

UK General Data Protection Regulation (GDPR) Policy

1. Introduction

West Heanton Ltd is committed to ensuring the security, confidentiality and lawful handling of all personal information we process. We adopt a consistent, compliant approach to data protection in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We recognise that we process sensitive personal data relating to Service Users, staff, contractors and visitors, and we take our responsibilities seriously.

2. Scope

This policy applies to:

- All personal data processed by West Heanton Ltd
- All staff, volunteers, contractors and temporary workers
- All systems, processes and activities involving personal data

Compliance with this policy is mandatory. Failure to comply may result in disciplinary action.

3. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Special Category Data

Sensitive data requiring additional protection, including:

- Health information
- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation
- Biometric data

Processing

Any operation performed on personal data, including collection, storage, sharing, or deletion.

4. Data Protection Principles

West Heanton Ltd processes personal data in accordance with the following UK GDPR principles:

- **Fair, lawful and transparent processing**
- **Purpose limitation** — data is collected for specific, explicit and legitimate purposes
- **Data minimisation** — only data necessary for the purpose is collected
- **Accuracy** — data is kept accurate and updated
- **Storage limitation** — data is retained only as long as necessary
- **Integrity and confidentiality** — data is processed securely
- **Accountability** — we demonstrate compliance through documentation, audits and training

5. Lawful Bases for Processing

West Heanton Ltd processes personal data under one or more of the following lawful bases:

- **Consent**
- **Contract**
- **Legal obligation**
- **Vital interests**
- **Public task**
- **Legitimate interests**

Special category data (e.g., health information) is processed under:

- Health and social care obligations
- Employment obligations
- Vital interests
- Explicit consent

6. Data Subject Rights

Individuals have the following rights under UK GDPR:

- **Right to be informed**
- **Right of access**
- **Right to rectification**
- **Right to erasure**
- **Right to restrict processing**
- **Right to data portability**
- **Right to object**
- **Rights relating to automated decision-making and profiling**

Requests will be responded to within **one month**.

7. Data Protection Officer (DPO)

West Heanton Ltd has appointed a Data Protection Officer responsible for:

- Overseeing compliance
- Advising on data protection matters
- Monitoring policies and audits
- Acting as the point of contact for the ICO and data subjects

Contact: office@westheanton.co.uk

8. Data Retention & Deletion

West Heanton Ltd maintains a **Data Retention Schedule** that sets out how long different categories of data are kept.

Data is:

- Retained only as long as necessary
- Reviewed regularly
- Securely deleted or anonymised when no longer required

9. Data Sharing & Processors

Personal data may be shared with:

- Health and social care professionals
- Regulatory bodies
- Contractors providing services to West Heanton Ltd

All data processors must:

- Demonstrate compliance with UK GDPR
- Use appropriate security measures

10. Security Measures

We use appropriate technical and organisational measures to protect personal data, including:

- Access controls
- Encryption
- Secure storage
- Staff training
- Confidentiality agreements

11. Breach Notification

All data breaches must be reported immediately to the DPO.

West Heanton Ltd will:

- Assess all breaches
- Document all breaches
- Report notifiable breaches to the ICO within 72 hours
- Inform affected individuals where there is a high risk to their rights and freedoms

12. Staff Responsibilities

All staff must:

- Follow this policy
- Complete mandatory data protection training
- Report data breaches immediately
- Handle personal data securely
- Maintain confidentiality at all times

13. Policy Review

This policy will be reviewed annually or sooner if legislation or best practice changes.

14. Contact Us

For questions or concerns about this policy or how we use personal data, contact:

Data Protection Officer

Email: office@westheanton.co.uk