

DepenSys Ltd - Data Protection Policy

DepenSys Ltd understands how important data protection is to our clients. As nurses, our Directors are bound by a strict duty of confidentiality to their clients in line with the Nursing and Midwifery Council Code. Following the enhanced data protection laws that came into force in May 2018 we have reviewed the systems and procedures that we use to protect our clients' data.

This policy explains our approach to handling, storing and transferring the personal data you provide to us, so you can be confident that we apply appropriate measures to the protection of your personal data.

What information do we collect?

The DepenSys web based application collects personal data about care home residents for the following purposes:

- provision of consultancy services and advice,
- administrative reasons to enable us to provide our services and,
- to meet our professional duties to keep records of the work we do.

DepenSys Ltd will only collect and hold information or disclose it to someone else if we have a lawful and professional duty to do so.

Our cloud-based dependency system, DepenSys, allows clients to collect special category data to assist them to identify their residents' needs and convert this information into the care hours required and the 'skill mix' needed to meet each resident's needs effectively. The information held includes Category 9 data including the resident's name and categorisation of their needs. We hold necessary information on the clients themselves consisting of their company and care home names, addresses, email addresses and telephone contact details with the client's permission.

The Data Protection Principles

DepenSys Ltd is obliged to process all personal data in accordance with the data protection principles set out in the General Data Protection Regulation and the Data Protection Act 1998. This means that when we collect our clients and their residents' personal data we will:

- process it lawfully, fairly and transparently and for a legitimate reason – we will tell our clients why we are collecting it and what we are going to do with it. We will not do anything more with the data beyond this. We provide this information on our website and in our privacy notice.

- use it for the provision of consultancy services and advice to our clients.
- make sure the data we collect is adequate, relevant and is limited to what is necessary.
- do what is reasonable to keep it up-to-date. If it is inaccurate, out-dated or wrong, we will correct it or delete it. If you or one of your residents think the data is wrong, please tell us.
- only store it for as long as we need it. The length of time we keep your data is outlined in our privacy policy.
- keep it confidential and secure and not share it with any third party.

Our Website

Our website does not collect data that can identify you by name unless you contact via the email link.

Information Security

We will keep our client's information secure and have implemented organisational and technical measures to ensure this. All our devices (workstations, laptops) employ endpoint antivirus protection and are backed up regularly. All devices are password protected.

Training

As DepenSys Ltd are a very small company, the consultants take personal responsibility for the data we hold about our clients. We do not employ support staff. We have undertaken training on the GDPR and data protection principles.

Record security

DepenSys is a cloud-based database system with security built in to ensure security of all personal data recorded onto the system. These electronic records and backups are held within the UK.

Paper records are kept secure and will be kept for a period of 8 years after which they will be securely destroyed either by the consultants or a specialist document destruction company in line with GDPR principles.

Purposes of processing

Client data is required to manage the user and resident data in accordance with the calculation of care and nursing staff requirements within a residential care facility.

Client user data will be processed to facilitate the correcting recording of user activity and access to DepenSys.

Resident personal data will be processed to facilitate the calculation of care and nursing staff requirements within a residential care facility on a resident by resident basis.

Security measures for Personal Data

User Access Control (Super User, Director, Area Manager, Home Level)

Feature Access Control based on User Access Control Level

Data Anonymisation for users without appropriate view privileges

Data encryption to SHA3 Standards

SSL Connectivity

Sub-processors of Personal Data

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Application Developer

Data breaches

We will report and investigate any data breaches that have been detected. We will inform the individuals involved and the ICO.