**General Data Protection Regulation (GDPR) Policy**

1st Healthcare is a licenced user of a care management system (Solaris Careware). The cloud - based system is used to create, analyse and share care related data as well as measure outcomes in all areas of care provided. It also serves as a central archive point where previous paper - based reports can be reviewed and updated. The use of the system follows strict GDPR compliance which works in tandem with the care management developers own policies on data protection and access protocols.

Staff are trained to use the system safely and ensure data pertaining to each young person in placement is only assessible to authorised individuals with the user access settings. External guest users also follow a strict guideline on access and sharing protocols.

Actual staff usage on the system follows user responsibilities such as safely securing username/password details which are changed on a weekly basis.

Front line staff are not permitted to work from home and usernames/passwords are locked after office working hours unless a member of staff is on duty at any of the units overnight.

Staff access the record system through approved devises usually no - personal.

**DATA USAGE /MANAGEMENT**  
Organisational Measures – We ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

a) All employees, agents, contractors, or other parties working on behalf of 1st Healthcare are made fully aware of both their individual responsibilities and 1st Healthcare’s responsibilities under the regulation and under this Policy, and shall be provided with a copy of this Policy;

b) Only employees, agents, sub-contractors, or other parties working on behalf of 1st Healthcare that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the company;

c) All employees, agents, contractors, or other parties working on behalf of the company handling personal data will be appropriately vetted and trained to do so;

​d) All employees, agents, contractors, or other parties working on behalf of 1st Healthcare handling personal data will be appropriately supervised around secure data access and distribution.

e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;

f) The performance of those employees, agents, contractors, or other parties working on behalf of 1st Healthcare handling personal data shall be regularly evaluated and reviewed.

g) All employees, agents, contractors, or other parties working on behalf of 1st Healthcare handling personal data will be bound to do so in accordance with the principles of the regulation and this policy by contract;

h) All agents, contractors, or other parties working on behalf of 1st Healthcare handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the company arising out of this Policy and the Regulation.

i) Where any agent, contractor or other party working on behalf of 1st Healthcare handling personal data fails in their obligations under this policy that party shall indemnify and hold harmless the company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

Data Breach Notification - All personal data breaches must be reported immediately to the Data Protection Officer (DPO) or /and the area manager.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the office manager must ensure that the Information Commissioner’s Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

Modifications to our data privacy process - we may update this from time to time. When we change this privacy policy in a significant way, we will send an email or post a notification on our website along with the updated privacy policy to all our account holders/users.

Daily use of sensitive data at our units/offices will follow the usage responsibilities as set in the data protection policies. This includes daily usage and access to information on and offline.

**In accordance to GDPR Article 5 1st Healthcare will ensure:**

a) Processed lawfully, fairly and in a transparent manner in relation to individuals;

b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) Accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;

e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;