



**HEARTLINK EALING HOSPITAL**  
**HEART SUPPORT GROUP**  
**Data Protection Policy & Procedures**



# HEARTLINK EALING HOSPITAL HEART SUPPORT GROUP

## Data Protection Policy & Procedures

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## 1. Introduction

For the purpose of this Data Protection Policy and its associated Procedures, the following will be referred to as;

- Heartlink Ealing Hospital Heart Support Group is referred to as **Heartlink**
- and its Members, Trustees and Volunteers are referred to as **Members**
- The UK General Data Protection Regulation will be referred to as **UK GDPR**

This Policy and its Procedures set out how Heartlink holds and processes personal data. It identifies what data we keep, and why and how we make sure this information is kept safe and is as accurate as possible. The Policy provides guidelines on individuals' rights to see their data and the circumstances under which we may need to disclose data to others. It applies to all personal data that we process regardless of the way that information is stored e.g. on paper, electronically or by other means.

As a matter of good practice, other organisations and individuals working with Heartlink, and who may need access to personal information we hold, will be expected to have read and comply with this Data Protection Policy and its Procedures.

## 2. Legal Requirements

There are rules set out in law which all organisations, including community support groups, must follow in order to help protect people's data and privacy. From the end of the Brexit transition period on 31<sup>st</sup> December 2020, the relevant data protection legislation for organisations in the UK is the UK GDPR, and the Data Protection Act 2018.

Unless exempt, organisations that process personal data need to register with the Information Commissioner's Office (ICO) their use of the data they hold. Heartlink, as a 'Not for Profit' organisation is exempt from this registration.

## 3. Policy Statement

Heartlink is committed to protecting the rights and privacy of individuals and others in accordance with the UK GDPR and Data Protection Act 2018. Heartlink takes compliance with these Acts very seriously. Any breach of the UK GDPR and Data Protection Act 2018, or Heartlink's Data Protection Policy and Procedures is considered as a breach of the Heartlink 'Code of Conduct', and as such may result in the Heartlink Membership being revoked.

## 4. Data Protection Principles

Under the UK GDPR there are six data protection principles that Heartlink must comply with. These are that personal data we hold must be;

1. Processed **lawfully, fairly** and in a **transparent** manner
2. Collected only for legitimate purposes that have been clearly explained and not further processed in a way that is incompatible with these purposes (**purpose limitation**)
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**data minimisation**)
4. **Accurate** and, where necessary kept up-to-date
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (**storage limitation**)
6. Processed with integrity and confidentiality in a way that ensures appropriate **security** of the personal data

## 5. Types of Personal Data Held

Personal information is any information about an individual from which that person can be directly or indirectly identified. Heartlink holds personal data relating to its Members and other necessary contacts. All personal data held is on the written consent of the individual.

### 5.1 Personal Data Held

Heartlink holds personal data on individuals that consists of;

- Full Name
- Postal address
- Telephone number(s)
- E-mail address

### 5.2 Data on Organisations

Data on organisations, and other individuals, whom Heartlink needs to contact to help provide support and activities to its Members is also held on a need-to-know basis.

## 6. Purpose of Data Held

In order to be able to operate efficiently and economically, it is in the legitimate interests of Heartlink to hold such personal information so as to enable effective communication on matters relating to the operation of Heartlink.

The purpose of such personal data held is solely for the use of;

- establishing and maintaining a register of membership
- supporting Heartlink as a not-for-profit association
- providing or administering activities for Members and those who have regular contact with Heartlink
- Sending of Newsletter and other Heartlink related information

## 7. Data Accuracy

Heartlink will take all reasonable steps to keep data accurate and up to date, such as;

- only hold data where necessary to limit errors
- investigate and act upon notifications of inaccuracies
- correct or delete data shown to be inaccurate

## 8. Data Security

Heartlink will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The measures taken include;

- Personal data on paper will be kept in locked filing cabinets with access restricted to only those with authorised access
- Restricted access to computer files and systems
- Password protection on personal information files
- Data is backed up at regular intervals

## 9. Individual Rights

The UK GDPR provides rights for individuals in control of the data held about them, these are;

### 9.1 The Right to be Informed

This includes an obligation on organisations processing personal information to provide 'fair processing' information, typically through a privacy notice and be transparent over how they use personal data.

Detailed information about the type of personal information Heartlink collects how we do this, why we collect it, how we use it and how we keep it safe is contained in our Privacy Policy Notice as outlined in Appendix 1.

### 9.2 The Right of Access.

Individuals have the right to access their own data to help them understand how their data is being used and if this is being done lawfully. This request can be made verbally or in writing and can be made to any member of the Heartlink Committee.

Heartlink will undertake security checks to ensure the data is only given to the legitimate data owner, and where so, will respond to the request within one month. The individual requesting access does not have to use any special forms or words for the request to be valid

### 9.3 The Right to Rectification

Personal data held can be corrected if it is inaccurate or incomplete.

### 9.4 Right to Erasure

Individuals can request the deletion or removal of personal information where there is no compelling reason for its continued processing, e.g. ceasing membership.

### 9.5 Right to Restrict Processing

Individuals have a right to block or suppress the processing of their personal data. The data can still be stored but must not be used further. The circumstances in which processing may be restricted could be where an individual contests the accuracy of personal data, and wants it to be verified, or for example, where the individual wants to remain a Member of Heartlink but does not want to be on any specific mailing list.

### 9.6 Right to Data Portability

This gives individuals the right to obtain and reuse their personal data for their own purposes across different services.

### 9.7 Right to Object

Individuals have the right to object to direct marketing and processing based on legitimate interests. Heartlink does not give out personal data without prior written consent of the data owner.

### 9.8 Rights Related to Automated Decision Making Including Profiling

This is related to automated decision making and profiling using the personal data. Heartlink does not use automated profiling therefore this does not apply to the data held.

## 10. Privacy Statement

The UK GDPR also states that the organisations holding that data should have a Privacy Policy which is written in plain language and sets out the purpose for which the data is held, how it can be accessed, changed, deleted and who else has access to the data.

Heartlink's Privacy Policy Notice can be found in Appendix 1 of this Data Protection Policy.

## 11. Personal Data Breach or Damage

Personal data can be breached or damaged. This may happen where personal data is lost, destroyed, altered, corrupted, accessed or passed on without proper authorisation, or if the data is made unavailable and this causes a significant negative effect to individuals.

These breaches can be the result of both accidental and deliberate causes and the consequences of such damage can cause harm or distress to individuals.

Heartlink's Data Protection Policy and Procedures are designed to minimise the risks to individuals, and to ensure that the reputation of Heartlink is not damaged. Heartlink makes every effort to avoid data protection incidents, however, it is possible that on occasions mistakes can occur.

In the event of a breach Heartlink will promptly assess the risk to individuals concerned, inform them, and if appropriate report the breach to the Information Commissioners office (ICO).

Data Protection is everyone's responsibility and Members are actively encouraged to report any incidents or concerns to any Committee Member in order to comply with our responsibility to Members and improve our Data Protection Policy, Procedures and practices.

## 12. Training

Members authorised access to personal data, or who regularly come across personal data during their volunteering roles, will be required to first read and understand this Policy by signing the Data Protection Declaration Form in Appendix 3. Members will periodically undergo appropriate training commensurate with the scale and nature of the personal data they have access to.

## 13. Appendices

- Appendix 1 Heartlink Privacy Policy Notice
- Appendix 2 Membership Form
- Appendix 3 Data Protection Declaration Form

# Appendix 1 Heartlink Privacy Policy Notice

1. **Personal Data Held** - Heartlink currently collects and process the following information;
  - Full Name
  - Postal address
  - Telephone number(s)
  - E-mail address
2. **Purpose of Data Held** - The personal information we hold and process is provided to us by individuals who wish to become Members of Heartlink. We do not share this information with others without your consent. You can withdraw your consent for us to use your data at any time by contacting us, our contact details are listed at the end of this Privacy Policy Notice.

This personal information is given to us by way of completing our membership form, or via an email, telephone call or letter. The purpose of such personal data held is solely for the legitimate use of;

- establishing and maintaining a register of membership
- supporting Heartlink as a not-for-profit association
- providing or administering activities for Members and those who have regular contact with Heartlink
- Sending out Newsletters or other Heartlink related information

3. **Sharing personal data**

We never share your data with third parties without your consent. Most occasions when data is shared is when it is necessary to involve you in Heartlink organised activities.
4. **Heartlink Website** has an Email Enquiry Form that is used to send your name and email details to us if you wish to become a member. We only retain this data if you have stated you wish to become a Heartlink member. The Website does not contain any other interactive functions and its pages are for viewing only.
5. **How We Store Your Personal Data** - Your information is securely stored in;
  - an electronic file containing the Register of Members.
  - A lockable cabinet containing paper based membership registration details.
6. **How Long do we Hold your Data** - We only keep your details for the period you are registered as a Member with Heartlink and for the purpose it was collected for. We undertake a full review of member registration by contacting you periodically and records are updated accordingly.
7. **How we keep personal data safe** - Heartlink only processes a small amount data, but we take our duty to protect this data very seriously and have in place technical and organisational processes to do this that include;
  - technical security testing of equipment on which data is held
  - backups of data held electronically
  - backup of the website
  - secure storage of paper-based data

8. **Heartlink will keep all personal data safe to the best of its ability.** However, transmission over the Internet is outside of our control and therefore if anyone becomes aware of anything that gives rise for concern you are asked to report it to us immediately. Our contact details are listed below.

9. **Your data protection rights** - Under data protection law, you have rights including:

- **Your Right to be Informed** - This includes an obligation on organisations processing personal information to provide 'fair processing' information, typically through a privacy notice and be transparent over how they use personal data.
- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your Right to Object** – You can object to direct marketing and processing based on legitimate interests. Heartlink does not give out personal data without prior written consent of the data owner.
- **Rights Related to Automated Decision Making Including Profiling** - This is related to automated decision making and profiling using the personal data. Heartlink does not use automated profiling therefore this does not apply to the data held.

10. **How to Complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at

**Heartlink** - C/o Dr Harman Singh, Cardiology Dept, 2<sup>nd</sup> Level  
Ealing Hospital 601 Uxbridge Rd, Southall UB1 3HW

Phone Number: 07518 569380  
E-mail: [info@ealingheartgroup.co.uk](mailto:info@ealingheartgroup.co.uk)  
Web Site: [www.ealingheartgroup.co.uk](http://www.ealingheartgroup.co.uk)



# Appendix 2 Heartlink Membership Form



## EALING HEART SUPPORT GROUP

HONOURARY PRESIDENT  
CONSULTANT CARDIOLOGIST  
PROFESSOR J.S.KOONER. MD.FRCP.

**PLEASE PRINT IN BLOCK CAPITALS**

Mr  Mrs  Miss  Ms  Other Please State

First Name

Surname

Address

Post Code

Phone

Please enter your Email address overleaf

By completing this form you agree to Heartlink holding your details on file

For clarity please enter your email address in uppercase (capital letters).

Email

## Appendix 3 Heartlink Data Protection Form

1.	<b>PROCEDURE OVERVIEW</b>	✓
1.1	<p>This Procedure outlines Heartlink's commitment to adhere to the UK GDPR and Data Protection Act (1998). The Procedure provides a framework for the compliance of Heartlink Members and its Volunteers to the Act while carrying out their activities and duties.</p> <p>Heartlink fully endorses the statements and intent of the Data Protection Act and recognises that it must treat personal information correctly and lawfully. Heartlink regards compliance with the UK GDPR &amp; DPA as essential to creating and maintaining confidence between it, Ealing Hospital and its patients, and any other authorising Authority or organisation for which it may undertake work.</p>	
2.	<b>INTRODUCTION</b>	
2.1	<p>In order for Heartlink Members and Volunteers to undertake activities it is sometimes necessary to use information about individuals. In handling personal data Heartlink is required, by law, to fulfil certain statutory duties.</p> <p>The UK GDPR And DPA establishes a framework of rights and duties which are designed to safeguard personal data.</p> <p>Data means information that is being processed automatically or is recorded with the intention of being processed automatically. Any data recorded as part of a manual filing system or with the intention that it should form part of a relevant filing system is also included in this definition.</p> <p>The UK GDPR and the DPA is comprehensive and complex - at its core it contains the following principles;-</p>	
2.2	<b>THE DATA PROTECTION PRINCIPLES</b>	
	1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met	
	2. Personal data shall be obtained for one or more specified or lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes	
	3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed	
	4. Personal data shall be accurate and, where necessary, kept up to date	
	5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes	
	6. Personal data shall be processed in accordance with the rights of data subjects under the Act	
	7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data	
	8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data	

3.	<b>RESPONSIBILITIES OF HEARTLINK MEMBERS AND VOLUNTEERS</b>	✓
3.1	<p>All Heartlink Members and Volunteers with access to personal data whilst carrying out their duties are responsible for complying with the Data Protection Legislation.</p> <p>Individuals could be committing an offence by sharing information with others where that information does not need to be shared or by using such information for a purpose other than for which it is held.</p> <p>Confidentiality must be preserved and personal data treated in accordance with the UK GDPR and Data Protection Act at all times.</p> <p>Any individual who knowingly or recklessly processes data for purposes other than those for which it is intended, or deliberately acts outside of their responsibilities will have their Heartlink Membership withdrawn and / or be referred to the authorising Authority for investigative purposes and potential legal action.</p>	
4.	<b>MEMBER OR VOLUNTEER DECLARATION</b>	
4.1	<p>I (<i>Name</i> )</p> <p>Have read this Declaration and understand that during the course of my work and responsibilities as a Heartlink Member and /or Volunteer, I may come into contact with personal information regarding patients, staff of Ealing Hospital or any other authorising Authority for which I undertake work.</p> <p>I undertake not to disclose or discuss such information and have understood my responsibilities under the Data Protection Act.</p>	
4.2	<p><b>Signature:</b></p> <p><b>Full Name in block capitals:</b></p>	
4.3	<p><b>Contact Details:</b></p>	
4.4	<p><b>Date:</b></p>	
4.5	<p><b>Counter Signature of Heartlink Committee Member:</b></p> <p><b>Full Name in block capitals:</b></p>	

As amended 31<sup>st</sup> March 2022