

Setting up careLINK for GDPR – a guide

Choose your permissions carefully (and now!)

Decide what questions you want to ask your contacts / what preferences you want to give them.

Different groups of contacts (clients, volunteers) will have different needs. So consider them separately. Include, if you have them, 'club' members, as well as 'other' contacts (neither clients nor volunteers).

Probably the minimum you'll need are:

- Is it okay for us to keep your information?
- Is it okay for us to send you general newsletters / mailings?

Other ideas that some of you already came up with ...

- Okay to share information with other organisations (incl NHS)
- Okay to share information with family
- Willing to appear in photos/publicity
- Okay to have background checks carried out (for new volunteers) *[only relevant to volunteers obviously]*
- Okay to receive information about classes and lunch clubs

And perhaps things like this ...

- Okay to receive information about fundraising
- Okay to receive information about membership
- Okay to receive information about other useful organisations and services

Consider the future (as far as possible)

Especially as the new GDPR rules are based on **people opting in** rather than opting out.

So, for example, if in a year's time, you wanted to send out a new mailing - say about other useful organisations and services ...

- The strictest option (most in line with GDPR) would be that you'd check with every contact first.
- The next best option would be if you had previously asked people "are you happy to receive general mailings from us?" – this **perhaps** provides you with the agreement to send them new mailings (that they can then opt out of) *
- The least best option would be to assume that, if they have said yes to other specific mailings, you can send them a new one?

* careLINK allows you to create a new question (X) and, for each client who has already said "yes" to an existing question (B), set that client's response to X to "yes" too (with a note that it's an implicit permission rather than explicit)

Priority Req'd (GDPR 'legal' questions)

Identify which question(s) are to be 'Priority Req'd' – these are the question(s) that contacts **must** say yes to, to allow you to legally store data on them.

Opting in or out of individual/specific mailings are not 'Priority Req'd' questions. They could be considered to be 'optional' questions.

Will you record the source of where permissions were given?

Decide whether you will be recording 'Where' people responded from – i.e. where the question was asked: on joining leaflet / direct question by phone or email / at an event etc)

Professionals

Identify professionals and mark them as such (it's a tick box on the main Contact tab and also on the new GDPR tab).

careLINK then sets their permissions to "not required" – so mailings will get through whether they have given permission or not yet answered.

Of course, they can opt out of mailings at any time (they will not get a mailing if they have said 'No').

Note: This is based upon my understanding that you **do not need to ask permission** to store professionals' non-personal information as this is already in the public domain.

However, you **do need to ask permission** for professionals who are also a client and/or a volunteer.

Tip: one way of identifying some of the professionals on your system (assuming you've been entering organisation names) is to go to the list screen and sort by organisation name. then switch back to the general screen and tick the first few (using the arrow keys to move to next record).

Gathering permissions

It is currently unclear whether Caring organisations need clients' consent to store their data and/or to send mailings to them.

Kingscare has approached the Information Commissioner's Office twice and had conflicting advice on this.

Consider what combination of methods you are going to use to gather people's permissions:

- Through mailings (email and/or postal). For example ...
 - Initial mailing using email and post (for contacts without email)
 - Reminder to non-responders in a few weeks
 - Finally, phone the remaining non-responders
- Over time, as people attend classes/events (I could add an option to include any missing permissions to attendee lists)
- Over time, as you contact people for other things

Recommendation: consider improving your communication options at this stage

This whole process could be combined with a strategy to gather people's email addresses and perhaps also people's mobiles (especially useful for volunteers).

This could give you more flexibility/choice/options (different methods for different needs; ability to send texts for urgent requests etc) and reduce costs.

This does raise the issue of whether to give contacts the choice of how they are sent information which careLINK does not yet handle but could.

Anonymising contacts

How to deal with contacts where there has been no contact for x months

Initially this could be a big job for some of you.

careLINK has a number of features that can make this process easier, more efficient and provide structure to it.

I suspect this will be different for each of you, and dependent upon your existing data (some of you have records going way back, some of you only work with clients for a short time, while some have a 'lifetime' relationship), require different approaches.

I suggest that each of you discuss your own needs and thoughts with me and together we'll come up with a strategy.

For example, if you have a lot of old clients, one strategy would be to anonymise them in stages with the most out of date first.

So, you could set the "months for no contact" and "months since expiry" numbers in Settings to a large number at first. Then select all those contacts (from the Main Menu) and deal with them.

Then for each stage, reduce the number and repeat the process.

You might also want to identify those with no contact and try getting in touch with some of them first:

- Add a History type record and call it something like 'chase up'
- Select all no contact records from the Main Menu
- Go through and any that you want to chase up add a history record with the new history type 'chase up'
This will mean it will no longer appear in the no contact for x months – but you can find them by using the advanced selection and searching for that type of history record
- Go back to main menu – select all remaining and anonymise them all in one go (see video)
- Go through the contacts with 'chase up' and try getting in touch
- For a successful reconnection add a new history record and delete the 'chase up' record
- For an unsuccessful reconnection delete the 'chase up' record and then anonymise the contact

Missing features/outstanding issues

- Ability to print a contact's full details (will be needed under GDPR rules – if requested by contact)

Currently only options are these ticked ...

Choose what to include from lists below (any marked * will be limited by period above)

<input checked="" type="checkbox"/> Phone, email, address <input type="checkbox"/> Relationships <input type="checkbox"/> Ext contact (for client hist recs) <input type="checkbox"/> History <input type="checkbox"/> Outcomes <input type="checkbox"/> Links to docs/web pages <input checked="" type="checkbox"/> Personal data <input type="checkbox"/> Preferences	Client details — All client on/off <input checked="" type="checkbox"/> Medical information <input checked="" type="checkbox"/> General information <input type="checkbox"/> Benefits <input type="checkbox"/> External services used <input checked="" type="checkbox"/> Services/classes <input checked="" type="radio"/> Summary <input type="radio"/> Detailed <input type="checkbox"/> Volunteers assigned <input checked="" type="checkbox"/> Holidays
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- Ability to record contacts' preferred mailing method (e.g. "I prefer to be contacted by email please")
- Ability/option to display any missing GDPR permissions to attendee lists (so you can ask them when they arrive)
- Ability to do a mail merge with an attachment