



## **Policy for handling completed SOHS Devon *Care Closer to Home* surveys**

All paper surveys are returned in sealed envelopes to a single address, where they are immediately stored in a locked cabinet.

Envelopes are only opened by a limited number of SOHS's representatives (see below under "Data processors").

Whenever envelopes are opened, the SOHS representative(s) must record their actions in the SOHS Survey Data Handling Logbook (also kept in the locked cabinet).

For each envelope that is opened, the following process takes place:

1. The patient's town, postcode, initials and date of birth given under "Personal Data" are entered into a computer application that returns a unique identifier, an age range code and an electoral division/ward.
2. The unique identifier, age range code, electoral division/ward and, if given, the gender are hand-written in the reserved section at the top of the first "Survey" sheet.
3. The "Introduction"/"Personal Data" sheet is separated from the "Survey" sheets. Both are subsequently stored separately in the locked cabinet.
4. Only information from the "Survey" sheets, including the hand-written entries in the reserved area, is entered into the online database. At this point, all respondents are thus rendered anonymous.

No reports or outputs of any form produced from the database or the "Survey" sheets will identify any individual survey participant.

Access to personal data will remain restricted at all times to a limited number of data processors (see below under "Data processors").

We will be running a pilot with the paper survey for an estimated five (5) weeks, during which time we will develop an online version. A high level of security will apply to the online version, with restricted access and password protection for the updating and retrieval of data. A detailed policy will be published once the online version has been developed.

## Data processors

Data will be processed by a small number of SOHS's representatives. The sole exception to this rule is in the event that SOHS permits a third party to contact respondents and/or assistants to verify their genuineness (see below under "Contacting respondents/assistants").

In this Policy, data processing covers: opening envelopes; reading the contents; processing personal data to produce anonymous identifying information; entering this information by hand on "Survey" sheets; separating "Introduction"/"Personal Data" sheets from "Survey" sheets; and entering survey responses into the online version of the survey.

Data processors may be determined on an ad hoc basis, but the total number must always be kept reasonably small and all handlers must comply with the following:

- 1) Before undertaking any data processing, prospective data handlers must first familiarise themselves with: the **"SOHS Devon Care Closer to Home Survey"**; this **"Policy for handling completed SOHS Devon Care Closer to Home surveys"**; and all applicable sections of the Information Commissioner's Office's **"Guide to Data Protection"** (available to read or download at <https://ico.org.uk/for-organisations/guide-to-data-protection/>).
- 2) Data processors are then added to the Register of SOHS Data Processors at the front of the "SOHS Data Handling Logbook", where they will be required to provide a name, address and signature. By signing the register, they confirm: that they have read and familiarised themselves with the above-mentioned documents; that they understand that data processing should be kept to the minimum necessary; that they are aware of the consequences, both personally and for an organisation, of breaching the Data Protection Act; that they will observe the security procedures set out in this Policy; and that they agree to, and will abide by, SOHS's rules.

### *Contacting respondents/assistants*

The survey asks respondents and, where applicable, assistants whether they are happy to be contacted with the sole purpose of verifying that they are genuine. They have the option to give a telephone number and/or e-mail address.

If SOHS takes up the option to contact respondents/assistants, all actions will be recorded in the "SOHS Data Handling Logbook".

If SOHS permits a third party to contact respondents/assistants, no more than two (2) persons representing the third party will be entitled to undertake the work. These individuals will also be subject to the conditions set out in numbers 1) and 2) above. They will only have access to "Introduction"/"Personal Data" sheets and NOT to "Survey" sheets. The sheets may be accessed solely for the purpose of obtaining the information that is required to carry out the work in question and may not be removed from the storage address under any circumstances.

### **Temporary removal**

"Survey" sheets may only be removed from the storage address by SOHS representatives for the purpose of inputting data into the online database. In this case, the removal may only be temporary and short term. Ideally, the sheets should be returned to the storage address on the same day that they are removed. If this is not possible, there must be a facility for the sheets to be locked away overnight and they should subsequently be returned at the earliest opportunity. In such instances, the removal and return must be recorded in the "SOHS Data Handling Logbook". In no other instances should "Survey" sheets leave the storage address.

### **Revision**

This Policy will first be revised where the need for such is identified or, at the latest, shortly after completion of the pilot phase of the survey. It will subsequently be revised periodically and as needed.

### **Entry into force**

This Policy will enter into force on 24 July 2017. It has been drawn up by the following SOHS representatives:

Ray Ashman: [signed] \_\_\_\_\_ [date] \_\_\_\_\_

Netti Pearson: [signed] \_\_\_\_\_ [date] \_\_\_\_\_