



Policy code:

Data protection and GDPR

Welly's Work Place LTD and Sunny Skies Enterprise CIC

Policy # Updated: December 2024 Policy lead:

Printed versions are not controlled. Large type and digital copies of all policies, information, posters, procedures and forms can be supplied if required.

General statement of policy

In line with The Data Protection Act 2018 (DPA18), Welly's Work Place LTD and Sunny Skies Enterprises CIC are committed to protecting the personal data they hold and to use it responsibly. As part of this, Welly's Work Place LTD and Sunny Skies Enterprises CIC acknowledges that it must abide by the UK General Data Protection Regulation (GDPR) which sits alongside the Act.

Personal Data is anything that can be traced to a living person, this includes the majority of our record-keeping, such as our contact information, support plans and accident forms.

Policy objectives

- To outline how Welly's Work Place LTD and Sunny Skies Enterprises CIC will meet its obligations under The Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR)
- To outline our processes and procedures for collecting and storing personal data
- To outline our processes and procedures for responding to data breaches
- To explain your rights in relation to your personal data

Definitions

Personal data: Personal Data is anything that can be traced to a living person, such as date of birth, address, and health information. This, therefore, includes most of our record-keeping, such as our support plans, emergency grab sheets. accident forms, and employee records.

Data processing: Everything we do with your personal data counts as processing it, including collecting, storing, amending, transferring and deleting it. We are therefore required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.



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GDPR principles

Welly's Work Place LTD and Sunny Skies Enterprises CIC are committed to processing personal data in accordance with the 7 key principles set out in UK GDPR law. These are:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

The personal information we collect

Across Welly's Work Place LTD and Sunny Skies Enterprises CIC we require personal information in order to deliver our services. Examples include:

- Health and care information for the people we support through our adult social care services
- Employee bank details for payroll
- Email addresses of people who have asked to receive updates about our events and activities.
- Address and contact details of customers who order products from our social enterprises.
- Any other information about our customers, service users', their family and and our employees that is required by Welly's Work Place LTD or Sunny Skies Enterprises CIC to enable us deliver a safe, professional and efficient service.

Why we collect and use your personal information

We process your information in different ways under the following legal bases:

- Where processing is conducted with your consent for specified purposes
- Where processing is necessary for the performance of our contracts
- Where processing is necessary for us to demonstrate compliance with the law and regulatory frameworks
- When processing in pursuit of legitimate interests for:



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- Responding to enquiries and other communications with customers and 3rd parties
- Corporate due diligence, engagement, service development and innovation
- When processing special category (sensitive) data concerning health and biometrics, as is necessary for the provision of social care or the management of social care systems and services on the basis of Domestic Law or pursuant to contract with a health professional and subject to the conditions and safeguards set out in [legislation](#)

Consent

Where required, we will obtain explicit consent from individuals before processing their data. Individuals can withdraw consent at any time by emailing admin@wellysworkplace.co.uk.

Data sharing

For **users of our adult social care services**:

We share appropriate information with:

- External social and health care professionals and any individuals that you nominated as your representative or who have a legal entitlement.
- Law enforcement authorities on request or following a court order
- Public bodies that require evidence of our compliance with contractual obligations and to satisfy regulatory frameworks.
- Local safeguarding Advisory Boards (SAB) regarding issues and concerns.
- Staff and self-employed tutors who require information in order to provide you with a safe and effective service.

For **customers of our social enterprises and other stakeholders**:

We will not share personal data with third parties unless required by law, necessary for our business operations, or with the individual's consent.

Procedures for storing personal data

For **users of our adult social care services**:

We will retain your information for seven (7) years from our last point of contact, or as long as stipulated by the regulatory bodies. We retain your information for this period in



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case any issues arise or in case you have any queries. Your personal data will be kept securely at all times. Following the end of the retention period, your files and personal data we hold about you will be permanently deleted or destroyed. If we are required to obtain your consent to process your personal data, any information we use for this purpose will be kept until you withdraw your consent, unless we are entitled to retain the personal data on the basis of other grounds set out in the Data Protection Legislation.

For customers of our social enterprises and other stakeholders:

We will retain personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, accounting, or reporting requirements.

Your rights

Under data protection law, you have rights including:

Your right of access –

You have the right to ask us for copies of your personal information.

Your right to rectification –

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure –

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing –

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing –

You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability –

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.



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Responding to data breaches

In the event of a personal data breach, Welly's Work Place LTD and Sunny Skies Enterprises CIC are committed to following the guidance set out by the Information Commissioner's Office (ICO). This includes investigating what has happened, containing the breach, assessing the risk, taking action to protect individuals affected, and submitting a report (if required).

It is the **responsibility of the management team** to handle data breaches. This includes speaking to the individuals who have been affected by the breach and submitting reports in line with legislation.

Training procedures

It is the responsibility of the management team to ensure that all staff, volunteers, self-employed tutors and contractors are competent in protecting personal data in line with data protection and GDPR legislation.

All staff and volunteers will receive data protection and GDPR in their induction and ongoing training and development plan.

Questions and concerns

If you have any questions or concerns about how we collect, process or use your personal data, please contact us using the details below:

Email: admin@wellysworkplace.co.uk

Phone: 07495 416523

Postal address: 26 Burdetts Close, Great Dalby, Melton Mowbray, United Kingdom, LE14 2EN

If you have any questions or concerns that we do not resolve entirely to your satisfaction, then please refer to the Information Commissioner's Office website: <https://ico.org.uk/>

Related documents

- Photos and videos for social media consent form

Policy audit information

Policy lead: Lauren Stacey

Policy lead's job title: Operations Manager

Review log:



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Review Date:	Reviewed By:	Review Due:
17/12/2024	Created by Lauren	
06/01/2025	Woody	06/01/2026