



Holistic Care And Wellbeing Support

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GDPR, Data Protection and Confidentiality Policy

1. Purpose

Sips & Smiles Holistic Care is committed to protecting personal data, respecting confidentiality, and complying with UK data protection law including the UK GDPR and Data Protection Act 2018. This policy explains how personal information is collected, stored, used, shared, and protected when providing services.

2. Scope

This policy applies to all personal data handled by:

Ms Xandria Noir (Sole Trader, Sips & Smiles Holistic Care)

It covers information relating to:

- clients
- family members and emergency contacts
- commissioners/funders (where relevant)
- suppliers and enquiries

3. Key definitions

- **Personal data:** information that identifies a person (name, address, DOB, phone, email)
- **Special category data:** extra sensitive data (health information, mental health, care needs, disability) Care services commonly involve special category data.
- **Processing:** collecting, storing, using, sharing, deleting

4. Data protection principles

Sips & Smiles will ensure personal data is:

- processed lawfully, fairly and transparently
- collected for specific purposes only

- adequate, relevant and limited
- accurate and kept up to date
- kept only as long as necessary
- kept secure
- handled in an accountable way

(These principles are the foundation of compliance.)

5. What information may be collected

Depending on the service, Sips & Smiles may collect:

- contact details (name, address, phone, email)
- date of birth
- emergency contact details
- care needs, dementia profile, triggers, preferences
- medication info (if required for safety planning)
- mobility/falls risks
- GP / care coordinator details (where relevant)
- visit notes / session notes
- incident records and safeguarding concerns
- financial records for invoices and payments

Only relevant data will be collected and used.

6. Lawful basis (why data is processed)

Sips & Smiles will only process personal data when there is a lawful basis, such as:

- contract (to deliver agreed services)
 - legal obligation (e.g., record keeping)
 - legitimate interests (running the service appropriately)
 - vital interests (emergency situations)
- Special category data (health/care data) will be processed only with an appropriate condition, such as: provision of health or social care/support
- safeguarding of individuals at risk

A lawful basis must be chosen before collecting/using data.

7. Confidentiality

All client information is confidential. Sips & Smiles will:

- never gossip or discuss clients informally
- only share information when necessary and appropriate
- keep session notes factual, respectful, and professional
- store information securely and restrict access

Confidentiality may be breached if required by safeguarding or law.

8. How information is stored

Sips & Smiles may store information:

- electronically (phone, laptop, secure cloud storage)
- in paper format (locked storage)
- in email messages relating to services

Security controls include:

- password protection and device lock
- two-factor authentication where possible
- secure Wi-Fi (not public networks for sensitive information)
- backups where appropriate
- paper records kept in a locked drawer/box
- documents are shredded when no longer needed

9. Sharing information

Information may be shared only when appropriate, such as:

- with emergency services (999) in an urgent situation
- with family/emergency contacts where agreed or necessary
- with a social worker/care coordinator where relevant
- for safeguarding reasons (local authority safeguarding team)
- with an accountant for tax purposes (limited financial records)

Sips & Smiles will not sell or share personal data for marketing.

10. Data retention (how long it is kept)

Personal data will be kept only as long as necessary for the purpose it was collected. Typical retention:

- client records and care notes: up to 6 years after service ends (unless there is a reason to keep longer)
- safeguarding/incident records: as long as necessary depending on seriousness
- invoices/tax records: at least 6 years (HMRC requirement)

11. Individual rights (clients' rights)

Individuals have rights including:

- access to their data (Subject Access Request)
- correction of inaccurate data
- deletion (in some situations)
- restriction of processing (in some situations)
- objection (in some situations)

Requests will be responded to within legal timescales (normally within 1 month).

12. Breach management

A data breach includes:

- lost paperwork
- stolen phone/laptop
- wrong recipient emailed
- unauthorised access

If a breach occurs, Sips & Smiles will:

- contain the breach immediately
- assess risk to the individual
- record what happened and actions taken
- report to the ICO where required
- inform affected individuals where required

13. Data protection fee (ICO)

Sips & Smiles will complete the ICO data protection fee self-assessment and pay the fee required under the Data Protection (Charges and Information) Regulations 2018.

14. Training and awareness

As a sole trader service, Sips & Smiles will maintain basic GDPR awareness and follow ICO guidance for small organisations and sole traders.

15. Policy review

This policy will be reviewed:

- annually, or
- if services change, or
- after any serious incident or data breach