



**St Lawrence Surgery, Patient Participation Group, Charity Number: 1064542**

## **St Lawrence Surgery PPG Data Protection Policy**

### **Context and overview**

#### **Key details**

Policy prepared by: Chris Moon-Willems(Chairman)  
Approved by PPG Committee on: Date 03.05.2018  
Next review date: Date 03.05.2019

### **Introduction**

St Lawrence Surgery Patient Participation Group (PPG) Committee needs to gather and use certain information about individuals.

These can include, PPG Committee Members, and other people it 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 PPG's data protection standards and to comply with the law.

### **Why this policy exists**

This data protection policy ensures St Lawrence Surgery PPG:

- Complies with data protection law and follows good practice
- Protects the rights of PPG Committee members and other patients
- 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 1998 describes how organisations, including St Lawrence Surgery PPG must collect, handle and store personal information.

These rules apply regardless 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.



The Data Protection Act is underpinned by eight important principles they say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up-to-date
- Not be held for any longer than necessary
- Processed in accordance with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area (EEA) unless that country or territory also ensures an adequate level of protection

### **Policy Scope**

This policy applies to:

- All Committee members of the St Lawrence Surgery PPG
- All suppliers and other people working on behalf of the PPG

It applies to all data that the PPG Committee holds relating to identifiable individuals even if that information technically falls outside of the Data Protection Act 1998. 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 St Lawrence Surgery PPG from some very real data security risks, including:

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



## **Responsibilities**

Everyone who works for, or with, St Lawrence Surgery PPG Committee has some responsibility for ensuring data is collected, stored and handled appropriately.

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

The PPG committee is ultimately responsible for ensuring that the PPG meets its legal obligations.

The PPG committee chairman, acting as Data Protection Officer, is responsible for:

- Keeping the Committee updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and related policies
- Handling data protection questions from PPG Committee members and anyone else covered by this policy
- Dealing with requests from individuals to see data the PPG Committee holds about them
- Checking and approving any agreements with third parties that may handle the PPG's sensitive data

## **General 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, Committee members can request it from the Chairman.
- Committee 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 in the PPG 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.

When not required, the paper or files should be kept in a locked drawer or filing cabinet where unauthorised people cannot see it.

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

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- All paper records should be shredded and disposed of securely when no longer required
- Paper and printouts should not be left where unauthorised people could see them (like on a printer)

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, never shared, and be kept in a secure location
- If data is stored on removable media e.g. USB sticks then they should be kept locked away securely when not being used.
- Data should be backed up frequently
- All computers containing data, should be protected by security software and a firewall.

## **Data Use**

Personal data is of no value to the PPG unless it 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, the screens of computers should always be locked when left unattended
- Personal data should not be shared informally. In particular it should never be sent by email as this form of communication is not secure.
- Data must be password protected before being transferred electronically



## **Data accuracy**

The law requires St Lawrence Surgery PPG 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 effort the PPG should put into ensuring its accuracy.

It is the responsibility of all PPG 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. PPG members should not create any unnecessary additional data sets.
- PPG members should take every opportunity to ensure data is updated. For example when their personal details change.
- The PPG will make it easy for the data subject to update the information the PPG holds about them.
- Data should be updated as inaccuracies are discovered. For instance, if a PPG member can no longer be reached on their stored telephone number, it should be removed from the database.

## **Subject access requests**

All PPG Committee members who are the subject of personal data held by the PPG are entitled to:

- Ask what information they hold about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how the PPG is meeting its data protection obligations.

If a PPG member contacts the chairman requesting this information, this is called a subject access request.

Subject access requests from a member should be made by email, addressed to the PPG chairman at [ppg@stlawrencesurgery.com](mailto:ppg@stlawrencesurgery.com)

The chairman will 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 the PPG will disclose requested data. However, the chairman will ensure the request is legitimate, seeking advice where necessary.

### **Providing information**

The St Lawrence Surgery PPG aims to ensure that its members are aware data is being processed and that they understand:

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

To these ends, the St Lawrence Surgery PPG has a privacy statement setting out how data relating to individuals is used by the PPG. This is available on the PPG area of the St Lawrence Surgery website.