

## PROCEDURES FOR DATA HANDLING & STORAGE

*These should be read in conjunction with Wellspring's Data Protection Policy*

Data processed by Wellspring include that relating to individual and organisational clients, staff (employed and self-employed), trainees, volunteers, members/subscribers/friends, members of the Management Committee, renters, and customers and suppliers.

Data is kept confidentially and for no longer than is needed for the purpose for which it was originally collected. It is available within the organisation on a "need to know" basis in order to ensure the efficient running of the service. Compliance with Data Protection legislation is the responsibility of all members of Wellspring who process personal information.

### PAPER RECORDS

#### Clients

Paper data relating to individual clients include:

- The client's signed consent that data and confidential records may be kept.
- The client's completed Application Form.
- The client's signed Medical Consent form.
- The client's letter of application. Once a client has been allocated a therapist, the therapist will be responsible for the safe keeping of this letter.
- Any letter of referral, or of information about the client which the client has requested.
- Records of attendance (indicated on the therapist's claim form).
- Any additional form, survey or questionnaire that Wellspring has asked the client to complete.
- Any report for the purposes of monitoring and evaluation that the therapist has been asked to complete.
- Appointment and message records.

Note: Any personal notes relating to clients made by therapists are held securely by them and not retained by Wellspring.

Paper data relating to organisational clients include:

- Tendering proposals.
- Contracts.
- EAP Annual Reports and any additional reports.
- Staff lists supplied by the organisation.

### **Employed & self-employed staff, volunteers and trainees**

Paper data relating to staff include:

- Staff list of names, addresses and contact numbers.
- Completed job/placement application forms.
- References.
- Appraisal reports.
- Details of therapists' professional indemnity insurance.
- Confirmation of therapists' supervision.
- Therapists' claim forms.
- Minutes of meetings and discussions.
- Police check/disclosure information.

### **Management Committee**

Paper data relating to Management Committee members include:

- List of names, addresses and contact numbers.
- Biographical information.

### **Renters**

Paper data relating to renters include

- Completed application forms, CVs.
- References.
- Rental payments.

## **COMPUTER RECORDS**

### **Clients**

Computer data relating to individual clients include:

- Clients' names, addresses, contact numbers.
- Summary records, derived from application forms and application letters and any referral letters.

Computer data relating to organisational clients include:

- Tendering proposals.
- Contracts.
- EAP Annual Reports and any additional reports.
- Statistical records deriving from therapists' intake/closure forms and client questionnaires.

### **Employed & self-employed staff, volunteers and trainees**

Computer data relating to staff include:

- Appraisal reports
- Minutes of meetings and discussions

### **Members/subscribers/Friends**

Computer data relating to this category include:

- Names, addresses and contact numbers held in a database.

### **Management Committee**

Computer data relating to the Management committee include:

- Names, addresses and contact numbers.

### **Customers and Suppliers**

Computer data relating to customers and suppliers include:

- Names, addresses and contact numbers held on the Sage Accounting Package.

## **SECURITY**

### **Protecting information**

- Wellspring accepts responsibility for protecting the data with which we are supplied. We strive to ensure that information is not used in any unauthorised or unlawful way.
- All staff are responsible for ensuring that any personal data (on others) which they hold are kept securely and that they are not disclosed to any unauthorised third party.
- Records kept must be accurate and up to date. It is the responsibility of both administrative staff and therapists to ensure the accuracy and updating of records when necessary.
- Records must be kept to the *minimum* necessary for the purpose for which they are collected.
- Records must be destroyed as soon as they are no longer necessary for the purpose for which the information was gathered, and in accordance with the procedures below.
- Both paper and computer records must be kept physically secure.
- Wellspring procedures must be followed when responding to client requests for access to records.
- Wellspring confidentiality guidelines must be followed in relation to any disclosure of information.
- No unauthorised persons are allowed in the office.
- Unauthorised persons must not be left alone with personal data.
- Staff are trained at induction on data security and are instructed on what they may or may not have access to.

### **Security of paper records**

- Paper data are kept securely in lockable storage units in the main office or in the office of the Co-ordinator of Clinical Services.
- When staff are absent from the office any personal data must be locked away.
- Paper data relating to clients, including their application form and consent forms, are kept in A4 plastic file binders in locked units accessible only to the Administrator.
- Receipts and invoices, including therapists' claim forms are stored in the same way along with other financial records.
- Paper data relating to organisational clients are kept in locked cabinets.
- Personal information relating to therapists, trainees, volunteers and other staff is kept in cabinets which must be locked when administrative staff are absent from the office.
- Police check information is processed according to the requirements of Disclosure Scotland.

### **Security of computer records**

#### **Passwords**

- Computer data are held on password protected PCs. The client database is also password protected. Passwords are known only to the Administrator, the Clinical Co-ordinator and one therapist, and are changed every three months or after any temporary staff leave.

#### **Internet Protection**

- A router is installed that acts as a secure gateway between the Wellspring network and the internet.
- All PCs have antivirus/firewall software installed and are programmed to update this software automatically each week.
- Clients will only be emailed if they initiate the correspondence, or if they authorise it.

#### **Back-up**

- The hard drive on the main PC is backed up weekly on to a zip drive disk. This disk and any floppy disks containing sensitive data are locked in a secure unit accessible only by the Administrator.

#### **Client Anonymity**

- Identifying personal details such as names, addresses and contact numbers are held separately from the coded summary record made for operational purposes and statistical analysis.
- The data derived from client records may be published in Wellspring's Annual Report or included in reports to organisational clients. Care is taken that no individual can be identified.

## **RETENTION OF DATA**

### **Clients**

- Individual client files, paper or electronic, must be regularly reviewed and kept for no longer than 7 years after the ending of therapy.
- Other information relating to clients, such as therapist claim forms, which include client names, appointments and message records, are kept for no longer than one year.
- Emails from clients are kept for no longer than strictly necessary.
- BIHC/DNA personal information (which may include a completed application form and application letter) is destroyed after three months.
- Organisational clients' Contracts, Annual Reports and any other reports and correspondence will be held no longer than necessary, and for no more than three years after the contract has ended.

### **Staff** (employed, self-employed, trainees & volunteers)

- Information on individual members of staff will be retained after they have left Wellspring only when deemed appropriate and will be destroyed whenever their usefulness expires.
- Information relating to unsuccessful applications for employment, membership of the therapists' team, or placement will be destroyed within twelve months unless Wellspring is given permission to keep the information on file. A record of names of individuals who have applied for, been short-listed or interviewed for posts may be kept indefinitely.

### **Management Committee**

- Records are kept for no longer than necessary and usually no longer than three years after retiral.

### **Members/subscribers/Friends**

- These records are renewed annually.

### **Customers and suppliers**

- Information held on the Sage Accounting Package is retained for seven years.

### **Police check information**

- This is held and destroyed in accordance with the requirements of Disclosure Scotland.

## **SAFE DISPOSAL OF DATA**

### **Paper records**

- Personal data are destroyed by shredding whenever their usefulness expires and certainly within the timescales stipulated above.

**Computer records**

- Computer records containing personal data are deleted completely from the system by means of emptying the recycle bin.
- When computers become obsolete records must be professionally deleted using data erasure software (such as East-Tec Eraser or CyberScrub Professional) or removed professionally to prevent information from falling into unauthorised hands.