

Adult Social Care and Health (ASCH) Directorate

Business Delivery Unit: Information Governance

Privacy Notice Internal Approval Procedure

Document details

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Version control (record of summary changes to document)

Date	Changed by	Section	Summary of change
November 2021	Lauren Liddell-Young	Whole document	First published privacy notice internal approval process
October 2022	Lauren Liddell-Young	Process and Nominated Individuals	Updated process flow chart to reflect responsibility and updated nominated individuals list.

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Introduction

Under UK GDPR organisations are required to tell individuals when they collect personal data from them. This is made available in a privacy notice which is circulated to individuals.

This document is the procedure for ASCH staff to follow for the privacy notice internal approval. Internal approval refers to the ASCH Information Governance Lead approving the privacy notice and or any changes, updates, or amendments prior to them being made publicly available by Digital Services.

Scope

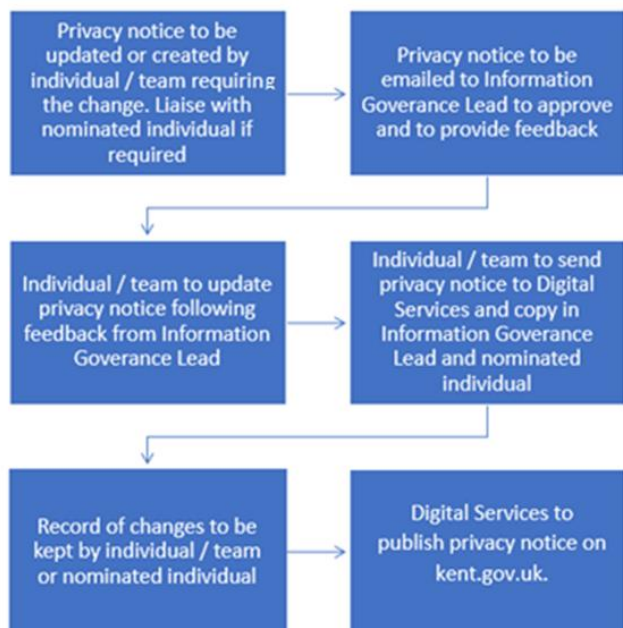
This document is only applicable to ASCH staff who require to update, amend, or change or create an ASCH privacy notice.

Process

The privacy notice approval process is listed below. Please note:

- It is the responsibility of the nominated individual to ensure their privacy notices are kept up-to-date and met GDPR standards.
- The Information Governance Lead will, where applicable, share corporate guidance on privacy notices and make recommendations to responsible leads.
- A privacy notice is a live document and should be frequently reviewed for the duration of the processing activity. Any updates or changes need to be submitted to the Information Governance Lead to approve prior to being published.

Diagram 1 – Privacy Notice Process for ASCH Staff who require to update, amend, or change or create an ASCH privacy notice.



If you wish to update or amend a privacy notice available on kent.gov.uk please contact lauren.liddell-young@kent.gov.uk to discuss further.

Frequently Asked Questions

- 1) Where can I find an up-to-date copy of ASCH's privacy notices?
 - All privacy notices are made available on kent.gov.uk.
- 2) How can I update, change or amend a privacy notice?
 - Copy and paste the required privacy notice on kent.gov.uk into a Word document to edit.
- 3) What is the preferred method of letting Digital Services know of any updates, changes or amendments?
 - After you have copied and pasted the required privacy notice on kent.gov.uk into a Word document to edit, use track changes or highlight information that needs to be edited, added or deleted. Email Digital Services on digital.services@kent.gov.uk with the attached document and copy in the Information Governance Lead.
- 4) How do I check for PDF accessibility?
 - You can check accessibility of the PDF by using the 'accessibility checker' in Word before you publish to PDF. Or contact our Digital Accessibility Champion or email digitalaccessibility@kent.gov.uk who can check/fix your document to make it compliant. Digital Services may ask you to confirm compliance prior to the PDF being made live on kent.gov.uk.
- 5) What role does the Information Governance Lead have in this process?
 - The Information Governance Lead is responsible for approving privacy notices prior to these being made publicly available by Digital Services. This may include providing feedback and recommendations for privacy notices.
 - The Information Governance Lead is also the page owner for kent.gov.uk and Digital Services may ask her for her approval, prior to making a privacy notice (or updates, changes or amendments) live.
- 6) Can I use the Corporate Privacy Notice to cover my processing of data?
 - No, KCC Privacy Notice Guidance states that although KCC has a corporate privacy notice, it is expected that each service unit should produce their own privacy notices. Also, as each service unit will have different reasons for processing, a bespoke privacy notice is required.
- 7) Can I use the general notice to cover ASCH to cover my processing of data?
 - This privacy notice is designed to give an overview of what types of personal and special category data can be processed by each individual service unit of ASCH, and the reason(s) (purposes) why. This privacy notice can only be used when the

majority of social care clients (or their support network) that ASCH support would be affected. If in any doubt on whether you can use the general notice to cover ASCH, please contact lauren.liddell-young@kent.gov.uk.

8) How do I log on Mosaic I have provided a privacy notice to an individual?

- The current process for recording a privacy notice is via the 'GDPR case note'. Details of the privacy notice should be added to the 'notes' field. If a privacy notice cannot be provided, it must be recorded in the 'notes' field.

9) How should I make individuals I support aware of changes to a privacy notice?

- This should be proportionate to the processing you are undertaking. [The Privacy Notice Guidance](#) (page 4) provides some examples of how you may share a privacy notice with intended individuals. It is good practice to use the same communication to share the privacy notice you used to collect the personal information from. For example, if collecting information via an online form, there should be the privacy notice included / link included so individuals can read the privacy notice before submitting their information.

Review Period

This document will be reviewed on a yearly basis (November). Any changes or updates will be reflected within the version control and circulated thereafter as soon as possible. However, updates to the FAQs will be changed throughout the year. Please ensure you use the most up-to-date copy of this document.

Please email lauren.liddell-young@kent.gov.uk regarding any updates or changes for this document.

Useful links

Guidance on privacy notices can be found at:

- <https://kentcountycouncil.sharepoint.com/sites/KNet/Pages/dpa-and-gdpr.aspx>
DPO's privacy notice guidance on Knet.
- <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/the-right-to-be-informed/what-privacy-information-should-we-provide/> - ICO's guidance on what privacy information should be disclosed.