

Data Protection policy

Healthwatch City of London is registered as a Data Controller under the Data Protection Act 1998. All members of staff are responsible for complying with the principles of good practice in the processing of personal data as set out in the Act.

The Data Protection Act gives individuals the right to know what information is held about them and how it is used. It provides a framework to ensure that personal information is handled properly.

The Act obligates us to consider two areas of responsibility.

Why do we need to adhere to Data Protection legislation?

At its heart, the Data Protection Act is about encouraging organisations to treat people fairly. The Information Commissioner's Office has the power to levy significant fines on organisations which do not comply with the legislation. However, the potential damage to a supporter /customer relationship and the organisation's reputation by improper use of data is the bigger threat to Healthwatch City of London and a far better reason to follow the guidelines.

The First principle of the Data Protection act (*that information is fairly and lawfully processed*) covers the practicalities of the act and in order to comply we must provide a "fair collection" notice at the point of data collection (we have identified this as the first point of contact). This should include:

1. Information on the identity of the data controller (the legal entity that has made contact with the individual).
2. Its purposes for collecting and processing the data.
3. Any other information to enable the processing to be fair.

We should obtain personal data from data subjects (donors, customers, beneficiaries or anyone else we want to hold data for) in a manner that does not deceive or mislead them as to how we intend to use the data. Also, we need to ensure that personal data is processed with fairness and in compliance with the law.

Data held by Healthwatch City of London will be:

Fairly and lawfully processed

Processed for limited purposes and not in any manner incompatible with those purposes

Adequate, relevant and not excessive

Accurate

Not kept for longer than necessary

Processed in line with the data subject's rights

Secure

Not transferred to countries without adequate protection

Healthwatch City of London collects information for the following reasons:

- To comply with legal obligations
- To fulfil contracts
- To carry out research
- To carry out its role in informing and improving public policies affecting London's older people

The type of data that Healthwatch City of London collects

HWCOL does not provide a personal enquiry service to the public, so collects limited data on individuals. Typical data collected consists of name, address and telephone number in order to add the individual to the organisation's mailing lists e.g. for the distribution of the HWCOL newsletter. Where data is collected for the purpose of monitoring equal opportunities eg from training course participants and prospective employees, this is collected anonymously and is used for statistical purposes only. Research data – HWCOL carries out research into the views and situation of older people in order to inform its policy and campaigning work. Such research is typically carried out through the use of focus groups. Recordings and transcripts of these events are kept without identification of the individuals who have participated. Staff, ex-staff and volunteers – HWCOL maintains data consistent with its role as employer and provides data as required to its payroll agent, statutory authorities and pension funds.

Obtaining the consent of the person on whom data is held

HWCOL will routinely ask for the consent of any individual on whom data is kept. All response forms e.g. for the purchase of publications and for training course and event bookings will include a statement spelling out the purpose for which personal details will be kept and offering an opt-out from addition to the database for future mailings.

Healthwatch City of London will take appropriate measures to maintain the security of its data. Such measures include:

- Data held on staff, ex-staff, volunteers and job applicants is held in locked filing cabinets and access is restricted to designated staff
- Access to computer database records is restricted to designated staff by the use of confidential passwords

Keeping the information accurate and up to date

HWCOL is establishing appropriate methods and frequencies for the updating of all the data that it holds.

How long information will be kept

HWCOL will consider and keep under review appropriate time periods for the retention of data, having due regard to any legal requirements and published guidance on good practice.

Disclosure of information

HWCOL will not disclose any data which it holds to third parties without the consent of the data subject, unless required by law to do so.

Right of subject access

Any person on whom data is kept is entitled to demand to see and/or have a copy of all personal data held and processed about them by HWCoL.

Any such request should be referred to the Healthwatch City of London Officer.

Further guidance

Staff requiring further information or guidance regarding data protection should refer to the Office Manager.

The following is a guideline statement to use when capturing data for Healthwatch City of London:

We will use the information you have supplied to communicate with you in line with Data Protection guidelines. Healthwatch City of London will not share your data with third parties. If you would prefer not to hear from us please do let us know by phoning 020 7820 6787.

By providing your email address and/or mobile number you are agreeing to us contacting you in these ways. You may contact us at any time to unsubscribe from our communications

9 January 2014

Version 1

Version control

Version no.	Date approved	Review due	Owned by	Key changes
1	Mar 2014	Feb 2015	Healthwatch City of London	