

## **Snap Care Confidentiality and Data Protection Policy**

### **Purpose**

Snap Care Limited is committed to protecting the privacy, confidentiality, and rights of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As a domiciliary care provider, we handle sensitive personal data about clients, employees, and others. We will process, store, and share this data responsibly, securely, and only when necessary.

This policy outlines how Snap Care Limited collects, uses, stores, protects, and shares personal and confidential information. It applies to all staff, contractors, and volunteers who may access personal or sensitive data during their work with us.

This policy applies to:

- Clients (service users) and their families
- Support workers and other employees
- Contractors, volunteers, and agency staff
- External professionals and representatives who work with us

## **Policy Summary:**

This policy explains how Snap Care collects, uses, stores, and protects personal and sensitive data, including client care records and staff information. It sets out the responsibilities of staff and management in maintaining confidentiality, respecting individuals' data rights, and complying with legal requirements. The policy also outlines how data is shared safely with relevant professionals, retained appropriately, and securely disposed of. It ensures everyone working with or for Snap Care understands the importance of safeguarding personal information as part of delivering high-quality, lawful, and respectful care services.

#### **Policy**

## **Key Principles**

Snap Care follows the **seven principles of data protection** under UK GDPR:

- 1. **Lawfulness, fairness, and transparency** Data is processed legally and individuals are informed.
- 2. **Purpose limitation** Data is collected for specific, legitimate purposes.
- 3. **Data minimisation** Only data necessary for the purpose is collected and used.
- 4. Accuracy Data is kept accurate and up to date.
- 5. **Storage limitation** Data is not kept longer than necessary.
- 6. **Integrity and confidentiality (security)** Data is protected against unauthorised access, loss, or damage.
- 7. **Accountability** Snap Care is responsible for compliance and must demonstrate this.

If you have any questions about this policy, please contact us on 020 7729 2200 or email info@snapcare.co.uk



#### Types of Data We Hold

We may collect and process the following types of personal and sensitive data:

- Personal data: Name, address, contact details, date of birth, next of kin
- Health data: Medical history, medications, care needs, GP and hospital details
- Support records: Care plans, risk assessments, visit logs
- Employment data: Staff records, DBS checks, qualifications, training
- **Financial data**: Invoices, payments, direct debits (where applicable)

#### **How We Use Personal Information**

We collect and use personal data to:

- Deliver safe and effective care and support
- Meet legal and contractual obligations
- Maintain accurate records
- Communicate with clients, families, and professionals
- Recruit and manage staff
- Report and respond to safeguarding concerns

### **Consent and Lawful Basis**

We process personal data under one or more of the following lawful bases:

- Consent (where given)
- Performance of a contract (e.g., care agreement)
- Legal obligation (e.g., employment law, safeguarding)
- Vital interests (e.g., in emergencies)
- Legitimate interests (e.g., service monitoring and improvement)

Where required, explicit consent will be obtained—particularly for the processing of sensitive health information.

#### Confidentiality

- All personal information is treated with the highest level of confidentiality.
- Staff are trained on confidentiality and data protection during induction and through regular updates.
- Information is shared only with those who have a legitimate need to know, such as health professionals, family members, or the local authority.
- Any breaches of confidentiality are treated as serious disciplinary matters.



#### **Data Sharing**

We may share information with:

- Health and social care professionals
- Regulatory bodies (e.g., CQC, local authority)
- Emergency services
- · Safeguarding teams
- Payroll, HR, or IT service providers (under contract and data protection agreements)

We ensure that all data sharing is lawful, necessary, and proportionate.

## **Data Security**

We protect data through:

- Password-protected systems and encrypted devices
- Secure storage of paper records
- Staff access controls and need-to-know basis
- Regular data audits and monitoring

### **Data Retention**

- Personal data is retained only for as long as necessary.
- Client records are typically retained for **at least 8 years** after care ends, in line with NHS and CQC guidance.
- Staff records are retained for 6 years after employment ends.
- Secure disposal of records is carried out through shredding or digital deletion.

#### **Data Subject Rights**

Individuals have the following rights under UK GDPR:

- Right to access their data (Subject Access Request)
- Right to rectification
- Right to erasure (in certain cases)
- · Right to restrict processing
- Right to object
- Right to data portability
- Right to complain to the Information Commissioner's Office (ICO)

All requests will be handled within one calendar month unless legally exempt.



## **Breach Reporting**

Data breaches must be reported immediately to the Managing Director. Serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours, as required by law.

## **Roles and Responsibilities**

- Managing Director (Sally Britton): Responsible for overall data protection compliance.
- All staff: Responsible for safeguarding data and reporting concerns promptly.
- External providers: Must comply with Snap Care's data protection agreements.

This policy applies to the following people in our organisation	All employed staff members:  • Senior team • Care workers		
Policy Date	28/03/2025		
Due for Review	28/03/2025		
Who has or can give authority to change policy	Registered Manager		
Where is this policy kept	On the company's shared drive and the company's website		

Date	Reviewer	Version	Date for Next Review