.

#### 4. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. Where third parties process personal information on our behalf for the purposes of fulfilling contractual obligations to you and/or providing employee benefits to you and/or for the purposes of providing care and support services to our clients, these third parties also have security measures in place and their staff are under a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

#### 5. Transfer of your information out of the EEA

In order to ensure the greatest security for the employee and client information that we hold, we use third parties, including a cloud-based storage platform, to store and process our employee records and also for our care planning and rota planning processes. These third parties may store your data outside the European Economic Area, including in the United States.

We have satisfied ourselves that these third parties have appropriate systems and safeguards in place to protect your privacy rights and give you remedies in the unlikely event of any misuse of personal information, as permitted under the GDPR. We will not otherwise transfer or permit the transfer of your personal data outside of the UK. If you would like any further information, please contact us.

### 6. Your Rights

Under the [GDPR](#) you have a number of important rights free of charge. In summary, this includes rights to:

- fair processing of information and transparency over how we use your personal information;
- access to your personal information;
- require us to correct any mistakes in your information which we hold;
- require the erasure (i.e. deletion) of personal information concerning you, in certain situations. **Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to fulfil our employer obligations to you;**
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.

For further information on your rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

### 7. How to contact us

If you would like to exercise any of your rights, please:

- email, call or write to us
- let us have enough information to identify you (*eg your name and address*),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

### 8. Whether information is required, and why

Without collecting, storing and processing the information regarding you as listed above, we cannot fulfil our regulatory and contractual obligations, we cannot fulfil our employer obligations to you, and/or provide you with work.

### 9. How long your personal information will be kept

We will hold information for as long as we need in order to comply with our legal and regulatory requirements. We will normally hold the personal information kept within your staff file for 3 years from the last date on which we employ you.

### 10. How to complain

We hope that we can resolve any query or concern you raise about our use of your information. In the first instance, you can raise a concern using our complaints procedure, which is included in your client handbook given to you when we first start providing services to you.

The [GDPR](#) also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

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We may change this privacy notice from time to time, when we do we will inform you via email or letter, depending how we normally correspond with you.

### 12. Other

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Please note when we refer in the above notice to:

- A “**public body**” we mean any organisation in the United Kingdom which delivers, commissions or reviews a public service and includes (but is not limited to) local authorities, councils, unitary authorities, clinical commissioning groups, health and social care trusts, and the National Health Service, as well as their arm’s length bodies and regulators.
- A “**social or health care professional**” we mean any person who provides direct services, acts as consultant or is involved in the commission of your healthcare or social care services, including (but not limited to) your General Practitioner (GP),

dental staff, pharmacists, nurses and health visitors, clinical psychologists, dieticians, physiotherapists, occupational therapists, hospital staff, social workers and other care and support related professionals.

### CHANGE HISTORY

Issue	Date	Description of Change and Reason
1	November 2012	First issue
2	December 2013	Second issue
3	November 2014	Third issue – insertion of review date and formatting changes to standardise lay out of document
4	October 2016	Fourth issue – changes include deletion of reference to Business Continuity Plan, and of reference to CCTV cameras
5	February 2017	Fifth issue – changes to make applicable to both businesses
6	May 2018	Sixth issue – changes due to introduction of GDPR
7	October 2018	Seventh issue – change of address for Oxford
8	February 2020	Eighth issue – inclusion of KL address, amendment to procedure to access records to require requests to be made to the Branch Manager, and inclusion of reference to KL in section “Who are we” in Privacy Notice for clients.
9	September 2022	Ninth issue – change to reflect 1st Homecare being entirely paperless with use of Dropbox, Access Care Planning, and PeoplePlanner.

### DOCUMENT CONTROL

Name of document	Data Protection Policy
Status	Approved
Issue	9
Issue date	September 2022
Maintainer	1HC
Owner	1HC
File name	1HC Data Protection Policy
File location	1HC Policies/Admin
Review date	September 2024