**Drogheda Hospice Homecare Foundation**

**Data Protection Policy**

**Introduction**

Drogheda Hospice Homecare Foundation needs to gather and use certain information about individuals.

These can include clients, volunteers, suppliers, business contacts, Hospice members and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards — and to comply with the law.

**Why this policy exists**

This data protection policy ensures Drogheda Hospice Homecare Foundation:

* Complies with data protection law and follow good practice
* Protects the rights of all who’s data is held
* Is open about how it stores and processes individuals’ data
* Protects itself from the risks of a data breach

**Data protection law**

The Data Protection Act 2018 describes how organisations — including Drogheda Hospice Homecare Foundation— must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Article 5 of the General Data Protection Regulation (GDPR) sets out the key principles which lie at the heart of Data Protection. These say that personal data must:

1. Be processed lawfully, fairly and be transparent
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways

**People, risks and responsibilities**

**Policy scope**

This policy applies to:

* The Board of Drogheda Hospice Homecare Foundation
* All committee members of Drogheda Hospice Homecare Foundation
* All volunteers associated with Drogheda Hospice Homecare Foundation
* All contractors, suppliers and other people working on behalf of Drogheda Hospice Homecare Foundation

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 2018. This can include:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone numbers
* Plus any other information relating to individuals

**Data protection risks**

This policy helps to protect Drogheda Hospice Homecare Foundation from some very real data security risks, including:

* **Breaches of confidentiality.** For instance, information being given out inappropriately.
* **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
* **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

**Responsibilities**

Everyone who works for or with Drogheda Homecare Foundation has some responsibility for ensuring data is collected, stored and handled appropriately.

Each individual that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

* The **board of directors** is ultimately responsible for ensuring that Drogheda Hospice Homecare Foundation meets its legal obligations.
* The **[data protection officer], [name],** is responsible for:
	+ Keeping the board updated about data protection responsibilities, risks and issues.
	+ Reviewing all data protection procedures and related policies, in line with an agreed schedule.
	+ Handling data protection questions from anyone else covered by this policy.
	+ Dealing with requests from individuals to see the data Drogheda Hospice Homecare Foundation holds about them (also called ‘subject access requests’).
	+ Checking and approving any contracts or agreements with third parties that may handle the company’s sensitive data.

**General staff guidelines**

* The only people able to access data covered by this policy should be those who **need it for their work**.
* Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
* Members should keep all data secure, by taking sensible precautions and following the guidelines below.
* In particular, **strong passwords must be used** and they should never be shared.
* Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
* Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.

**Data storage**

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper,** it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
* Members should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
* **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

* Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
* If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
* Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company’s standard backup procedures.

**Data use**

Personal data is of no value to Drogheda Hospice Homecare Foundation unless the Hospice can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

* When working with personal data, members should ensure that information is not leftunattended.
* Personal data **should not be shared informally**.

**Data accuracy**

The law requires Drogheda Hospice Homecare Foundation to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Drogheda Hospice Homecare Foundation should put into ensuring its accuracy.

It is the responsibility of all members who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

* Data will be held in **as few places as necessary.** Members should not create any unnecessary additional data sets.
* Members should **take every opportunity to ensure data is updated.** For instance, by confirming a clients details when they call.
* Data should be **updated as inaccuracies are discovered**. For instance, if a client can no longer be reached on their stored telephone number, it should be removed from the database.

**Subject access requests**

All individuals who are the subject of personal data held by Drogheda Hospice Homecare Foundation are entitled to:

* Ask **what information** the company holds about them and why.
* Ask **how to gain access** to it.
* Be informed **how to keep it up to date.**
* Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the Hospice requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at [email address]. The data controller can supply a standard request form, although individuals do not have to use this.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

**Disclosing data for other reasons**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Drogheda Hospice Homecare Foundation will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company’s legal advisers where necessary.

**Providing information**

Drogheda Hospice Homecare Foundation aims to ensure that individuals are aware that their data is being processed, and that they understand:

* How the data is being used
* How to exercise their rights

To these ends, the company has a confidentiality statement, setting out how data relating to individuals is used by the company.

Drogheda Hospice Homecare Foundation respects your right to privacy and complies with its obligations under the General Data Protection Regulation

 **Drogheda Hospice Homecare Foundation Website Privacy Policy**

(GDPR). The goal of this website privacy policy is to help you understand how the charity deals with any personal data you provide when you visit its website or interact with the charity online.

By visiting droghedahospicehomecarefoundation.org website, you are accepting the terms of this website privacy policy.

This website contains external links to other websites and the charity is not held responsible for the privacy policies of these other websites.

**What type of information do we collect?**

You may browse our site anonymously but certain functions and pages may be unavailable to you.

We collect information from you when you visit our website, register for our online community, place an order or make a donation, subscribe or fill out a form.

When making a donation, registering for a campaign or event, as appropriate, you may be asked to provide personal details such as name, email address, postal address, phone number or payment information as needed.

**What do we use your information for?**

The information we collect from you may be used in one of the following ways:

### To provide cancer information and support services

### We collect and store personal data in order to provide services for people affected by cancer.

We may also use this information for training, quality monitoring or evaluating

 the services we provide.

We may also collect and retain your data if you send feedback about any of our

services or make a complaint.

### To process payments

Example: Donating online, or paying an event registration fee. We will use your information to complete your order and to follow up, where relevant or requested, by email, phone or post on any transactions and issue payment receipts.

### To improve our website and provide a personalised experience for you

We continually try to improve our website based on the anonymous information and feedback we receive from you.

We want your visit to our website to be a useful one, making sure you are able to find the information that you’re looking for and that is relevant to you.

### To keep you informed about what’s happening.

This is in regard to any updates or changes to our services that may be relevant to you

### To let you know other ways you can get involved in our fundraising and campaigns.

From time to time we will use your postal address to let you know how you can get involved in our fundraising and campaigns.

We may also contact you by phone and email if you have given us consent to do so.

We will always respect your privacy and will always give you the option to stop hearing from us.

### To communicate Drogheda Hospice Homecare Foundations messages to you through other media channels.

We may use your information to communicate Drogheda Hospice Homecare Foundation messages to you through other media channels. For re-marketing and advertising purposes across other online channels like Facebook, Google, Twitter, etc., where your information will be kept safe and secure and not shared with any further third parties. At any time you can request your information not be shared with these channels by sending a request to droghedahospicehomecare@gmail.com.

**How do we protect your information?**

We use a variety of security measures to securely process and keep your personal information safe when you interact with our website.

We use a secure server so that all supplied sensitive/payment information is transmitted and then encrypted into our payment gateway provider's database. We do not see or store your full card details when you make an online transaction.

Drogheda Hospice Homecare Foundation takes, and will continue to take, all reasonable steps (which includes relevant technical and organisational measures) to guarantee the safety of the data you provide to us and we will only use the data for the intended purpose. However, the nature of the internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet will be 100% secure.

**Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. The information you provide when interacting with our website will be kept securely and used by Drogheda Hospice Homecare Foundation in order to make your interaction with the charity possible. Your information will only be shared with selected third party service providers, contracted by Drogheda Hospice Homecare Foundation to assist with our programmes. Your information will not be shared with any other organisation, other than with your permission, or where required by law.

We also reserve the right to enforce our site policies in order to protect our rights and the rights of other individuals in a manner that is safe and compliant with the law.

Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses. For example, we may disclose the total number of visits to our website.

**You control your information**

Drogheda Hospice Homecare Foundation is committed to upholding the rights of individuals and have processes in place for providing individuals' access to their personal information. A subject access request (SAR) is a request for access to the personal information that Drogheda Hospice Homecare Foundation holds about you, which we are required to provide under the General Data Protection Regulation (GDPR) unless an exemption applies.

You can make this request in writing or by email to The Data Protection Officer in the Drogheda Hospice Homecare Foundation (see contact details below).

Where requested, we will provide the following information:

* The purposes of the processing of your personal data;
* What kind of personal data is stored;
* Where this data is stored;
* How long your data is stored.

Your request will be completed and forwarded to you by mail within 30 days.

**Your consent**

By using our website, you consent to our website’s privacy policy

**Changes to our privacy policy**

We reserve the right to make changes to our web privacy policy at any time without prior consultation; these changes will be posted on this page together with privacy policy revision date.

**Contacting us**

If you have any questions regarding this privacy policy, you may contact us using the information below.

The Data Protection Officer

Drogheda Hospice Homecare Foundation

Tel: 086 3264825

Email: droghedahospicehomecare@gmail.com