



DATA PROTECTION POLICY

Key Messages

The purpose of this document is to outline:

- How Solva Care will ensure compliance with the UK GDPR and Data Protection Act 2018.
- Explain the roles and responsibilities relevant to internal compliance.
- How compliance with this policy will be monitored.

Does this policy relate to me?

This policy applies to the processing of all personal data carried out by Solva Care including processing carried out by trustees, staff, volunteers and contractors.

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1. Introduction

- a. This policy provides a framework for ensuring that Solva Care meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18).
- b. Solva Care complies with data protection legislation guided by the six data protection principles. In summary, they require that personal data is:
 - i. Processed fairly, lawfully and in a transparent manner.
 - ii. Used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
 - iii. Adequate, relevant, and limited to what is necessary.
 - iv. Accurate and, where necessary, up to date.
 - v. Not kept for longer than necessary; and
 - vi. Kept safe and secure.
- c. In addition, the accountability principle requires us to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data. Failure to do so, can result in breach of legislation, reputational damage, or financial implications due to fines.

2. Information Covered by Data Protection Legislation

- a. The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person.
- b. Pseudonymised personal data is covered by the legislation, however anonymised data is not regulated by the UK GDPR or DPA 18, providing the anonymisation has not been done in a reversible way.
- c. Some personal data is more sensitive and is afforded more protection, this is information related to:
 - i. Race or ethnic origin;
 - ii. Political opinions;
 - iii. Religious or philosophical beliefs;
 - iv. Trade union membership;

- v. Genetic data;
- vi. Biometric ID data;
- vii. Health data;
- viii. Sexual life and/or sexual orientation; and
- ix. Criminal data (convictions and offences).

3. Our Commitment

- a. Solva Care is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about clients, volunteers, staff, trustees or those who work or interact with us.
- b. **Training.** We require all trustees and staff to ensure awareness of information governance and security. In addition, all trustees and staff are required to attend a more detailed data protection training module as part of their induction.
- c. **Breaches.** Solva Care will consider any personal data breach incidents and will assess whether we need to report those breaches to the Information Commissioner's Office (ICO) as the Regulator of DPA.

4. Roles and Responsibilities

- a. **Data Protection Officer (DPO).** The Solva Care Data Protection Officer (DPO) is primarily responsible for advising on and assessing our compliance with the DPA and UK GDPR and making recommendations to improve compliance. The Solva Care DPO is Bruce Payne, and he can be contacted at brucepayne241@gmail.com
- b. **Senior Information Risk Owner (SIRO).** The SIRO owns the overall risk arising from the processing of personal data by Solva Care. Our SIRO is the Board of Trustees Chair.

5. Monitoring

- a. Compliance with this policy will be monitored via the DPO, trustees and staff reporting to the Board of Trustees.

6. Further Information

- a. Our Privacy Notice and Data Protection Policy are available on our website and include:

7. Glossary

- a. **Personal data:** Any information relating to an identifiable living individual who can be identified from that data or from that data and other data. This includes not just being identified by name but also by any other identifier such as ID number, location data or online identifier, or being singled out by any factors specific to the physical, physiological, genetic, mental, cultural or social identity of the individual.
- b. **Processing:** Anything that is done with personal data, including collection, storage, use, disclosure, and deletion.
- c. **Personal Data Breach:** A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored, or otherwise processed.
- d. **Pseudonymisation:** The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.