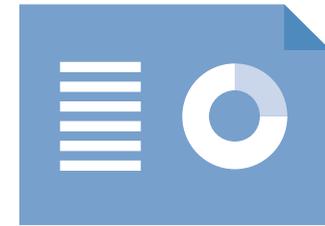


HC-One Ltd

Audit feedback

June 2020

Executive Summary



Information handling at HC-One Ltd.

HC-One Ltd operates over 300 care homes throughout the UK with specialist services in dementia, nursing, residential and specialist care for the elderly.

HC-One Ltd. processes the personal data of residents within their care homes, some of which is special category data and relates to medical history. It also processes the personal data of its staff which includes Disclosure and Barring Service checks and special category data.

The majority of the residents' records are manual with live ones being stored in a central station within the care homes and once not required for current care, then moved into local archiving pending eventual off-site archiving.

Visit focus

The Information Commissioner's Office (ICO), performed a consensual audit of HC-One Ltd, comprising a visit to the HC-One Support Hub in Darlington followed by a selection of 16 of HC-One's homes.

The document review and Support Hub visit took place in February 2020 with 7 site visits completed across the remainder of the month.

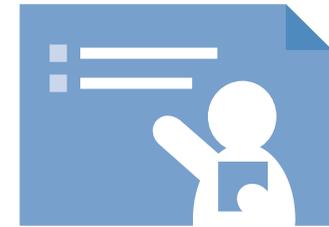
The Covid-19 outbreak in the UK meant that the full audit programme could not be completed however the ICO has produced this report based on the work that could be completed, with recommendations and guidance to assist HC-One in developing and improving its Information Governance (IG) infrastructure and controls.

Priority areas for improvement

ICO staff identified the following priority areas for improvement for HC-One:

- HC-One should complete their review Record of Processing Activities (RoPA), including all data flow mapping. They should also review all their lawful bases for processing, particularly where they are relying on consent as the lawful basis for processing to ensure it remains the most appropriate basis and that consent records are valid and up to date. HC-One has since advised that this action has been completed and the RoPA is a live document that will continually be updated as required. As a result HC-One should ensure ongoing formal reviews of the RoPA.
- HC-One should ensure that adequate and timely fair processing information is given to individuals when personal data is collected over the telephone.
- Staff at the care homes that may need to process simple SARs should receive formal training in order to do so.
- HC-One's archiving processes need revision for practical application. Procedures need to be sufficiently detailed and staff trained in order to achieve adequate retention, safe storage and transfer practices across all homes. The contents of local archives (including live records) in the homes should be recorded, formally reported to the Support Hub for monitoring and audited throughout the year.

Key findings & recommendations



Good practice

We noted some good practice as a result of our visit to HC-One Ltd and are encouraged to learn that some steps to minimise data protection risks have already been taken. Examples worthy of note are:

- HC-One has planned and initiated in-depth IG audits across the homes that will provide assurance on training and awareness, security, archiving practices and handling of subject access requests.
- HC-One has IG policies and guidance published on the Intranet for staff to follow. The “Here’s How To” range of condensed guidance on various IG topics is a particularly useful format for staff to quickly understand.
- HC-One is using cross-cut shredders across all the homes visited which ensures a greater level of security over the disposal of paper documents containing personal data.
- HC-One homes visited demonstrated commitment to IG training with high completion rates and good management oversight which gives greater assurance that staff will handle personal data appropriately. This was also reflected in staff at the support hub

Useful resources

In addition to the ICO guidance provided elsewhere within this report, we would like to draw HC-One's attention to the following which may be of assistance:

- a Guide to the GDPR;
- a GDPR FAQs document;
- a '12 steps to take now' graphic;
- Lawful basis interactive guidance tool;
- Getting it right: a brief guide to data protection for small businesses (pdf);
- Getting it right: small business checklist (pdf);
- Personal information online: small business checklist (pdf);
- A practical guide to IT security: ideal for the small business (pdf);
- A practical guide to IT security: ideal for the small business (Welsh language) (pdf);
- Training checklist for small and medium-sized organisations (pdf);

Finally

ICO staff were pleased to see that HC-One are taking a proactive approach to developing an understanding of data protection concerns.

We hope that the opportunity to discuss the various issues with us and the guidance provided within this report, will enable HC-One Ltd to raise awareness about data protection matters and improve current practice, policies and procedures. Finally, to keep up to date with the work of the ICO, HC-One Ltd may wish to subscribe to the ICO's [eNewsletter](#).

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rest with the management of HC-One Ltd.

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of HC-One Ltd. The scope areas and controls covered by the audit have been tailored to HC-One Ltd and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.