



ELIZABETH DOWELL'S ALMSHOUSE TRUST

Office at Dowell's Close, Moseley

Birmingham, B13 8ES

manager@dowellstrust.org.uk

0121 442 6633 | 07913 103239

DATA PROTECTION POLICY (CONFIDENTIALITY AND ACCESS TO RECORDS POLICY)

1. Introduction

This policy outlines the processes in place at Elizabeth Dowell's Trust for managing data kept on site.

2. Legislation and regulatory framework

- 2.1 Data Protection Act 2018
- 2.2 Public Interest Disclosure Act 1998
- 2.3 GDPR 2019

3. Monitoring and review

3.1 This procedure will be reviewed every year unless amendment is prompted by a change in legislation, operational requirements or customer feedback.

4. Information which might be classed as confidential.

4.1 The scheme manager is responsible for identifying information that is classed as confidential within the scheme.

4.2 The likely areas to be considered for classification as Confidential are:

- Resident files, including support plans, personal information and next of kin details.
- Staff records, including personal details, supervision records, contract details.
- Any business sensitive material.

5. General issues of confidentiality

5.1 Due to the nature of services provided, including the need to ensure effective response is given in the event of health emergencies, it is essential that staff share personal data with relevant organisations, for example Appello Careline 365 or emergency health services.

5.2 The manager should ensure that residents and staff are aware that, whilst the staff will treat received information as confidential, the manager has a legal duty to disclose information to an enforcing agency, when such agency has a right to access such information.

5.3 The scheme manager must explain to every resident how their information will be stored, used and what information is shared with other organisations.

5.4 All information kept relating to a resident should be factual.

5.5 Information is shared within Elizabeth Dowell's Trust, as is necessary for the effective delivery of services, in line with best practice.

5.6 Information should be updated on a regular basis and any redundant data deleted appropriately.

- Residents' file's will be completely destroyed after three years of the resident leaving or passing away.
- Records of complaints/investigations concerning residents will be destroyed six years after the resident leaves or passes away.
- Application forms for unsuccessful applicants will be destroyed three years after the date of application.
- Trustees personal files will be destroyed one year after ceasing to be a trustee.



ELIZABETH DOWELL'S ALMSHOUSE TRUST

Office at Dowell's Close, Moseley

Birmingham, B13 8ES

manager@dowellstrust.org.uk

0121 442 6633 | 07913 103239

- Staff personal files will be destroyed 6 years after employment ceases.
- Any personal info e.g. name shown in financial reports and correspondence will be destroyed in line with statutory retention periods.

5.7 Residents are requested to sign an Authority to Disclose Information form on moving in to Dowell's Close (see Appendix)

6. Paper records

6.1 Paper records which contain personal information about staff or residents should be stored securely.

6.2 Access to such records must be restricted to those authorised to access them.

6.3 Reproduction of information should only be undertaken with the authorisation of the scheme manager.

7. Electronic records

Access to the Trust's computer-based information is strictly controlled and only given to authorised Trust officers.

8. Telephone

8.1 Confidential information should not be given over the phone except in exceptional circumstances:

- In the event of a health emergency or risk to well-being of an individual
- When the individual has consented to / instructed telephone contact with another agency or individual.
- Where there is no other practical means by which the information can be relayed.

8.2 The staff member relaying information over the telephone must satisfy themselves of the identity of the individual they are giving the information to.

9. Verbal

9.1 In conversation with a resident, staff should never make reference to another resident's personal information.

9.2 The scheme manager must ensure all staff are aware of the need to respect the content of conversations with third parties.

9.3 Staff should not conduct conversations, which may be of a confidential nature, in areas where such conversations may be overheard by others.

10. The right to access information

10.1 Residents have the right to access information held in any format that relates to them.

10.2 Residents can access information held by requesting such from the scheme manager in writing and should usually expect access within three working days.

10.3 Enforcement agencies have a right to request access to information, for example if they believe a crime has been committed.

10.4 If the manager is unsure about a request to view information from another agency, they should seek guidance from the Chair of Trustees.



ELIZABETH DOWELL'S ALMSHOUSE TRUST

Office at Dowell's Close, Moseley

Birmingham, B13 8ES

manager@dowellstrust.org.uk

0121 442 6633 | 07913 103239

This policy has been approved for issue by the Board of Trustees of Elizabeth Dowell's Trust

A handwritten signature in black ink that reads "C.T. Wall". The signature is written in a cursive style with a long, horizontal flourish underneath the name.

Signed:

Name: Charles Wall

Date: ...April 2025

Review date: April 2026

Appendix: Authority to Disclose Information Form



ELIZABETH DOWELL'S ALMSHOUSE TRUST

Office at Dowell's Close, Moseley

Birmingham, B13 8ES

manager@dowellstrust.org.uk

0121 442 6633 | 07913 103239

AUTHORITY TO DISCLOSE INFORMATION

The Data Protection Act 1998 describes how organisations including Elizabeth Dowell's Trust must collect, handle and store personal information.

Our internal policy seeks to ensure that we comply with the.. Act. A copy of our Confidentiality & Access to Records policy is available upon request.

Name:.....

Address:.....

Tenancy Start Date:.....

Elizabeth Dowell's Trust may need to contact other agencies for information about you/your family.

I/we give Elizabeth Dowell's Trust permission to contact relevant agencies (e.g. Social Services, Police) during my/our tenancy with Elizabeth Dowell's Trust.

I/we understand that any information held on file about me/my family is confidential and will only be disclosed to relevant agencies and Trustees on a strict need-to-know basis.

I/we understand that Elizabeth Dowell's Trust has the right to recover any property occupied by me if I/we have knowingly given any false information.

Print Name(s):.....

Signed:.....

Witnessed by:.....(Scheme Manager)

Date:.....