



## GDPR/Data Protection Statement

At TogetherCare, we take the protection of personal data seriously. We are fully committed to meeting the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As a provider of care services that involve handling sensitive information, we have embedded strong technical and organisational measures to ensure the confidentiality, integrity, availability, and resilience of all data entrusted to us.

### **How We Protect Your Data**

We have implemented a wide range of controls and systems to protect both digital and physical information:

#### **Technical Measures**

- We use Birdie, a care management system certified to ISO 27001, with AES-256 encryption for data in transit and at rest.
- Access to sensitive data is protected through multi-factor authentication and role-based permissions.
- Our systems are secured with firewalls, antivirus software, and intrusion detection tools.
- All critical data is backed up daily on GDPR-compliant UK servers.
- Our Business Continuity and Disaster Recovery plans include tested procedures to recover data swiftly in the event of disruption.

#### **Organisational Measures**

- All staff complete GDPR training at induction and receive annual refreshers on confidentiality, consent, and subject access rights.
- Our dedicated Data Protection Lead, Michael Burke, oversees compliance and manages requests relating to personal data.
- Regular internal audits are conducted to ensure systems and practices remain compliant and secure.

### **Respecting Your Rights**

TogetherCare actively upholds the rights of all data subjects, including service users and staff. We provide clear and accessible Privacy Notices that explain:

- What personal data we collect and why
- How we store, use, and share it
- Your rights under data protection law

We have clear procedures in place to handle Subject Access Requests (SARs), data corrections, erasure, and objections. We also offer information in accessible formats (e.g., Easy Read) where needed, to ensure everyone can give informed consent.

### **Consent and Lawful Processing**

While some of our data processing is required to deliver care under contract or by law, we also ask for explicit consent where appropriate — such as sharing information with family members, GPs, or third-party services.

Our approach to consent ensures it is:



- Informed
- Freely given
- Specific to the purpose
- Clearly recorded and reviewed regularly

Where consent is not the legal basis, we apply “legitimate interests” or “legal obligation” principles in line with ICO guidance.

### **Data Storage and International Transfers**

All care-related data is securely hosted within UK-based data centres. We do not routinely transfer data outside of the UK or EU. If international transfers ever become necessary, we will ensure:

- Use of providers covered by an adequacy decision
- Standard Contractual Clauses (SCCs) are in place
- Transfer Risk Assessments (TRAs) are completed
- Our Data Protection Impact Assessment (DPIA) is updated

### **Record Keeping and Accountability**

We maintain a comprehensive Record of Processing Activities (ROPA) that covers:

- Types of data we collect
- Our lawful basis for processing
- How long we retain information
- Where and how it is stored or shared

This log is reviewed every six months and whenever we undergo significant changes in our services or contracts.

### **Ongoing Improvement and Testing**

To continually improve and ensure best practice, we:

- Conduct Data Protection Impact Assessments (DPIAs) before launching new systems or partnerships
- Perform regular audits and secure data disposal checks
- Undertake annual penetration testing through an external cyber security firm
- Maintain a data breach log and review outcomes through governance meetings
- Complete the NHS Data Security and Protection Toolkit (DSPT) annually at the “Standards Met” level

### **Our Promise to You**

TogetherCare’s approach to data protection is proactive, transparent, and embedded into every level of our care delivery. We will always:

- Keep your information safe and secure
- Only use it for the intended purpose
- Make it easy for you to access or update your data
- Uphold your rights at all times



If you would like more information or wish to make a data request, please contact our DSL

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