




Guideline for Security and Recording of Personal Hard Copy Data During Service Relocation

Is this document a:

Policy Procedure Protocol Guideline

Insert Service Name(s), Directorate and applicable Location(s):

Title of PPPG Development Group:	HSE Working Group		
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1.0 Initiation

All staff working in the HSE is legally required under EU and Irish legislation to ensure the security and confidentiality of all personal data they collect and process on behalf of service users and employees.

In line with the GDPR principle of **Integrity and Confidentiality**, personal data must be processed by the HSE only in a manner that ensures the appropriate level of security and confidentiality for the personal data. To achieve this end, the HSE has developed this guidance as an organisational measure to protect against unauthorised or unlawful processing and against accidental loss, destruction, or damage when services are moved from one location to another.

1.1 Purpose

- 1.1.1 The purpose of this document is to provide guidance on the requisite technical and organisational measures for the security of personal and confidential hard copy data during service/location moves
- 1.1.2 All hard copy personal data must be managed, stored and disposed of according to its classification, business requirements and retention period.

1.2 Scope

- 1.2.1 The scope of this guidance includes all hard copy patient data required to be moved from one area to another as part of a service re-location
- 1.2.2 The guidance is intended for all health and social care services that process personal data and that are re-locating from one area to another
- 1.2.3 The guidance applies to all clinical and non-clinical HSE staff who are responsible for personal and confidential data during a re-location of a service from one area to another

1.3 Objective(s)

1.3.1 The objective is to provide guidance for the security and recording of personal and confidential hardcopy data during the relocation of a service from one area to another.

1.4 Outcome(s)

1.4.1 The expected outcome of the guidance is that all personal and confidential data is secure during service relocation.

1.5 Supporting Evidence

- The General Data Protection Regulation (GDPR) May 2018
- Data Protection Act (1988-2018)
- The following documents set out the purpose of how personal information is collected, used and the measures that are taken to protect that information by the HSE as data controller and data processor.
 - HSE Data Protection Policy (2019)
 - HSE Private Notice – Patients & Service Users (2020)
 - Information Classification & Handling Policy (2013)

1.6 Outline of procedures for securing hard copy data during office moves

1.6.1 A Data Protection Impact Assessments should be undertaken to consider the risk to personal data when undertaking a service relocation

1.6.2 Outline a systematic and methodical project plan for managing the transfer of information. Ensure all staff involved are familiar with the plan and briefed accordingly.

1.6.3 The scale of the project plan will be dependent on the extent of the move.

1.6.4 Nominate an appropriate person to co-ordinate/oversee all information security/data protection issues regarding a relocation This person must ensure that any necessary documents are completed and that processes are followed correctly

1.6.5 When using external companies a method statement will be required outlining how the data will be securely transferred during the move.

1.7 Steps

1.7.1 Create an inventory of the contents of each container/ box once filled and hold separately.

1, 7.2 Crates or boxes should be clearly labelled with the following:

- 'Confidential Records'
- Name of person responsible
- Department/Directorate
- Full delivery address including postcode
- Telephone number
- Number of confidential container e.g. "1 of 10"

1.7.3 Containers of confidential records must be secured, prior to being moved.

1.7.4 Containers of confidential records should not be left unattended and should be delivered by an authorised person to the agreed location.

1.7.5 Following the move, the responsible person should check all secure containers against the inventory of contents.

1.8 Training

1.8.1 All HSE staff who are involved in the relocation project are required to complete the online awareness programme '*The Fundamentals of GDPR*' on HSELand.

1.9 Compliance.

Following the location move, the records need to be inspected against the original inventory list and when completed signed and dated by the nominated responsible person.