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## CARER SUPPORT SOUTH LAKES PRIVACY POLICY

Carer Support South Lakes (CSSL) 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.

### 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

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- 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

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- 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 captures and uses**

This website captures and use 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.

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#### 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: CSSL, a Company Limited by Guarantee, registered in England & Wales with company number: 7567467. CSSL is also a registered Charity, with number: 1142184

CSSL registered offices are:  
Beezon Annexe  
Beezon Road  
Kendal  
LA9 6EL

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## 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.