

# Old Friends Confidentiality and Data Protection Policy

Effective Date: \_\_\_\_\_

Review Date: \_\_\_\_\_

Approved By: \_\_\_\_\_



## **1. Purpose**

This policy outlines how Old Friends collects, stores, uses, and protects personal and sensitive information relating to its elderly clients and third parties. The purpose is to ensure that all personal data handled by Old Friends is managed lawfully, fairly, and transparently in compliance with applicable data protection laws, including the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

## **2. Scope**

This policy applies to:

- All Clients and Service Providers of Old Friends.
- All systems, processes, and activities that involve personal or sensitive data.
- All client information collected in the course of providing companionship, social support, and related non-personal care services.

## **3. Principles of Data Protection**

Old Friends adheres to the following principles when handling personal data:

1. Lawfulness, Fairness, and Transparency
2. Purpose Limitation
3. Data Minimisation
4. Accuracy
5. Storage Limitation
6. Integrity and Confidentiality
7. Accountability

#### **4. Types of Information Collected**

Old Friends may collect and process the following information:

- Client contact details (name, address, phone number, email)
- Emergency contact information
- Information about preferences, interests, and activities
- Relevant notes to support companionship and non-care services (e.g., scheduling, mobility needs, communication preferences)
- Information necessary for business operations

**Old Friends does not provide personal or medical care services and does not process medical or healthcare data unless explicitly required for safety and only with consent.**

#### **5. Legal Basis for Processing**

Old Friends processes personal data under the following lawful bases:

- Consent
- Contract
- Legitimate Interests

#### **6. Confidentiality**

All Service Providers of Old Friends are required to:

- Treat all client information as strictly confidential.
- Only access, share, or discuss information necessary for service delivery.
- Avoid discussing client details in public or with unauthorized persons.
- Sign a Confidentiality Agreement as a condition of involvement with Old Friends.

Breaches of confidentiality may result in termination of the Service Provider.

#### **7. Data Security**

Old Friends maintains robust security measures to protect personal data, including:

- Secure password-protected systems and devices.
- Encrypted electronic communications where feasible.
- Locked physical storage for paper records.
- Restricted access to client information based on role and necessity.

## **8. Data Retention**

Personal data will be retained only as long as necessary:

- Client information will typically be retained for up to six years after the end of service, unless legal or contractual obligations require longer storage.
- After the retention period, data will be securely destroyed or anonymised.

## **9. Data Sharing**

Old Friends will not sell or share personal data with third parties for marketing purposes.

Data may be shared only with:

- Service Providers providing service through Old Friends.
- Authorities when legally required (e.g., safeguarding or law enforcement).

## **10. Individual Rights**

Under data protection laws, individuals have the right to:

- Access their personal data.
- Request correction of inaccurate data.
- Request deletion (“right to be forgotten”).
- Restrict or object to processing.
- Request data portability.

Requests should be made in writing to the Data Protection Officer at Old Friends (see Section 13).

## **11. Data Breach Procedure**

If a data breach occurs, Old Friends will:

1. Contain and assess the breach immediately.
2. Notify the Information Commissioner’s Office (ICO) within 72 hours if required.
3. Inform affected individuals when there is a high risk to their rights or freedoms.
4. Record all breaches in a Data Breach Register.

## **12. Training and Awareness**

All Old Friends Service Providers receive:

- Standing Old Friends Policy on confidentiality and data protection.
- Regular updates of current policies and legal obligations.

## **13. Contact Information**

For any questions or concerns regarding this policy or personal data handling, please contact:

Sole Proprietor: .....

Email: Oldfriends.Northants@gmail.com

Phone: 01604 969486

## **14. Policy Review**

This policy will be reviewed annually or sooner if significant changes occur in legislation or operations. Updates will be communicated to all Service Providers.

## **Acknowledgement**

All Service Providers must sign to say they have read, understand, and agree to comply with this Confidentiality and Data Protection Policy as a condition of engagement with Old Friends.

Signed: .....

Name: .....

Date: .....