



# Data Protection Policy

March 2023

## Introduction

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This Data Protection Policy explains what information we collect, why we need it and what our legal basis is. It describes how we keep your data safe, how long we keep it, and with whom and in what instances we may share it.

## Who we are

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Care for Carers is a local independent charity and Scottish Charitable Incorporated Organisation (Registered Charity No SC013450). Care for Carers provides information, essential support, short breaks, and many other programmes to unpaid carers. Personal data is necessary for us to carry out our work and fulfil our charitable objectives. We are required to hold data in line with data protection legislation, specifically the General Data Protection Regulation (GDPR) 2018 Act. Care for Carers is the 'data controller', meaning we determine why and how personal data is held and processed.

## Why do we collect information about you?

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We collect information for several purposes: carer support, carer engagement, carer awareness, reporting, monitoring, and programme and provision development. Our funders include Edinburgh Health & Social Care Partnership, the Edinburgh Integrated Joint Board and NHS Lothian, with whom we have agreements to identify carers and deliver support services.

## When do we collect information about you?

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We collect information when you become a member, engage in any support or service, or contact us with an enquiry. Information may also be received through organisations, professionals and via events. Examples include GPs, hospital discharges, NHS Carer Support, Social Work, Social Care Direct, and Edinburgh Health and Social Care Partnership.

## What information do we collect about you?

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On becoming a member, we collect information including your name, address, phone number, email address, and date of birth. We ask you about your health in connection with your caring role and its impact. We also ask about your cared-for person at an anonymised level. There are optional questions on ethnicity, gender, sexual orientation, disabilities, and employment status. These optional questions are for equal opportunities and monitoring purposes: they ensure our services remain accessible and can shape programme and partnership development. Preferring not to answer these optional questions will not restrict access to any of our services and programmes. If you receive one-to-one support, any case notes generated will be collected along with information from any referrals. Additionally, if we assist you with a grant application, we may also collect financial information solely for this purpose.

## How we will use the information we hold about you

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The information we collect about you and your caring role is used to:

- Provide services and programmes to support you in your caring role.
- Send communications for which you have opted in or made a request.
- Shape future service provision.
- Provide anonymised monitoring information to our funders regarding uptake and effectiveness of our services.
- Where relevant and with your knowledge, signpost and refer you for further advice and/or additional services.

## **Lawful basis for processing**

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The lawful basis for processing is 'legitimate interests'. This is so we can engage with carers, provide support, develop provision, and raise awareness of carers and their needs. For special category data such as gender and ethnicity, the data is collected under the lawful basis of 'public interest'. This type of data is anonymised for statistical reporting and monitoring purposes, enabling us to fulfil contractual obligations with funders, the local authority, and government. Your consent will be sought if we would like to use photos, quotes, or any similar details for case studies, to promote our work, or to enable you to share information about your caring role. We will also seek your consent for any referrals. Were there a threat to life, the lawful basis for sharing your information without consent would be 'vital interests'.

## **How long we hold your information**

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We have retention periods in place, and these are reviewed regularly. Your personal data will be held for as long as you are registered with us. If and when you inform us that you are no longer a carer or no longer require our services, we will hold onto your data until the end of the financial year, 31<sup>st</sup> March, for reporting purposes. After this time, it will be anonymised, and any paper records destroyed as confidential waste.

## **Where your information is held**

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Information is securely stored by us at our premises, specifically in locked cabinets and on our password protected and secure online Case Record Management system (CRM). This CRM is compliant with the legislative acts of both GDPR (Jan 2021) and DPA (2018). It is also accredited to ISO27001 Information Security Standard and is registered with the Information Commissioners Office (ICO). It is a secure cloud-based case management system, using Secure Sockets Layer (SSL), meaning all internet communications are encrypted and highly secure. None of your data is exported out of the U.K.

## **Who has access to your information**

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Only authorised personnel in our team will be able to access your information.

## **Who might we share your information with**

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If you ask us to make a referral, you will be giving us consent to share your information for that purpose. We will only share identifiable personal data without consent if there is a threat to life, under the lawful basis of 'vital interests'.

## **Marketing**

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We do not undertake unsolicited marketing. Your data will never be shared with third parties for this purpose.

## **Your rights**

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Your rights include: being informed; access to your data; rectification of inaccurate data; ability to withdraw consent where applicable; to be forgotten; restricted processing of your data until it is accurate or processed in a lawful way; to object to how we process your information. We do not use profiling or automated decision making. Information regarding your data rights can be found by contacting the Information Commissioner's Office on 0303 123 1113, and via <https://ico.org.uk/>.

## **Complaints**

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Should you have any complaints, queries, or requests regarding your data our contact information can be found at the top of this Privacy Notice. If you are unhappy with our response or would like to take matters further, the Information Commissioner's Office can be contacted on 0303 123 1113, and via <https://ico.org.uk/>.