



**LIFELINE**  
C A R E

## **Privacy Policy**

**Date of Policy 16.09.2024**

**Review 16.09.2025**

Lifeline Care Group recognises its legal obligations under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) to protect the personally identifiable and sensitive data of our clients, employees, social or healthcare professionals, visitors and the public.

The purpose of this policy is to set out how we collect, use, retain and disclose the personal information we hold about you.

Lifeline Care Group is committed to protecting the privacy and security of your personal information and seeks to be transparent in the way in which it processes data on your behalf.

As the 'Data Controller', we will ensure that the personal information we hold is:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have informed you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;
- Kept securely.

It is the overall responsibility of the Care Manager to ensure that all staff have read and signed (as understood) this Privacy Policy for Lifeline Care Group, and that it is implemented consistently in daily practice.

A current copy of the policy will be available in the HR Telegram group, a paper copy can be found in the Lifeline Care Group office.

This policy will be reviewed at least annually, or more frequently if significant changes occur.

What is 'personal' and 'sensitive' data and processing?

Personally identifiable information- is any information that identifies a person, for example, name and address.

Sensitive personal information- is any personal data that reveals:

- Racial or ethnic origin
- Political opinions
- Religious or similar beliefs
- Trade union membership
- Physical or mental health condition
- Sexual life or orientation

Processing data - is any operation that is performed with or on data, for example, the collection of, the manipulation of, the use of, the sharing of and the storage of information that has been shared with the organisation or collected on behalf of the organisation.

### Your rights

Under the Data Protection Act 2018 and The General Data Protection Regulation (GDPR) you have the following rights in respect of the personal data that Lifeline Care Group holds about you:

- The right to be informed about how your data is processed by Lifeline Care Group.
- The right to access your personal data and verify its accuracy.
- The right to have incorrect data updated if the information we hold on you is inaccurate or incomplete.
- The right to be forgotten and have data erased.
- The right to stop or restrict the processing of your personal data.
- The right of data portability (allowing you to get and reuse your data for different services).
- The right to object to how your data is processed in certain circumstances.
- For further information on your rights can be found on the following website: [Jersey Office of the Information Commissioner - Home \(jerseyoic.org\)](http://jerseyoic.org)

### Information that we collect about our service users

Lifeline Care Group may collect and process two categories of personal information about you:

Standard personal information- This includes information we use to identify you, contact you and manage our relationship with you:

- Your full name, home address, email address and phone numbers and details of your next of kin;
- Other information may include: the country you live in, your age and your date of birth;
- Details of any contact we have had with you, for example, any compliments or complaints;

- Financial details, for example, details about your payments, your bank details and funding details.

Special categories of information- This includes information that is particularly sensitive:

- Information about your physical or mental health, including genetic information or biometric information;
- Information about your race, ethnic origin and religion;
- Information about any criminal convictions and offences;
- We may also collect information via your healthcare professional, referral details from your GP or from the local authority.

### How and why, we collect this information

The main source of where we receive our information is directly from you either manually or electronically.

In most cases Lifeline Care Group obtains most of the personal data directly from you or your family during initial assessments, and information can be collected by referrals from your GP, Social Workers or initial pre-assessments completed by your local authority.

We collect and hold personal information about you that is relevant to assisting the care team to deliver safe, appropriate and person-centered care and support to meet your needs and preferences.

Your information will help us to:

- Design a person-centred care plan and package to provide you with the right care and support to meet your individual needs and preferences;
- Complete regular reviews of your care needs and respond to any changes so that we can tailor our services to always meet your needs and ensure care is safe and effective;
- Communicate with you, your representatives/family and/or your next of kin;
- Provide health and social care professionals who are involved in your care with relevant and up-to-date information about your health or care needs;
- Answer any queries that you may have or investigate your concerns or complaints;
- Keep you safe from harm and abuse, and protect the health and safety of our staff and others;
- Invoice you where you are self-funding;
- Seek your feedback to check the quality of the service that we provide and improve it where necessary.

### What we do with this information

Your personal information is important, so we make sure that all the information that we have about you is safely and securely stored.

Most of this information is written in your care and support plans. The care worker will look at your care and support plan each time that they visit. They will make a note of the care and

support they provide at the end of every visit. You have a copy of all these records in the Lifeline Care Group Care & Support Plan folder which we leave at your home.

We also keep copies of this information in:

- The Lifeline Care Group office;
- With the 'On-Call' staff member who provides management support out of office hours.

### Who else views this information?

It is very important to us to provide you with holistic care to meet your care needs and wishes. To do this effectively, we may sometimes need to share information about you with others such as other professionals or agencies involved in your care and treatment. This is done so with your consent and on a 'need to know basis'. Only employees who are directly involved in your care and support will have access to your personal information.

As part of our duty of care to ensure the safety and wellbeing of our clients and staff, there may be exceptions to seeking your consent for information to be disclosed. This would be when we are required by law to provide information, e.g., to help with a criminal investigation. Even when seeking to notify the local authority of a safeguarding matter or the Care Quality Commission of an incident that requires us to notify them, we would only do so with consent or ensure that the information provided is treated in confidence. We will share information for your best interest in the event of an emergency. We expect all third parties to respect the security of your data.

### Access to your Records

You have a right under Data Protection law and General Data Protection Regulation (GDPR) to access personal information that is held about you. The information that can be shared with you is limited to 'personal data' that relates to you only, and not to information relating to other people (unless the information about you needs to be obtained on your behalf).

Requests can be made in any form i.e., in writing, email or letter. The organisation also supplies a form that can also be used electronically to support you to make a subject request.

Where requests are made to access your data, Lifeline Care Group will take the following steps:

- Provide you with a 'Subject Data Request form';
- No charges will be made by Lifeline Care Group for the supply of subject data unless, it is manifestly unfounded or excessive; or you request for further copies of your data following a request.

Lifeline Care Group will comply with the request without undue delay and at the latest within one month of receipt of the request. Under complex circumstances or in the event of numerous requests, an additional two months may be added to the response time.

### Changes to this Privacy Policy

Lifeline Care Group reserves the right to update this notice at any time and will provide you with a new notice when any substantial changes that are made.

### Making a complaint

You also have the right to complain if you feel, at any time, Lifeline Care Group have failed to safeguard your personal information.

In the first instance Lifeline Care Group would ask you to contact us on the following to allow us to investigate the matter thoroughly to identify any security issues.

<b>Name and Position:</b>	<b>Michael Kirkwood (CEO)</b> <b>Elizabeth De la Haye (Managing Director)</b> <b>Charles Stewart (Care Manager)</b>
<b>Telephone:</b>	<i>Tel: 01534 668334</i>
<b>Email:</b>	<a href="mailto:Michael@lifeline.je">Michael@lifeline.je</a> <a href="mailto:Elizabeth@lifeline.je">Elizabeth@lifeline.je</a> <a href="mailto:Charles@lifeline.je">Charles@lifeline.je</a>
<b>Address:</b>	<i>Address: De Carteret House, 7 Castle Street, St. Helier, JE2 3BT</i>

You do however have the right to lodge a complaint with the Jersey Information Commissioners Office (JICO), who are the Jersey's regulatory authority, if you believe we are not processing your data or respecting your rights relating to the handling of your information. Or if you feel we have not been able to resolve your complaint to your satisfaction.

You are entitled of course to contact the Jersey Information Commissioner's Office without first referring your complaint to us.

Jersey Information Commissioner's Office

Address: 2nd Floor, 5 Castle Street, St. Helier, Jersey, JE2 3BT

2nd Floor  
5 Castle Street  
St. Helier  
Jersey  
JE2 3BT  
Tel: 01534 716530  
Email: [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)  
Website: [Jersey Office of the Information Commissioner - Home \(jerseyoic.org\)](http://Jersey Office of the Information Commissioner - Home (jerseyoic.org))

If you want to access, review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us on the following contact details:

<b>Name and Position:</b>	
<b>Telephone:</b>	
<b>Email:</b>	
<b>Address:</b>	

### **Relevant Legislation**

- Data Protection (Jersey) Law 2018
- Freedom of information (Jersey) law 2011
- Human Rights (Jersey) Law 2000
- Capacity and self-determination Jersey Law 2016
- The Computer Misuse Act 1990
- Public Interest Disclosure Act 1998

### **Relevant Regulations**

Jersey Office of the Information Commissioner - Home ([www.jerseyoic.org](http://www.jerseyoic.org))

Office of the information Commissioner

Common Law Duty of Confidentiality

General Data Protection Regulation 2018 (GDPR)

[https://www.skillsforcare.org.uk/Documents/Topics/Digital-working/Information-sharing-](https://www.skillsforcare.org.uk/Documents/Topics/Digital-working/Information-sharing-for-social-care-employers.pdf)

[forhttps://www.skillsforcare.org.uk/Documents/Topics/Digital-working/Information-sharing-for-social-care-employers.pdfsocial-care-employers.pdf](https://www.skillsforcare.org.uk/Documents/Topics/Digital-working/Information-sharing-for-social-care-employers.pdf)

Information Sharing for Social Care Employers/ Skills for Care

<https://www.legislation.gov.uk/uksi/2000/2699/contents/made>

Telecommunications (Lawful Business Practice) (Interception of Communications)

Regulations 2000

### **Appendix**

Appendix 1

Lifeline Care Group Privacy Notice

Introduction

As a care provider, Lifeline Care Group (the Data Collector) are required to collect a variety of data to allow them to provide an efficient care service. The data concerned relates to

[Privacy Policy for Services Users](#)

information collected about either staff or clients for the purposes of the operations of the company and is done so in a respectful manner in compliance with Data Protection (Jersey) Law 2018.

### Your Personal Data

Data can be personal information about an individual such as details about their identity, their contact information, any health conditions and financial details. Some data is classed as special category information. These are some of the main subjects of data that the company would reasonably, and in some cases legally, be required to collect when introducing a new client to the service. It will be made clear at the beginning what information is required. Please note that if you do not wish to share certain bits of information that the service will need to provide a safe service, we may be unable to offer you, our services.

### Why we collect data

For Lifeline Care Group to provide a safe and responsive service to each client, we must collect relevant data to gain understanding and to create expectations for your care.

Information is used so that:

- Our carers have the correct information to provide the relevant service you will need including treatments, medication administration, personal care
- To contribute to company audits
- To ensure your care plan is updated so that all staff can ensure you receive the quality of care that you need
- To assist and contribute to any complaints made against the service provider

### Security

Legislation requires that information collected to always be relevant and to be kept safe and secure. All staff are regularly trained in data protection to ensure that accurate records are being documented appropriately and that personal data is handled correctly. Data is kept safe and by storing it either electronically secured by password or as a hardcopy locked away in filing cabinets.

Lifeline Care Group processes personal data and is governed by data protection laws including the Data Protection (Jersey) Law 2018, the Data Protection Authority (Jersey) and the General Data Protection Regulation (EU) 2016.

Lifeline Care Group complies with regulations when collating and using personal information.

In cases where a breach is made, Lifeline Care Group will follow the correct steps to comply with legislation. Breaches are logged on the internal breach log and breaches that are deemed high risk are reported to the JOIC within 72 hours. Should your information be involved in a high-risk breach, you will be informed immediately.

### Confidentiality

Personal data is confidential and is only collected and shared on a 'needs to know' basis meaning that professionals working together who depend upon information to fulfil their job role would only have access to relevant data about a person. All care/support staff and partnership agencies are bound by law and code of conduct to work within these parameters. When data is obtained from another agency, the person will be informed about this.

### Sharing

When information needs to be shared, permission is always sought from the individual with an explanation of why there is a need to share information about them. In certain cases, like safeguarding or reasons of the law, such as when others may be put at risk or are deemed in danger, then a person's consent to share information may be overridden however they will still be informed that the information needed to be shared and why.

Information for sharing may include:

- Personal, details such as age, gender, name, home address
- Health information
- Assessments and photographs
- Information held by other health care providers working in conjunction with Lifeline Care Group

### Storing

Data is to be up-to-date and reviewed by an appointed Data Protection officer. When data is no longer actively required then some of it may by law be required to be safely and securely archived. Retentions schedules for this guide the Data Protection officer in regularly maintaining archived data. Data that is no longer required is destroyed via a shredder or permanently deleted from electronic devices.

Regular email housekeeping is undertaken by all members of staff to ensure any data no longer required is deleted permanently.

### Compliance

The Data Protection officer is also responsible for responding to concerns about the handling of data within the company; investigating and reporting any occurrences to the Office of the Information Commissioner and working together with them in a cooperative and transparent way guided by their authority to take steps to improve data protection when/if identified.

### Serve users rights

- Updated with how your data is held, stored and processed
- Update the service provider with updated contact details
- The right to contact the DPO (Elizabeth@lifeline.je) to request any copies of your own information held on file



Further information can be found on the Jersey Office of the Information Commissioner website:  
[www.jerseyoic.org](http://www.jerseyoic.org)

### Complaints

If you have a concern or would like to make a complaint, please contact the Data Protection officer (details below) and it will be documented and dealt with in line with requirements of the Office of the Information Commissioner. Steps will be taken within guidance to rectify the situation and appropriate feedback will be provided.

#### Contact

Data Protection Officer:

*Address:*  
*De Carteret House,*  
*7 Castle Street,*  
*St. Helier,*  
*JE2 3BT*

Telephone: 01534 668334

Email: [Elizabeth@lifeline.je](mailto:Elizabeth@lifeline.je)