

# Fair Processing Notice –Bailiwick Social Prescribing

Health & Social Care (HSC) and the Health Improvement Commission LBG (HIC) have formed a partnership ('the partnership') in order to enable the delivery of the 'Bailiwick Social Prescribing' service ('the service') within the Bailiwick of Guernsey. The Bailiwick Social Prescribing Steering Group oversees the activities of the service and is the controller in respect of the Data Protection (Bailiwick of Guernsey) Law, 2017 ('the Law').

The service encompasses other key partners including GPs, medical specialists, community and voluntary organisations and other health and care organisations all with the joint objective of improving the health and wellbeing of Bailiwick residents. This notice aims to fully explain the processing activities of the service; it includes a full list of relevant organisations that are involved, it explains the role of each organisation and all of the associated processing activities that are undertaken. This notice also explains how the processing complies with the requirements of the Data Protection (Bailiwick of Guernsey) Law, 2017 ('the Law'). It should be noted that the service is currently operating as a pilot scheme until **September 2022** where a decision will then be made in relation to the future of Bailiwick Social Prescribing.

## 1. The Data Protection Law

The controller acknowledges its obligations of the Law, which includes a number of requirements for organisations that are seeking to process the personal data of Bailiwick residents. The controller further acknowledges the general principles and more information in relation to these provisions are provided within this notice. Information about the rights of a data subject can be found by visiting [www.gov.gg/dp](http://www.gov.gg/dp).

## 2. The Principles of Processing

### a. Lawfulness, fairness and transparency

*Personal data must be processed lawfully, fairly and in a transparent manner.*

In order to comply with this principle of processing, it is important to fully explain the purpose of the service and how it operates in practice before further information is provided in relation to what personal data is collected and processed.

What is Bailiwick Social Prescribing?

In December 2017, the States of Deliberation agreed to the ‘Partnership of Purpose’ which set the overall direction for the future of health and care provision within the Bailiwick of Guernsey. This ultimately led to the establishment of Bailiwick Social Prescribing. The purpose of the service is to ensure that consideration is given to a broader set of determinants when assessing the health and wellbeing of individuals and society as a whole. Essentially, social prescribing means supporting individuals by providing a referral system which includes a much wider range of local agencies, not just medical organisations, in order to improve the health and wellbeing of all islanders. These agencies include: general practices, local authorities, pharmacies, multi-disciplinary teams, hospital discharge teams, allied health professionals, the fire service, law enforcement, job centers, social care services, housing associations and voluntary, community and social enterprise organisations.

How does this work in practice?

Members of the public can either self-refer to the service or they may be referred by other agencies (such as by their general practitioner or other agency). A “Link Worker” of the service will meet with the individual in order to discuss their needs. Using this information, the Link Worker will suggest onward referral and/or signposting to the agencies that are deemed appropriate in order to support that individual in relation to their health and wellbeing.

What personal data is collected, what happens to it and why?

<u>Personal Data</u>	<u>Purpose of processing</u>	<u>Data sharing</u>	<u>Lawful basis for processing</u>
<u>Basic</u> Name, telephone number, date of birth, email, gender, address and any other information provided by the data subject which	To assess requirements of individuals so that they may be referred to appropriate local agencies (see “Data Sharing” column) in order to improve their	Personal data may be shared with any organisations or agencies listed here [www.bsp.org.gg]	<u>Schedule 2, Part III Condition 18:</u>  The data subject has given explicit consent to the processing of

<p>may be relevant such as employment status, living arrangements etc.</p> <p><u>Special Category Data</u></p> <p>Health data.</p>	<p>general health and wellbeing. Once referred, personal data may then be shared to monitor and provide feedback in terms of the ongoing support.</p>		<p>the personal data for the purpose for which it is processed.</p>
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**b. Purpose limitation**

*Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.*

Personal data collected by the service will only be processed in accordance with section 2a of this fair processing notice. As the lawful basis for processing is reliant on the consent of the data subject, no personal data will be shared with any agency without the agreement of the data subject in question.

**c. Minimisation**

*Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.*

The processing of personal data will be limited to that which is detailed within the table located in section 2a of this notice. No further personal data will be processed unless required by law.

**d. Accuracy**

*Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.*

The controller will ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

**e. Storage limitation**

*Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.*

Personal data is stored by Health Improvement Commission and will not be retained for longer than is absolutely necessary in relation to the purpose for which it is processed. Personal data is stored in accordance with the Bailiwick Social Prescribing Retention & Disposal Schedule.

**f. Integrity and confidentiality**

*Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.*

Personal data is stored by Health Improvement Commission which uses a database offered by Lamplight Database Systems. For more information about the data protection and security arrangements linked to Lamplight Database Systems, please visit <http://www.lamplightdb.co.uk/gdpr-faqs/>.

**g. Accountability**

*The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.*

### 3. Contact Details

The contact details of the controllers are as follows:

Bailiwick Social Prescribing Steering Group

Address: Health Improvement Commission LBG, KGV Playing Fields, Rue Cohu, Castel, Guernsey, GY5 7SZ

Email: [simon.sebire@healthimprovement.gg](mailto:simon.sebire@healthimprovement.gg)

The contact details for the Data Protection Officer of the Bailiwick Social Prescribing service are as follows:

Data Protection Officer

Tel: 01481 717000

Email: [data.protection@gov.gg](mailto:data.protection@gov.gg)