

Data Protection Policy

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Purpose & Scope

This policy sets out and explains:

- Irinni (“IRINNI”) commitment to data protection and confidentiality in relation to:
 - staff
 - service users
 - referrer and
 - contracted members of IRINNI’s network (“practitioner”)
- The cases where information must be shared.
- The security measures IRINNI has in place to ensure data stays safe
- Consequences for any breach of this policy

Aims of the Policy

This policy is designed to protect the best interests of our staff, service users, referrers and practitioners, as well as making explicit the responsibilities and boundaries of IRINNI in relation to data protection. It seeks to ensure that IRINNI is compliant with all applicable laws and regulations pertaining to the gathering, usage, storage and destruction of data collected in the course of providing their services.

Our commitment

Data or Personal Data or Business Data refers to information relating to staff, service users, referrers or practitioners from which they can be identified (e.g. name, address, date of birth etc.). IRINNI are committed to the principles of data protection and to upholding the General Data Protection Regulations (2018) (GDPR), Data Protection Act (2018) and Data Protection Regulations (2018).

IRINNI strives to ensure that:

- All data is processed fairly and lawfully
- Personal data is only obtained and processed for one or more specified and lawful purposes
- Personal data is adequate, relevant and not excessive
- Personal data is accurate and updated as necessary
- Subject to statutory retention requirements, data will not be kept for longer than is necessary and only for the original purpose for which it was obtained
- Personal data will be processed in accordance with the individual’s rights under the DPA and GDPR
- Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
- Proper consent will be obtained from the service users, either via the referrer or, if necessary, from the patient directly.
- Service users will be given information as to how their data will be used by IRINNI via a Fair Practice Notice
- Destruction of Data will be carried out securely at the end of any required retention period and evidence of that destruction obtained

Who does IRINNI hold data on?

IRINNI collects, uses and stores data on:

- Staff members, including contact and other personnel information

- Service users referred to our service for the purposes of intervention, including contact details, reasons for referral and extracts of medical histories
- Referrers, including contact numbers, named contacts
- Practitioners, including contact details, qualifications, accreditation, insurance, DBS (disclosure)

Usage

IRINNI will only request and store information for which there is a genuine business or legal need and will not use or disclose it for any purpose other than that for which it was requested and provided. IRINNI will always make it clear to service users and our referrers why we are requesting or holding data.

IRINNI will not pass on any information to other party (excluding practitioners) unless agreed in writing by the referrer. In the event of legal obligation to disclose patient information.

Information Handling

We recognise that all staff, patient, referrer and practitioner information should be treated with the utmost respect, and that some data can be of a sensitive nature. Only those staff members/practitioners who are authorised to access relevant information and are required to do so as part of their duties will have access to any such sensitive data. Under all circumstances they will handle it in accordance with this policy.

Disposal of Information

Once any appropriate retention period has lapsed we will ensure that data is destroyed in a secure manner and proof of that destruction obtained to be available on request.

Training

All staff will receive an induction to this policy and a record of that training kept along with acknowledgement by the staff member that they have understood the policy.

This induction will include:

- an overview of IRINNI and the data that it uses, and will cover the following topics:
- the importance of the role that each member of staff plays in keeping Information secure and their responsibilities in relation to data protection
- The expectations of IRINNI in the use of any systems
- What actions to take in the event of a suspected data breach

This policy will also form part of the contract between IRINNI and any practitioners operating within the IRINNI network.

Any staff found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.