GDPR Recommendations

Page Contents

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18/06/2019	Hannah Bues	CareFree 5.5	V5

Introduction

General Data Protection Regulation (GDPR) became enforceable on May 25, 2018. CareFree Management Ltd has made changes to meet all the necessary requirements and we are here to help you meet them too.

This guide will inform you of the capabilities our system has in terms of storing personal data; It will cover your staff, your clients, finance and user security. In the main, the guide will focus on personal data. This is information that relates to a natural person or data subject which allows them to be identified directly or indirectly. For example, a name, ID number, IP address or health information.

The guide will intend to help you minimise the risk of a personal data breach. A breach can happen to any company that's transmitted, stored or otherwise processed data. A personal data breach can be defined as a breach of security which leads to:

1. Access of personal data
2. Unlawful destruction of personal data
3. Loss of personal data
4. Change of personal data
5. Unauthorised disclosure of personal data.

Recommend ended retentions periods can be guided by the following link to the ICO governing body. The ICO has provided a number of resources relating to legalities for the health and social care sector. You may decide to enforce different retention periods based on your own company policies.

The link to the website is as follows:

https://ico.org.uk/for-organisations/in-your-sector/health/

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/

We hope you find this guide a useful resource however if you have any further questions, please get in touch.

Personal Information in CareFree

Personal information is held in numerous screens within CareFree. The next sections of this guide will explain where to hold information for a candidate in recruitment, an employee, a client, a customer/contract, client/customer invoices and wages.

A consent form is recommended to gain permission for the company to store personal information which will inform why it is needed and who has access.

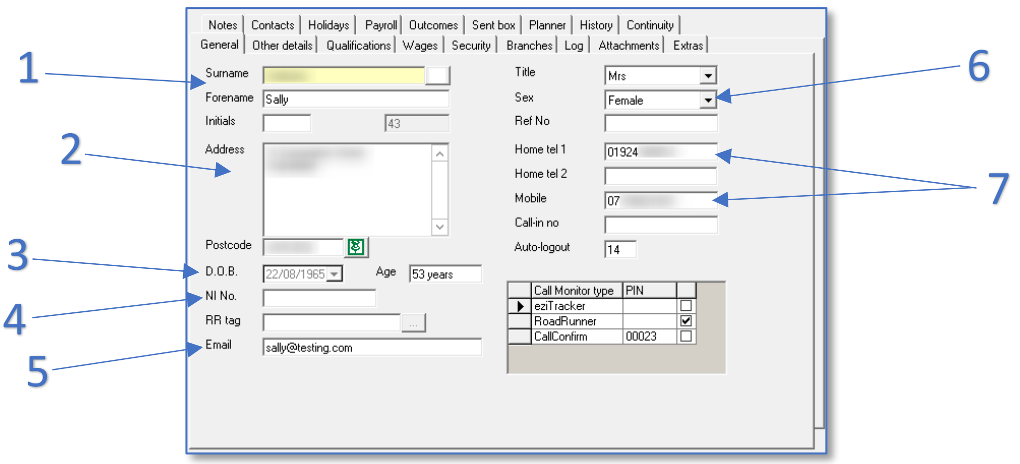
GDPR states that the individual has the right to be forgotten as well as updated. The following sections will demonstrate functionality within CareFree and how this can be achieved. In terms of how long to retain each part of information, you should refer to the ICO website links on page 4 for guidance.

Recruitment

CareFree has the ability to hold information about a candidate in recruitment. The next sections are recommendations of what we would expect a company to hold for recruitment purposes. This information in held in the Carer screen.

General Tab

The general tab will store most general information about the candidate.



1	The candidate's full name is stored is the **Surname** and **Forename** fields
2	The **Address** and **Postcode** is stored here
3	The **Date of Birth** is stored here
4	The **National Insurance Number** is stored here (if required)
5	The **Email Address** is stored here
6	The **Gender** is stored here
7	**Contact Numbers** are stored in these fields

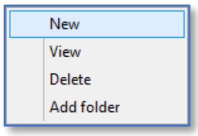
Attachments Tab

The attachments tab can be used to store any documentation for a candidate.

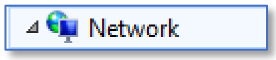
All application forms and interview notes are can be stored here for unsuccessful candidates in this tab.

In terms of how long to retain each part of information, you should refer to the ICO website links on page 4 for guidance but the following information demonstrates how to edit the information.

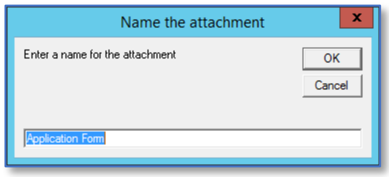
1. In the Carer screen, go to the **Attachments** tab
2. Click **Edit**
3. Right-click in the blank area on the attachments screen and click **New**



4. Use the file explorer to find the document to attach
    a. If CareFree is hosted use the **Network** section to search for the company shared drive or local PC



5. Once the document has been attached CareFree will ask for an attachment name



6. Click **OK** to save the attachments into the record

If an attachment is added from a shared drive this will allow other users access to the attachments. Please ensure that the other users trying to access the attachments have the shared drive mapped on their computer.

Removing Unsuccessful Candidates

Once the retention period has been reached, it is important to remove any personal information for any candidates who are unsuccessful with their application.

1. Open the **Carer** screen
2. Go to the candidate that requires deletion
3. Press **Delete** at the bottom of the screen

4. To confirm deletion, press **Yes**

The candidate will no longer be shown in any of the active, inactive, on hold or all lists.

All information entered in the general tab and the attachments tab will be removed from the CareFree system.

If the attachments were added from a shared drive the documents will need removing the shared drive as well

Employees and Client Information

Employee and Client personal information can also be stored in the Carer or Client screen. There are several areas where information can be stored within CareFree.

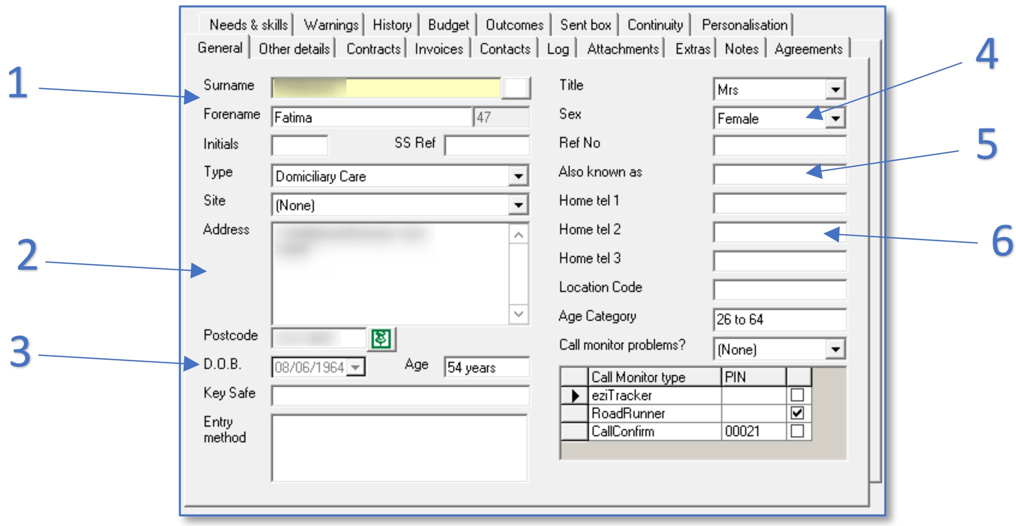
Client Screen

The Client screen can hold various information about a client receiving care.

A consent form is recommended to gain permission from the client for the company to store their personal information.

To go to the Client screen, click **Clients** at the top of the CareFree main screen.

General Tab



1	The name of the client is stored is the **Surname** and **Forename** fields
2	The **Address** and **Postcode** are stored here
3	The **Date of Birth** is stored here
4	The **Gender** is stored here
5	**Also Known As** can be used to store a nickname for the client
6	**Contact Numbers** are stored in these fields

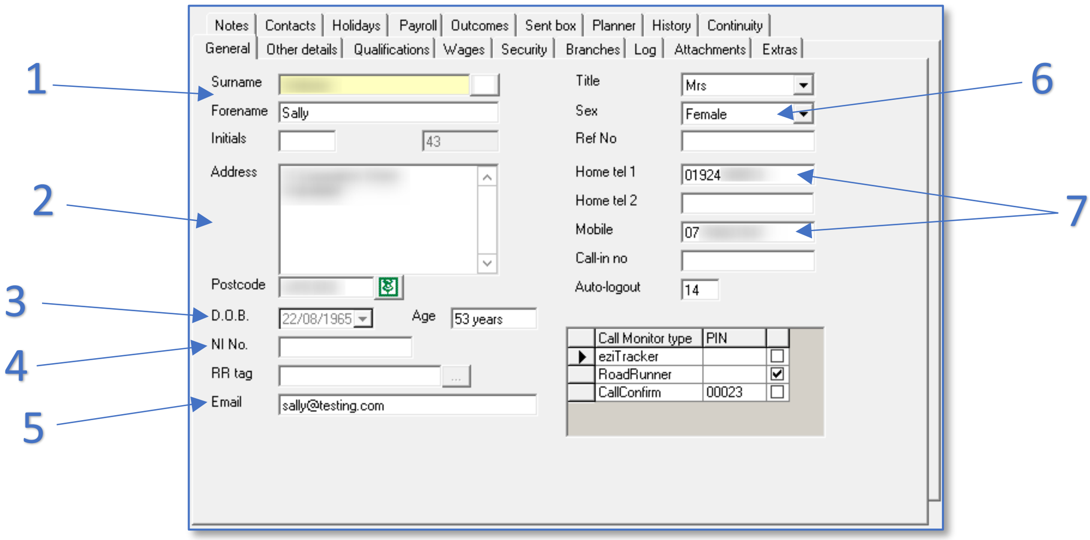
Carer Screen

The Carer screen can hold various information about themselves and their employment.

A consent form is recommended to gain permission from the carer for the company to store their personal information.

General Tab

The general tab will store most general information about the carer.



1	The Carers full name is stored is the **Surname** and **Forename** fields
2	The **Address** and **Postcode** is stored here
3	The **Date of Birth** is stored here
4	The **National Insurance Number** is stored here (if required)
5	The **Email Address** is stored here
6	The **Gender** is stored here
7	**Contact Numbers** are stored in these fields

Attachments Tab

As well as the documentation for candidates in the recruitment stage we would also expect a company to hold additional documentation for employees:

- *Pension Scheme Investment Policies*
- *Personnel Files and Training Records (including disciplinary records and working time records)*
- *Redundancy Details, Calculations of Payments, Refunds, Notification to The Secretary of State*
- *Senior Executives' Records (that is, those on a senior management team or their equivalents)*
- *Time Cards*
- *Trade Union Agreements*
- *Records Relating to Children and Young Adults*
- *Retirement Benefits Schemes – Records of Notifiable Events, For Example, Relating to Incapacity*
- *Working Time Records*
- *Statutory Maternity Pay Records, Calculations, Certificates (Mat B1s) or Other Medical Evidence*
- *National Minimum Wage Records*

In terms of how long to retain each part of information, you should refer to the ICO website links on page 4 for guidance but the following information demonstrates how to edit the information.

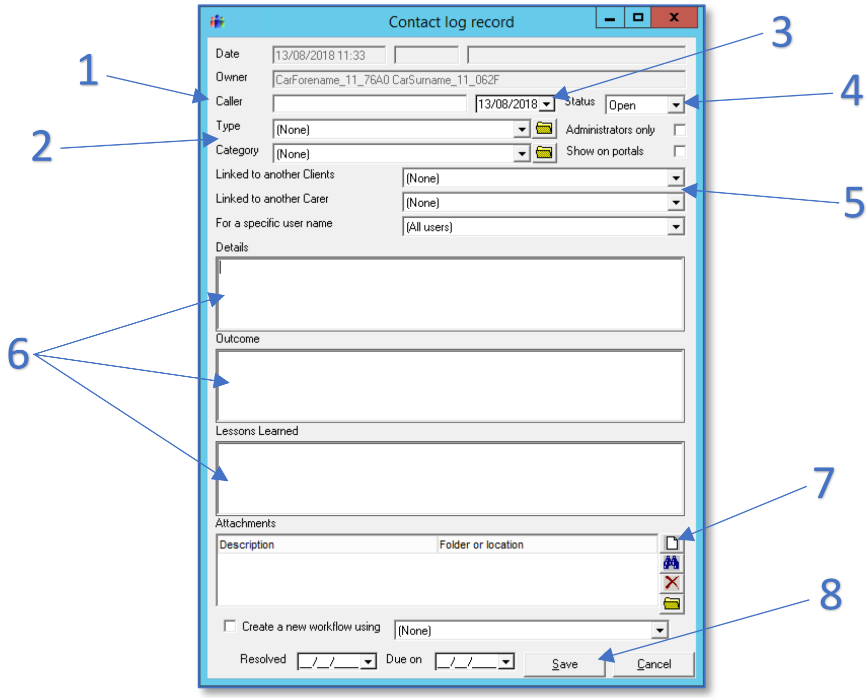
1. In the Carer / Client screen, go to the **Attachments** tab
2. Click **Edit**
3. Right-click in the blank area on the attachments screen and click **New**
4. Use the file explorer to find the document to attach
   If CareFree is hosted use the ***Network*** *section to search for the company shared drive or local PC*
5. Once the document has been attached CareFree will ask for an attachment name
6. Click **OK** to save the attachments into the record

If an attachment is added from a shared drive this will allow other users access to the attachments. Please ensure that the other users trying to access the attachments have the shared drive mapped on their computer.

Logs Tab

Contact logs can be used as an audit trail for conversations/incidents. It is important to record any important conversations or incidents between a member of staff, a customer, a client etc. In terms of how long to retain each part of information, you should refer to the ICO website links on page 4 for guidance but the following information demonstrates how to edit the information.

1. Open the Carer / Client screen and click **Edit**
2. Right-click the blank area in the Log screen and click **New**

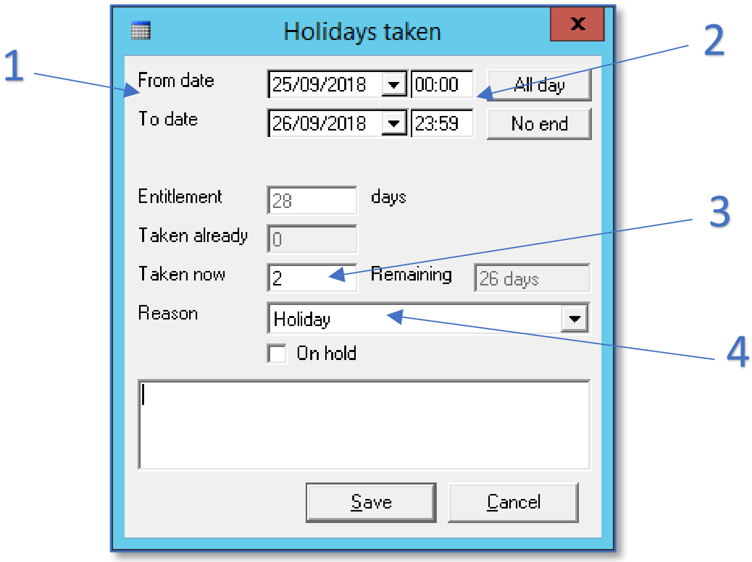


1	Fill in the **Caller** of the log
2	Select the correct log **Type** and **Category** from the drop-down lists – this will help find the log in future searches
3	An **Alternative Date** can be specified if a message is taken when a user does not have access to CareFree
4	Choose the **Status** of the log i.e. open or closed
5	Selecting a **Client** and/or **Carer** name in these drop-down boxes will show the log in their records
6	Use these fields to enter **Details**, an **Outcome** and **Lessons Learned**
7	**Attachments** can be added to the log here. Click the paper icon to add an attachment to the log
8	Click **Save** to save the log to CareFree

Away Periods / Planner

Away periods are entered on the CareFree rota. They can then be viewed on a yearly planner in the Planner tab in Carer's record. This is a good tool to support absence monitoring, annual leave and parental leave requests. In terms of how long to retain each part of information, you should refer to the ICO website links on page 4 for guidance but the following information demonstrates how to edit the information.

1. Open the **Rota** and the Carer or Client rota view
2. Open the **Away Periods** tab at the bottom of the rota
3. Click the  button at the top-right of the screen



1	Select the date range of the away period using the **From Date** and **To Date** options
2	Select the **Start Time** and **End Time** that the Carer / Client is away
3	If the away period is annual leave, enter how many days annual leave they are using in the **Taken Now** field
4	Use the **Reason** drop-down box to enter why they are away

Wages / Invoices Tab

When finalising wages for employee's the individual wage sheets are stored in the wages tab in the Carer's screen. It is important for a company to keep information such as:

- Wage/salary records (also overtime, bonuses, expenses)
- Income tax and NI returns, income tax records and correspondence with HMRC

Depending on how the company uses CareFree, some of the above may be stored in the Attachments tab of the Carer's record.

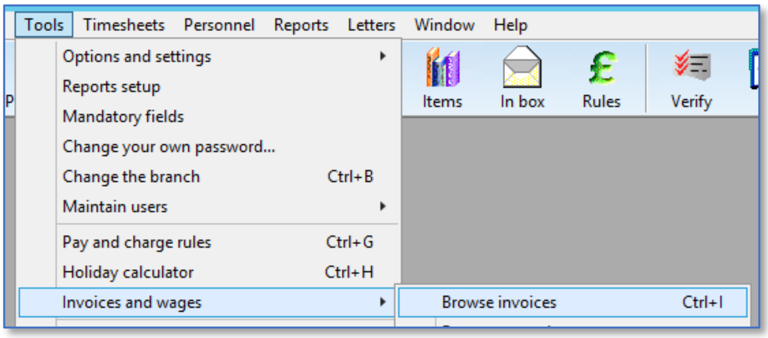
You should refer to the ICO website links on page 4 for guidance but the following information demonstrates how to edit the information.

Invoices and Wage Sheets are stored in CareFree when they are finalised. Once finalised the invoice/wage sheet is stored in numerous screens. It is important to understand where the invoices/wage sheets are stored and how to remove them from CareFree after the recommended retention period has been reached.

Invoices

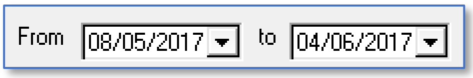
Invoices are stored in the **Invoices** tab. Depending on who is paying for the invoice it will appear in:

- Client records
- Contracts
- Customers



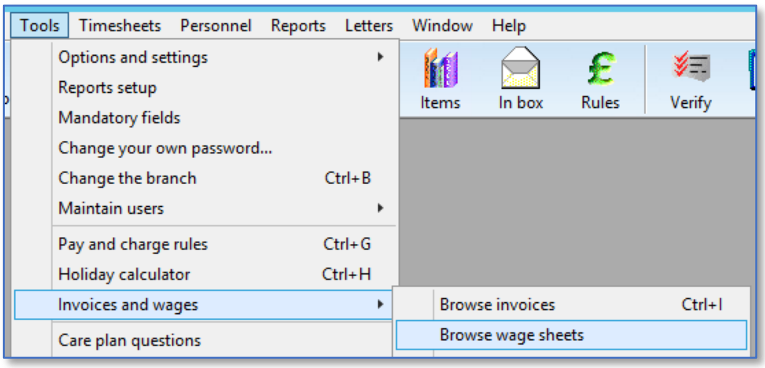
All Invoices will appear in the Browse Invoices screen:

1. Go to **Tools**
2. Go to **Invoices and Wages**
3. Click **Browse Invoices**
4. Use the date ranges at the top of the screen to find the correct invoice

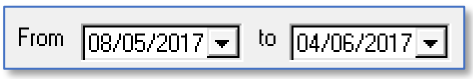


Wage Sheets

Wages are stored in the **Wages** tab in the Carer's record. However, all wages will appear in the Browse Wage Sheets screen:



1. Go to **Tools**
2. Go to **Invoices and Wages**
3. Click **Browse Wage Sheets**
4. Use the date ranges at the top of the screen to find the correct wage sheet

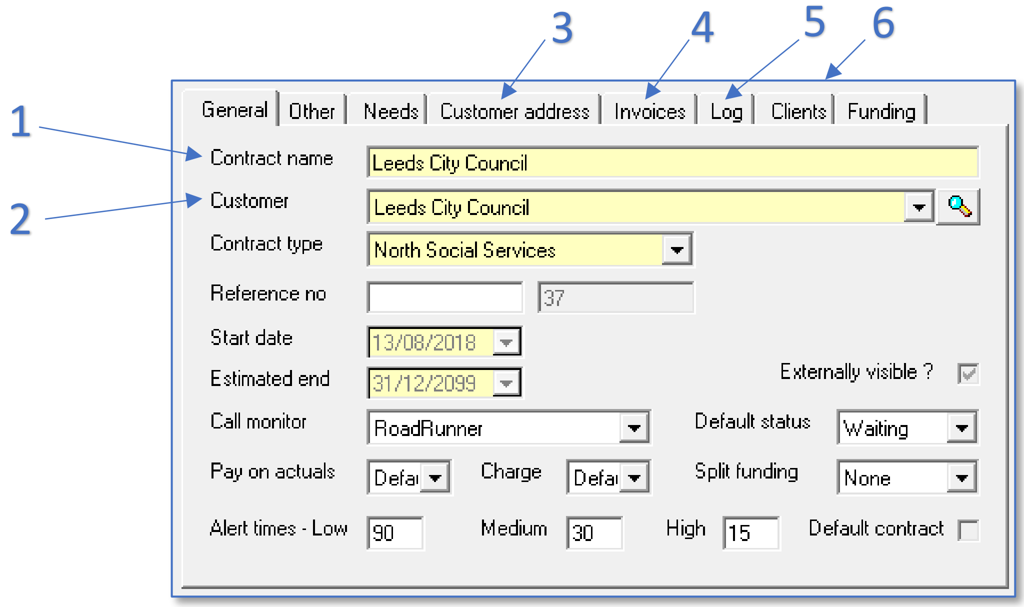


Contracts Tab

A contract is the agreement(s) in place for who is paying for the Client's care. This information is stored in the Contracts tab in the Client's record.

The contract may be a private contract where the Client's personal information will be stored or it may be a social services/council contract which may cover multiple Client's care at the company.

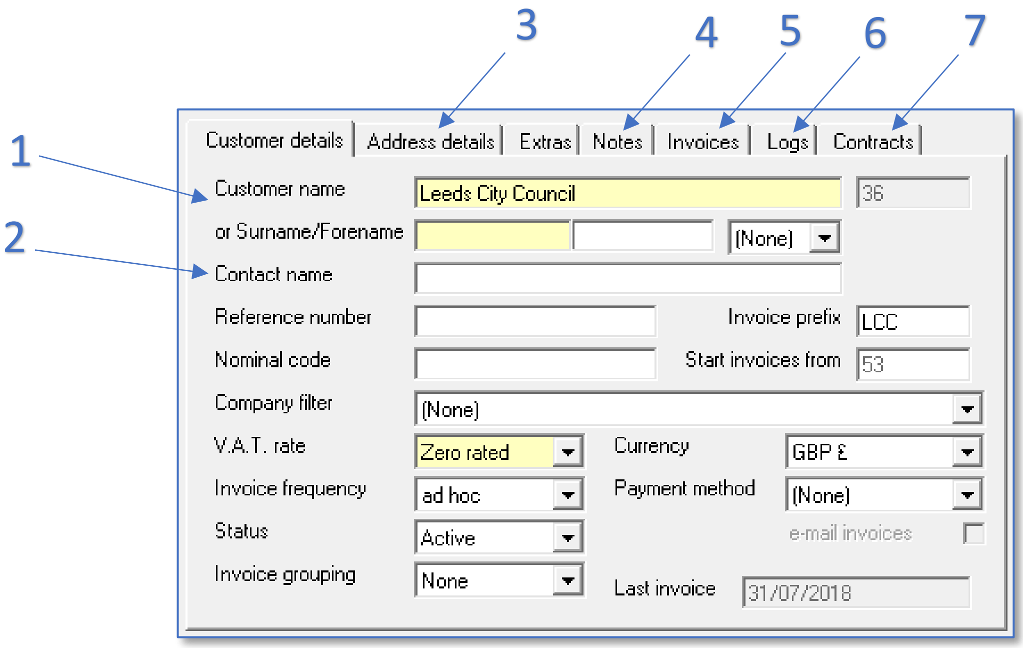
CareFree has the ability to hold information about a contract. The information listed below are all recommendations of what we would expect a company to hold for billing purposes. This information in held in the Contracts screen.



1	The **Contract Name** is stored here, if this is a private contract it would usually be the name of the client/customer
2	The **Customer** is stored here (person paying the bill)
3	The **Customer Address** is stored in this tab – contact numbers and email are also stored in this tab
4	Finalised **Invoices** for the contract are stored in this tab
5	**Logs** for the contract are stored here
6	The **Clients** that use this contract are stored here

Customers

A customer must be linked to a contract, whether this contract be private, social services, direct payments etc. Sometimes the customer will be an individual and sometimes an organisation. In the contracts screen, click the magnifying glass next to the customer field.



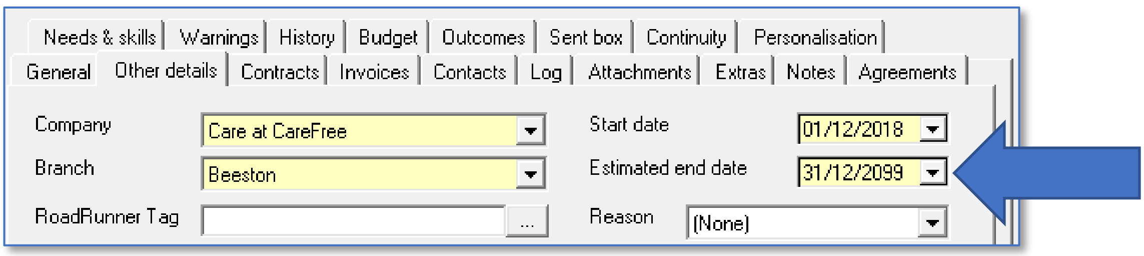
1	The **Customer Name** is stored here. The customer name field would be if the customer was an organisation, for an individual fill in the Surname/Forename fields
2	The **Contact Name** is stored here – if the customer is an organisation an individual contact can be stored here
3	The **Customer Address** is stored in this tab – contact numbers and email are also stored in this tab
4	**Notes** are stored here
5	Finalised **Invoices** for the contract are stored in this tab
6	**Logs** for the contract are stored here
7	The **Contracts** that use this customer are stored here

Removing an Employee/Client

Due to CareFree collating various elements of personal information in different screens, the method for removing an employee or client should be followed in versions V5.5 or below. This is to ensure that the rotas, invoices, calls, logs, audit trails etc are not compromised.

Instead, it is recommended that the records are made inactive. It is still important to ensure all relevant personal information is held for the recommended retention period and all irrelevant personal information is removed.

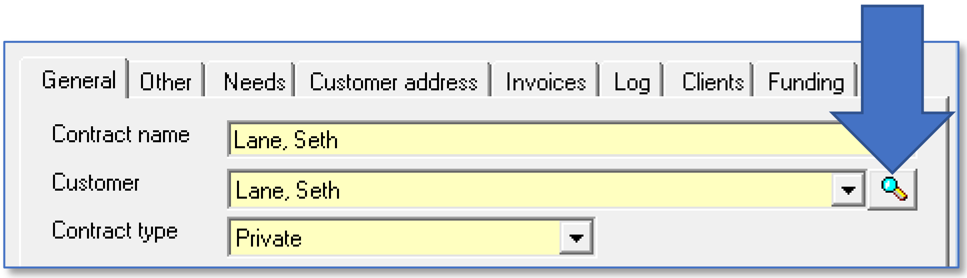
1. Open the Carer/Client screen and open the appropriate record
2. Open the **Other Details** tab
3. Click **Edit**
4. Change the **Estimated End Date** to the date the Carer is leaving the company or the date the Client is no longer receiving care



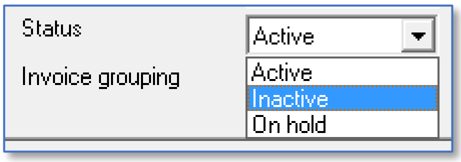
5. Click **OK** to make the record inactive

De-activating a Customer

1. In the **Contracts** screen, go to the appropriate contract
2. Click the magnifying glass next the **Customer field**



3. Click **Edit**
4. Change the Status drop-down box to **Inactive**



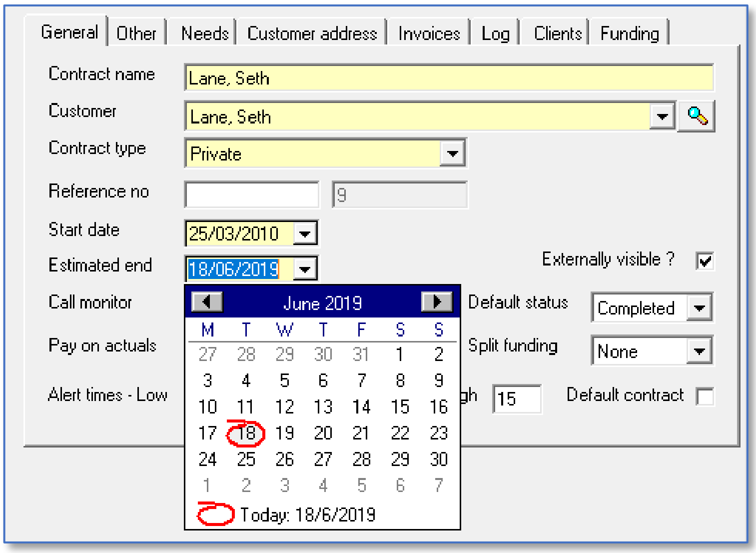
Click **OK** for the customer to be moved into the inactive tab. Before doing so, we recommend that additional information is changed/removed from the customer while making them inactive:

- Customer Name **<u>or</u>** Surname/Forename
- Address and Postcode
- Email
- Contact Numbers
- Invoices – see page 21 on how to unfinalise invoices

As the Customer name/surname field is mandatory for a customer it is recommended that a reference number is stored in this field i.e. CareFree database reference number

De-activating a Contract

1. In the **Contracts** screen, go to the appropriate contract
2. Click **Edit**
3. Change the **Estimated End Date** to the date the contract is finishing



Click **OK** for the contract to be moved into the inactive tab. Before doing so, we recommend that the Contract Name is removed from the contract while making them inactive.

As the Customer name/surname field is mandatory for a customer it is recommended that a reference number is stored in this field i.e. CareFree database reference number

Other Areas to Consider

After the recommended retention period(s) companies should remove all information from CareFree from numerous tabs in a record. The areas you may need to review are as follows:

General Tab

Once the retention period is met, remove all personal information from the following fields:

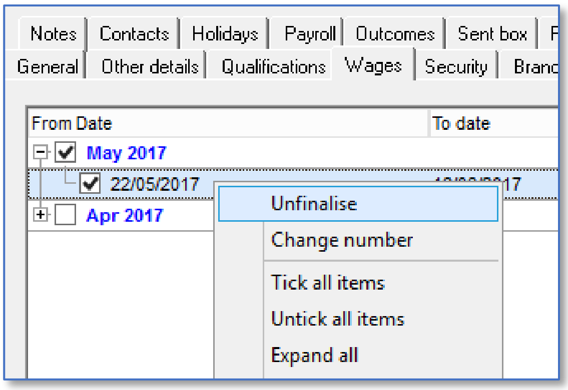
- Surname and Forename
- Address and Postcode
- National Insurance Number
- Email
- Gender
- Contact Numbers
- Also Known As

If any fields are mandatory in CareFree it is recommended that a reference number for the record is stored in this field i.e. payroll number, database ID

Unfinalising Invoices/Wage Sheets

Invoices and Wage Sheets can be unfinalised either from the Clients/Carers Invoices/Wages tab or through the Browse Invoices/Browse Wage Sheets screen.

1. Tick the Invoices/Wage Sheets that require unfinalising
2. Right-click
3. Click **Unfinalise**
4. Click **Yes** to confirm the action

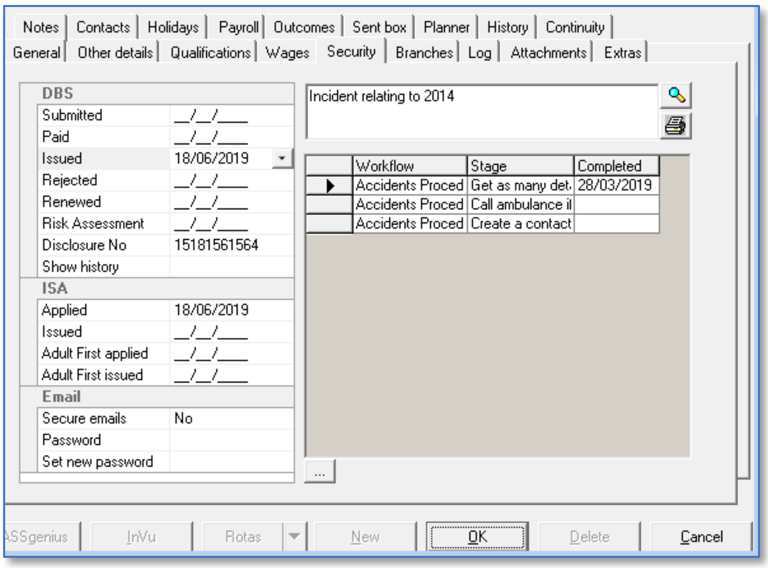


Security Tab (for Carers)

Remove all personal information past recommended retention including:

- DBS disclosure numbers along with any notes
- ISA information along with any notes
- Workflows along with any notes

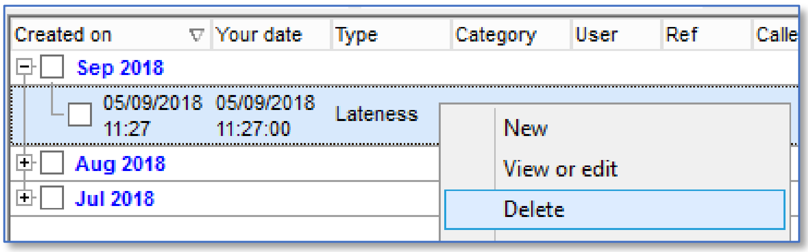
1. Open the **Carer** screen
2. Go to the **Security** Tab
3. Click **Edit**
4. Delete all personal information
5. Click **OK**



Log Tab

All logs relating to the Carer/Client may need reviewing. Some logs may need to be kept until a recommended retention period, please see the link on page 4 for guidance.

1. Go the Carer/Client/Customer/Contract screen then go to the **Log** tab
2. Right-click the log and click **Delete** to delete the log from CareFree



Attachments Tab

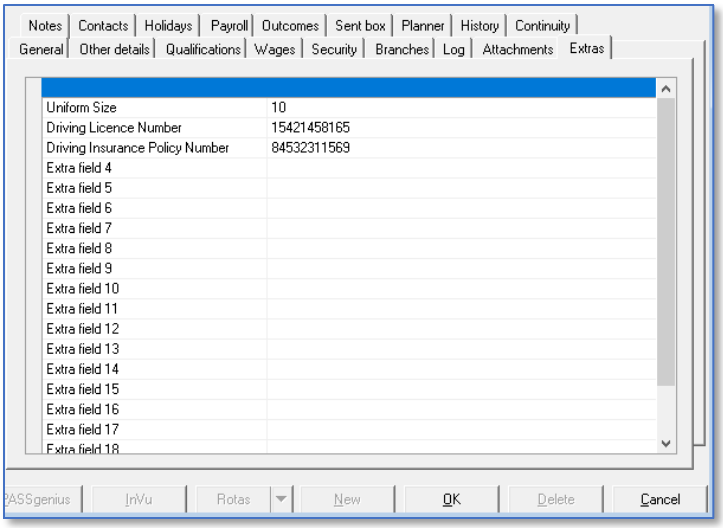
Any attachments relating to the Carer can be reviewed for deletion.

1. In the Carer screen, go to the **Attachments** tab
2. Click **Edit**
3. Right-click the attachment that requires deletion
4. Click **OK**

Extras

In this tab, remove all personal information from these fields.

1. Open the **Carer** screen
2. Go to the **Extras** Tab
3. Click **Edit**
4. Delete all personal information
5. Click **OK**

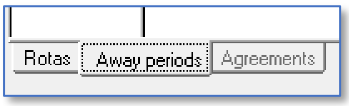


Planner (for Carers)

The planner screen will display selected away periods for a Carer. Some away periods may need to be kept until a recommended retention period for example parental leave. Please see the links on page 4 for more information.

At the end of the retention period it is important to remove the necessary away periods from CareFree.

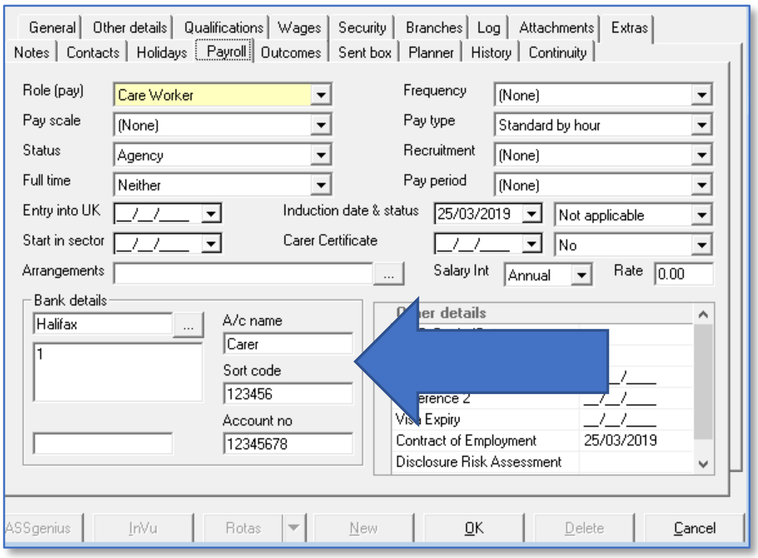
1. Go to the **Rota**
2. Ensure the Carer's rota is displayed
3. Go to the **Away Periods** tab at the bottom of the rota



4. Use the month selection to the left to quickly search through previous years of away periods, select the away period that required deletion
5. Once the correct away period is selected, click the  button
6. Click **Yes** to confirm deletion of the away periods

Payroll (for Carers)

You should remove any bank details that may be stored in this tab.



1. Open the **Carer** screen
2. Go to the **Payroll** Tab
3. Click **Edit**
4. Delete all banking information from the Bank Details section
5. Click **OK**

Contacts

The contact will need deleting from the contacts screen also, unless the contact is recorded on another Carer record i.e. a doctor.

1. Open the Carer screen
2. Go to the appropriate Carer
3. Go to the **Contacts** tab
4. Click **Edit**
5. Right-click the contact and press **Delete**
6. Click **OK** to save

If the contact needs removing from the contacts screen:

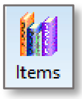
1. Go to **View**
2. Click **Contacts**
3. Using the drop-down box at the top left-hand side of the screen go to the category that the contact falls under
4. Select the appropriate contact and click **Delete**
5. Click **Yes** to confirm deletion

User Security

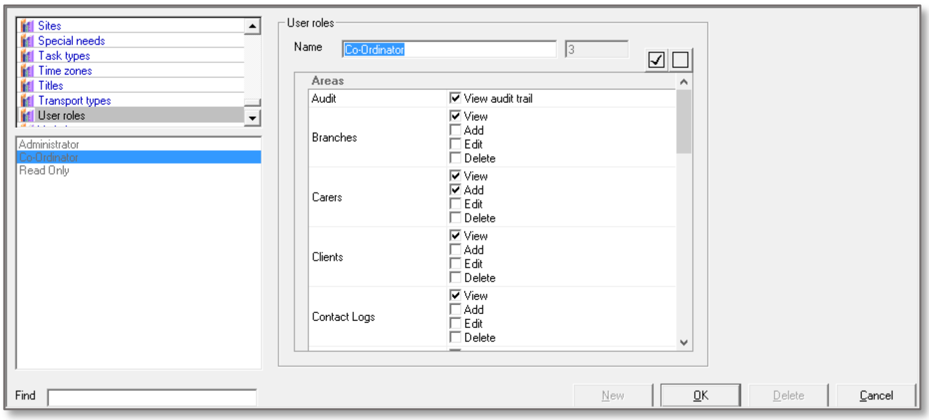
It is important that all users that need to access CareFree have their own user account. The CareFree audit trail will keep track of all user actions therefore making the audit trail a reliable tool when investigating if all staff are logging in with their own user account.

User Roles

Administrators are able to personalise what access each user has and which branch they work with. This will limit what data can be seen by each user. User roles are created/amended via the **Items** screen choosing the functionality each user role has access to.

1. Go to the **Items** screen 

2. Go to **User Roles**
3. Click **New** to create a new user role or to amend an existing user role, select the user role and click **Edit**

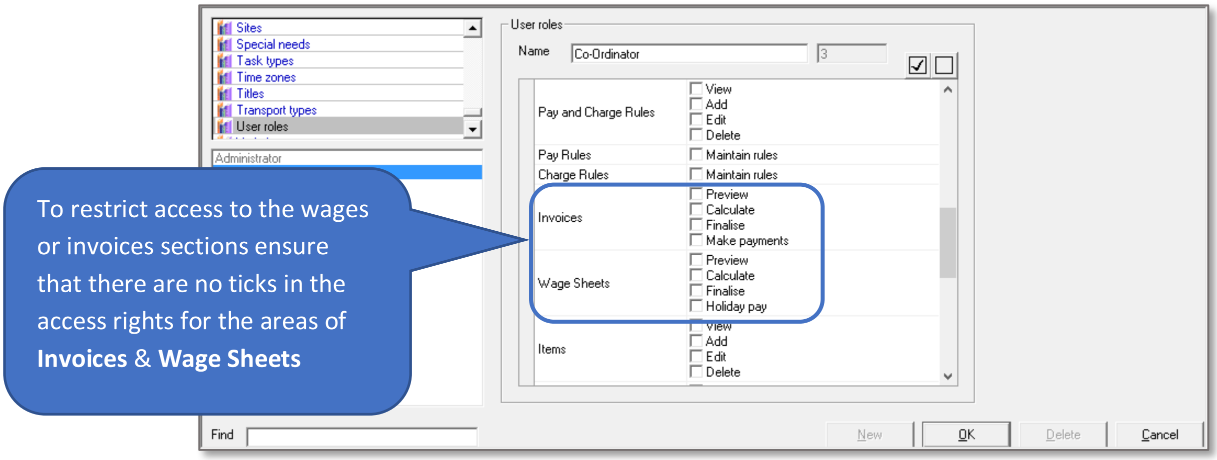


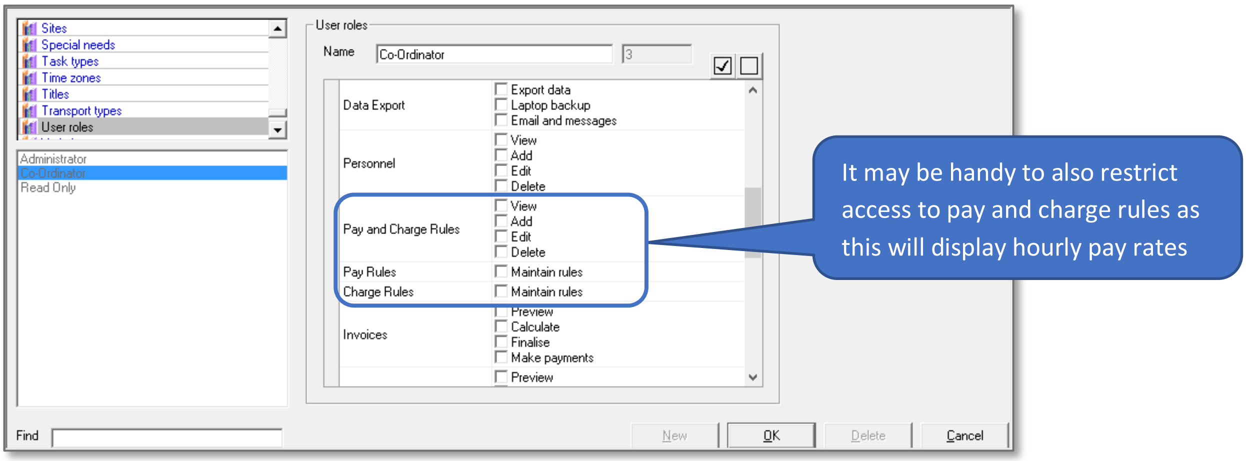
4. A list of system areas will be displayed. The tick boxes within these areas will allow permission where ticked and deny when unticked e.g. under the Carers area if the **Add** tick box is ticked the user will be able to add new carers to CareFree. If the **Delete** tick box is unticked the delete button will be greyed out

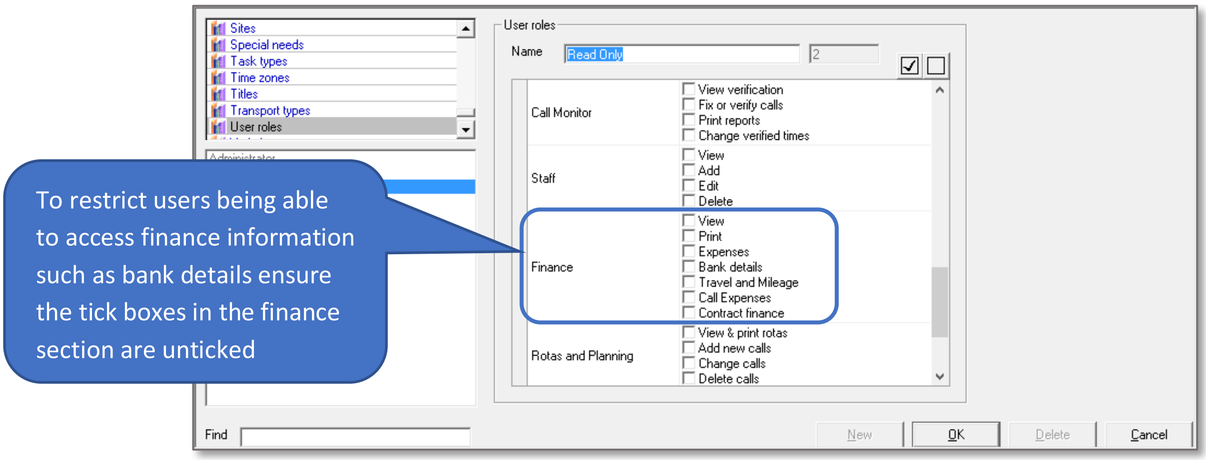
Once the roles and role restrictions/access criteria have been set users can be created and assign to the appropriate user role.

Financial Information User Access

It is common for system administrators and managers to want to restrict access to financially sensitive information. This is easily achieved by denying access to certain functional areas for specific user roles.

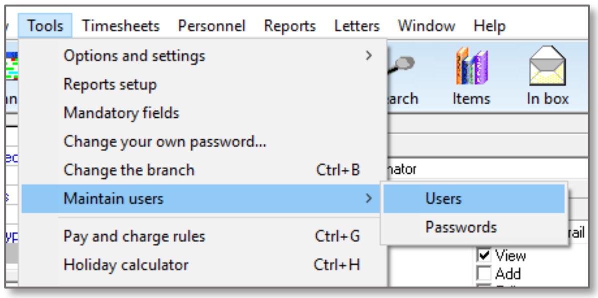




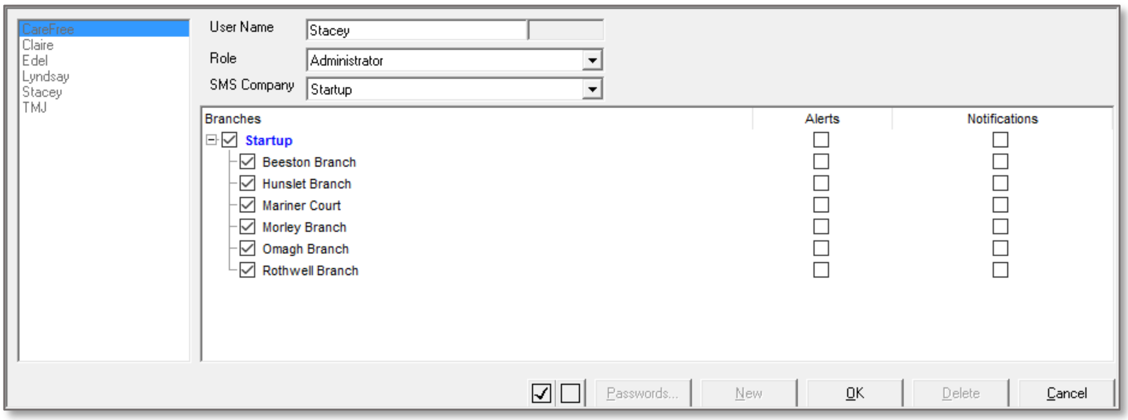


Adding Users

1. Go to the **Tools** menu at the top of the screen



2. Go to **Maintain Users**
3. Click **Users**
4. When the user screen appears, click **New** to create a new user

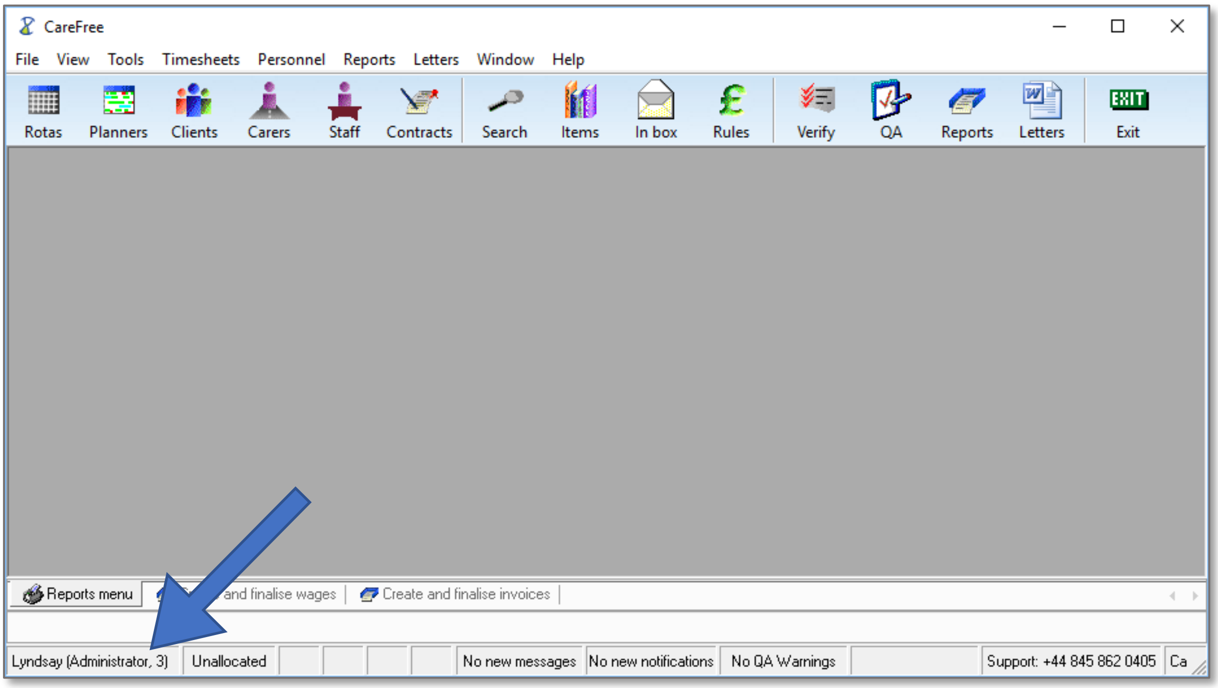


5. Type in the name of the required new user in the **User Name** field
6. Select an appropriate role for the new user
7. Select the companies and branches this new user will have access to
8. Select whether the new user will need to receive alerts and/or notifications for certain companies and branches
9. Click **OK** and to save the new user

Logging in as a Different User

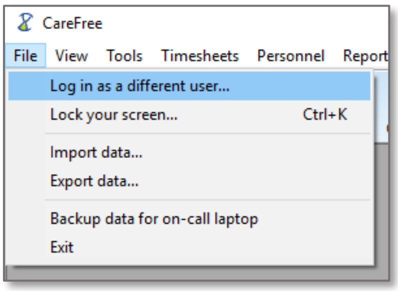
It is essential that you are always logged into CareFree with your own user account.

A quick way to see who is logged into CareFree is by looking to the bottom left hand part of the screen which will show the name of the user who is logged in and what their user role is.

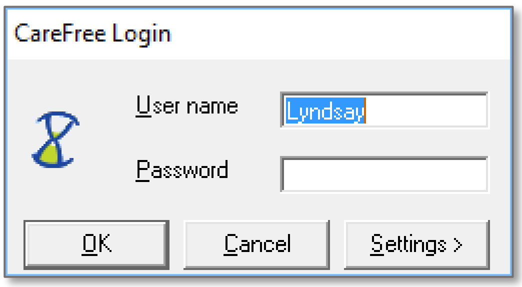


If the user who is logged in is not your user account you must switch users.

1. Go to the **File** menu at the top of the screen
2. Click **Log in as a different user…**



3. Enter in your own **User name** along with your **Password**
4. Click **OK**



Password Security

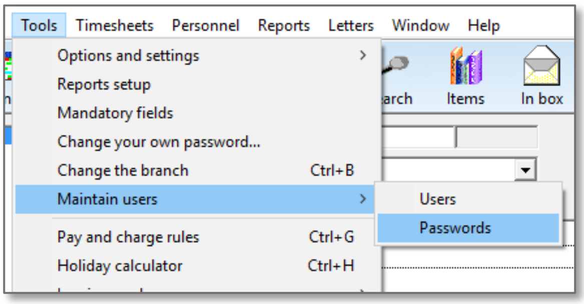
It is important to ensure all users keep their password secure and ensure all users have a password that only they know. The CareFree audit trail will keep track of all user actions therefore making the audit trail a reliable tool when investigating if all passwords are kept secure.

Resetting and Changing Passwords

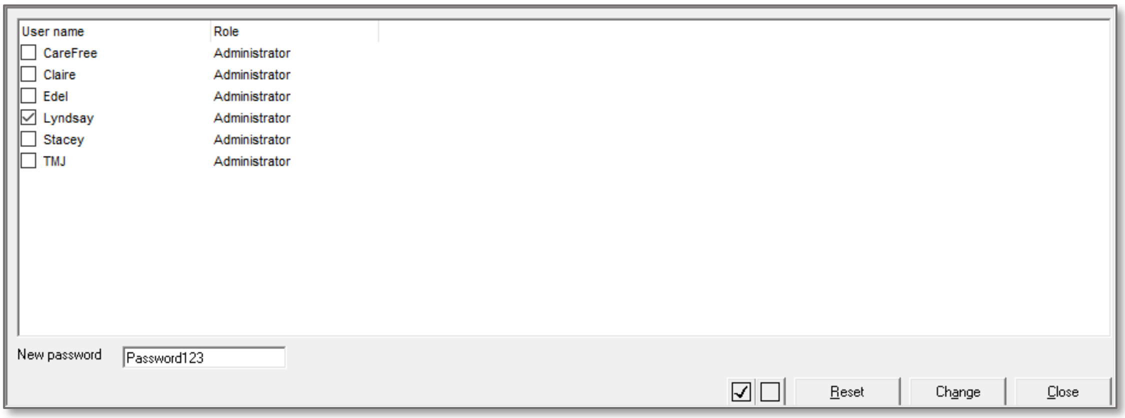
By default, the password for a new user is set up as being the same as their user name.

This can be altered using the passwords screen. To access this screen:

1. Go to the **Tools** menu at the top of the screen
2. Go to **Maintain Users**
3. Click **Passwords**



4. The passwords screen will then appear



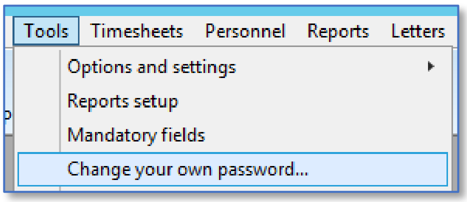
5. Select the user whose password you wish to change
6. Type new password in the **New Password** field
7. Click **Change** to change the user's password
8. By clicking **Reset** this will change the user's password to the default setting (their username)

Changing Your Own Password

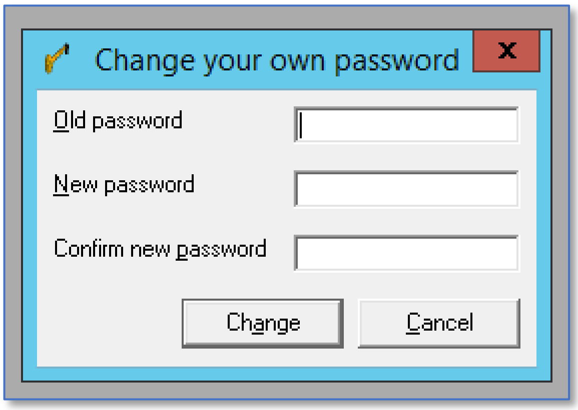
Users have the ability to change their own password if required to do so.

If CareFree does not ask for passwords to be changed on a regular basis our recommended is for users to change their own password every 30 days or when they feel it is necessary to do so. This ensures that staff are accessing CareFree under their own user account and not logging in as somebody else.

1. Go to **Tools**
2. Click **Change your own password…**



3. Users must enter their **Old Password** to begin with

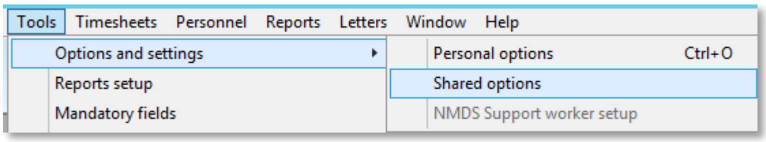


4. Users must then enter a **New Password** and confirm the new password
5. Click **Change** once completed

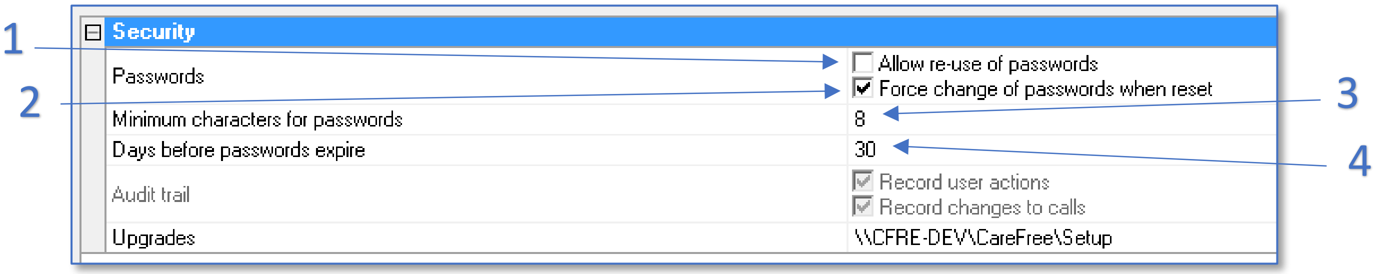
Password Security – Shared Options

A setting for all users can be set within the shared options of CareFree to ensure passwords are reset after a certain amount of days and a minimum amount of characters are used on every password.

Our recommendations for these settings are below.



1. Go to the **Tools** menu at the top of the screen
2. Go to **Options and Settings**
3. Click **Shared Options**
4. When the shared options screen appears, click **Security** listed down the left of the screen



1	**'Allow re-use of password'** will determine whether users can use a previously used password to access CareFree *Our recommendation is that this option is switched OFF*
2	**'Force change of passwords when reset'** will force the user to change their password when it has been reset *Our recommendation is that this option is switched ON*
3	**'Minimum character for passwords'** will determine the number of characters that must be used for a password *Our recommendation is that this option is set to 8*
4	**'Days before passwords expire'** will determine the number of days before a password will need to be changed *Our recommendation is that this option is set to 30*

Glossary

Additional Training Guides

Day 1 Training Guide – This guide will explain the basics of CareFree and is recommended to be read by users who are new to CareFree.

Day 2 Training Guide – This guide will explain the advanced features of CareFree. It is based on the user having basic knowledge of CareFree.

Day 3 Training Guide – This guide will explain how to set up the financials in CareFree. The guide ranges from setting up charge rates for clients and pay rates for Carers. The guide will also explain how to run invoices and wages. It is based on the user having basic knowledge of CareFree.

CareFree Knowledge Base – The knowledge base, also known as the DokuWiki, is updated regularly by the CareFree training team and is useful to refer to as quick training guide