Information Governance, Data Protection and Data Quality Framework Policy

Policy implemented:	May 2026
Last reviewed:	April 2026
Next review due:	April 2028

EQUALITY AND DIVERSITY STATEMENT

Salutem Care & Education is committed to the fair and equitable treatment of all individuals in accordance with the Equality Act 2010. An Equality Impact Assessment has been completed for this policy to ensure it can be applied consistently and without discrimination. Salutem Care & Education is committed to safe, high-quality, person-centred services that uphold people's rights and dignity.

All colleagues (including volunteers, agency workers and contractors) must follow this policy, guided by our values. Policies are reviewed every two years; if a review is delayed, the current version remains in force until approved by the Policy Sponsor.

Training will support understanding, and people we support will be involved in reviews. Local procedures may support this policy, but corporate policies must not be changed locally without formal approval.

This policy must be shared with all colleagues. The controlled version is on BLINK; printed/downloaded copies may be out of date.

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

1. Summary

This Information Governance, Data Protection and Data Quality Framework Policy sets out how Salutem Care & Education manages information **lawfully**, **securely**, **accurately**, and **effectively** across the organisation.

The policy brings together:

- **Part A: Information Governance and Data Protection** (legal and statutory compliance)
- **Part B: Record Keeping and Data Quality Standards** (accuracy, completeness, and effective use of information)

This framework must be read alongside the **Records Management Policy**, which governs record creation standards, retention, archiving, and secure disposal. Together, these documents provide Salutem's end-to-end approach to information lifecycle management.

This policy aims to:

- Ensure compliance with applicable **data protection, confidentiality and information governance** requirements
- Protect the **rights and freedoms** of individuals whose information we process
- Support safe, effective, person-centred care and education through **high-quality record keeping**
- Ensure appropriate governance, oversight, and learning from data quality issues and security incidents
- Provide a clear framework for secure information handling across all formats (electronic, paper, audio, visual)

And covers all information assets, including:

- Personal data and special category data (health, safeguarding, disability etc.)
- Care and support records, education records, safeguarding records
- Workforce/hr records
- Corporate and commercially sensitive information
- Information held within systems and platforms (e.g., care planning, emar, rostering, hr systems, SharePoint)

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

2. Document Control

Policy Sponsor (Name & Role):	Melinda Glover, Quality Assurance Inspection & Regulation Director
Policy Reviewer (Name & Role):	Chris Bell, Improvement and Development Manager (Data Protection Officer)
Approved by (Name/Role):	Melinda Glover, Quality Assurance Inspection & Regulation Director
Date Implemented:	May 2026
Last Reviewed:	New Policy merged (Quality Data Policy, Salutem Information Governance, and Data Projection Policy)
Next Review Due:	April 2028
Version Number:	V1.0
Controlled Copy Location:	☒ BLINK ☐ Education Policy Hub
Policy category (tick):	☐Safeguarding ☐ Care practice ☐ Education ☐ Other: [ ] ☐ Health & Safety ☐ HR/People ☒ Information Governance
Policy Applies to:	**People we Support** ☒ Children/young people ☒ Adults ☒ Learners ☒ Families/Carers **Workforce** ☒ Permanent ☒ Bank ☒ Agency ☐ Other: [ ] ☒ Volunteers ☒ Contractors

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

3. Contents

1. Summary 2
2. Document Control 3
3. Contents 4
4. Definitions 5
5. Principles 6
6. Part A: Information Governance & Data Protection (Legal / Statutory) 7
7. PART B: RECORD KEEPING & DATA QUALITY STANDARDS 9
8. Data Protection Complaints 10
9. Learning and Development 11
10. Roles, Responsibilities, Consent & Capacity 11
11. Associated Documents 13
12. Legal & Regulatory Framework 13
13. Version Control 14
14. Appendices 14

Appendix A — 15

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

4. Definitions

4.1 Personal Data – Any information relating to a **living individual** who is **identified or identifiable**, either directly (e.g., name) or indirectly (e.g., ID number, location data, online identifier), including where identification is possible when combined with other information.

4.2 Special Category Data – A subset of personal data that is particularly sensitive and requires enhanced protection. This includes information about an individual's **health** or **disability**, **racial or ethnic origin**, **religious or philosophical beliefs**, **biometric or genetic data** (where used for identification), and data concerning a person's **sex life** or **sexual orientation**.

4.3 Criminal Offence Data – Personal data relating to **criminal convictions and offences**, alleged offences, cautions, or related security measures. This data must only be processed where there is a clear lawful basis and an appropriate legal condition, with **additional safeguards** and restricted access due to its sensitivity.

4.4 Information Governance (IG) – The organisational framework of **policies, procedures, standards, roles, and controls** that ensures information is managed **lawfully, securely, efficiently, and appropriately** throughout its lifecycle, including collection, use, storage, sharing, retention, and disposal.

4.5 Event – Any observable occurrence involving information or systems that does not necessarily result in harm or compromise. Events may include **near misses** and should be reported where they indicate risk or learning (e.g., confidential records temporarily left unsecured but recovered before access occurred).

4.6 Incident – An event that has an actual adverse effect on the **confidentiality, integrity, or availability** of information or systems (e.g., misdirected email, unauthorised access attempt, loss of paper records, or system outage affecting access to records).

4.7 Personal Data Breach – A type of security incident that results in the accidental or unlawful **destruction, loss, alteration, unauthorised disclosure of, or access to** personal data. This includes breaches affecting confidentiality, integrity, or availability (e.g., stolen device, incorrect system permissions, or data sent to the wrong recipient).

4.8 Data Protection Impact Assessment (DPIA) – A documented assessment used to identify and reduce risks to individuals' rights and freedoms where processing is likely to be **high risk** (for example, introduction of a new system, large-scale processing of health/safeguarding data, surveillance/monitoring, significant data sharing, or innovative technologies such as AI). DPIAs must be started early and inform design decisions ("data protection by design and by default").

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

4.9 ROPA (Record of Processing Activities) – A formal record required under UK GDPR that documents how Salutem processes personal data, including the **purposes of processing**, categories of data and individuals, lawful bases, data sharing arrangements, retention periods, and security measures. ROPA supports accountability and provides evidence of compliance

5. Principles

Salutem's information governance is underpinned by the following principles:

5.1 Lawfulness, fairness and transparency: We process information only where there is a **clear purpose** and a **valid lawful basis**, and we do so in a way that is fair and not unduly intrusive. We provide clear privacy information so that individuals understand how their information is used, and we handle information in a way that maintains trust and confidence.

5.2 Purpose limitation and data minimisation: We collect and use information only for **specified, explicit and legitimate purposes**, and we do not use it in ways that are incompatible with those purposes. We collect and share only the **minimum necessary** information required to deliver safe care, education, safeguarding, employment and governance functions.

5.3 Accuracy and data quality: We take reasonable steps to ensure information is **accurate, complete and up to date**. Records must be timely, clear and attributable, and corrections are made promptly where inaccuracies are identified. High-quality data supports safe decision-making, continuity of care, and reliable assurance.

5.4 Storage limitation: We retain information only for as long as it is needed for the purpose it was collected and in line with **legal, regulatory and contractual requirements**. We apply approved retention schedules and ensure information is securely deleted, destroyed or anonymised when no longer required.

5.5 Integrity, confidentiality and availability (security): We protect information against unauthorised access, loss, alteration or disclosure through appropriate **technical and organisational measures** (e.g., access controls, least privilege, secure storage and transfer, encryption where appropriate, audit trails, and staff training). Information is also managed to ensure it is **available** to authorised colleagues when needed to support safe care, education and operational continuity.

5.6 Accountability and assurance: We can demonstrate compliance through effective governance and oversight, including policies and procedures, training and competency checks, audits and

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

quality reviews, DPIAs, data-sharing controls, incident and breach logs, and reporting through appropriate management and governance forums.

5.7 Person-centred and outcome-focused recording: Records are created and maintained to support safe, effective, and person-centred care and education. They reflect the **voice, wishes, preferences and outcomes** of the people we support and learners, evidence involvement and decision-making (including MCA where relevant), and provide a clear, respectful, and defensible account of the support provided

6. Part A: Information Governance & Data Protection (Legal / Statutory)

6.1 Lawful processing and lawful basis: Salutem Care & Education will only process personal data where there is a clear, defined purpose and a valid lawful basis under the **UK GDPR**. Where we process **special category data** or **criminal offence data**, an additional lawful condition must also apply. The lawful basis and relevant conditions must be identified **before processing begins**, recorded in the **Record of Processing Activities (ROPA)**, and reflected in the relevant **privacy notice(s)**.

6.2 Privacy notices (transparency): We provide clear privacy information explaining how and why we use personal data, the categories of data processed, who we may share it with, how long we keep it, and how individuals can exercise their rights or raise concerns.

6.3 Records of processing (ROPA): We maintain and keep under review a **Record of Processing Activities (ROPA)** to evidence accountability. This includes (as applicable) processing purposes, lawful bases and conditions, categories of data and individuals, data sharing arrangements, retention periods, and security measures.

6.4 Data subject rights: Individuals' rights requests are logged, acknowledged and responded to **without undue delay** and normally within **one calendar month**, in line with **ICO guidance**. Extensions are applied only where requests are complex or multiple, and individuals are informed accordingly. Requests are coordinated by the **Information Governance Team**, with identity verification and decision-making documented.

6.5 Data Protection Impact Assessments (DPIAs)
A DPIA must be completed where processing is likely to result in a **high risk** to individuals' rights and freedoms (for example, new systems, large-scale processing of special category data, surveillance/monitoring, significant data sharing, or innovative technology such as AI).

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

- **Ownership:** The relevant system owner, project owner, or process owner is responsible for completing the DPIA.
- **Mandatory DPO review:** All completed DPIAs must be submitted to the **Data Protection Officer (DPO)** for review. The DPO provides independent advice and challenge, including whether residual risks are acceptable, require further controls, or need escalation. The DPO does not complete DPIAs on behalf of the organisation and does not assume ownership of the processing.

The detailed process is set out in the **DPIA Procedure**, which must be read alongside this section.

6.6 Data sharing and confidentiality: We share information only where it is **necessary, proportionate and lawful**, applying the **minimum necessary** principle. Where confidential information is shared, we ensure an appropriate basis exists (e.g., consent, safeguarding/public interest, legal requirement) and decisions are recorded. Information may be shared without consent where required to protect a person from harm or to meet safeguarding duties, in line with statutory guidance and local safeguarding arrangements. Where third parties process data on our behalf, we ensure appropriate contracts, confidentiality obligations and security requirements are in place.

6.7 Information security and access control: Salutem implements appropriate technical and organisational measures based on risk, including (as applicable):

- Role-based access controls and least privilege
- Secure storage and secure transfer methods
- Encryption and device security controls
- Audit trails and system monitoring
- Mandatory training and refresher training
- Supplier assurance and security requirements

6.8 Incident and breach management: All colleagues must report **immediately** any actual or suspected information security incident or personal data breach (including near misses), in line with the **Incident and Data Breach Management Procedure**, to enable prompt containment and risk reduction. Where a breach is assessed as notifiable, Salutem will notify the **ICO within 72 hours** of becoming aware of it, and will notify affected individuals where there is a high risk to their rights and freedoms.

6.9 Roles, accountability and oversight: Clear governance roles are assigned, including the **Senior Information Risk Owner (SIRO)**, **Caldicott Guardian**, and **Data Protection Officer (DPO)**. These roles provide strategic oversight, independent advice, assurance and escalation in line with statutory and regulatory requirements, supporting organisational accountability under the UK GDPR.

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

6.10 Contact: For data protection queries, rights requests, complaints, or incident reporting, contact: data.protection@salutemsharedservices.co.uk

7. PART B: RECORD KEEPING & DATA QUALITY STANDARDS

7.1 Record keeping principles: Records must be:

- **Accurate, factual and complete** (distinguishing fact, opinion, and third-party information where relevant)
- **Contemporaneous and timely**, recorded as close to the event/decision as possible
- **Clear, professional and respectful**, using appropriate language and avoiding jargon where possible
- **Attributable**, with entries **dated and linked to the author** (including role/position) and with clear version control where documents are updated
- **Consistent and auditable**, supporting internal assurance, external scrutiny, and continuity of care/education
- **Securely stored and accessible to authorised colleagues**, ensuring information is available when needed to support safe decision-making

7.2 Person-centred and outcome-focused recording: Records must reflect the individual's:

- Needs, strengths, preferences and desired outcomes
- Communication requirements and reasonable adjustments
- Involvement in planning and review (including evidence of co-production where appropriate)
- Decision-making and consent arrangements, including **mental capacity act (MCA)** considerations (capacity assessments and best interests decisions where required)
- Risk management and safeguarding considerations, including how risks are reduced in the least restrictive way

7.3 Use of data for quality, safety and improvement: High-quality data supports:

- Safeguarding and risk management
- Care planning and education outcomes
- Medicines and delegated healthcare governance (where applicable)
- Performance monitoring and service improvement
- Audit activity and closed-loop governance (learning → action → validation)
- Regulatory compliance and inspection readiness (CQC/Ofsted/CIW/Estyn as applicable)

7.4 Relationship to Records Management: This policy does not replace the Records Management Policy. Retention periods, archiving arrangements, and disposal of records must be managed in accordance with the **Records Management Policy** and published **retention schedules**.

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

7.5 Monitoring, audit and compliance: Compliance with record keeping and data quality standards is monitored through audits, KPIs, quality reviews, and management oversight. Findings and themes are reported through appropriate governance forums and to senior leaders. Where non-compliance is identified, proportionate action will be taken, which may include support, supervision, training, competency assessment, improvement actions, and—where necessary—formal management processes.

8. Data Protection Complaints

In accordance with the **Data (Use and Access) Act 2025 (DUAA 2025)**, Salutem Care & Education will maintain and operate a clear, accessible data protection complaints process. This enables individuals to raise concerns directly with the organisation where they believe their personal data has been processed in breach of the **UK GDPR** and/or the **Data Protection Act 2018**.

8.1 Right to complain: Any individual may make a data protection complaint if they consider that Salutem has infringed data protection law in relation to their personal data. Complaints may be made through any reasonable channel and do not need to reference legislation or use specific terminology to be valid.

8.2 Accessibility and publication: Salutem will ensure that the data protection complaints process is:

- Easy to locate, understand and use
- Available to all individuals (including people we support, learners, families/carers, colleagues, and members of the public)
- Clearly signposted via privacy notices and other appropriate communications
- Supported by at least one electronic method for submitting complaints

Where appropriate, existing complaints procedures may be used, provided they clearly and explicitly include data protection complaints and routes for escalation.

8.3 Complaint handling requirements: On receipt of a data protection complaint, Salutem will:

- Acknowledge receipt within **30 calendar days**
- Investigate the complaint without undue delay, making any necessary enquiries
- Keep the complainant informed of progress where the investigation is ongoing
- Provide the outcome without undue delay, including a clear explanation of the decision reached and any actions taken

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

These requirements apply regardless of complexity and are separate from statutory timescales for data subject rights requests (e.g., Subject Access Requests).

8.4 Escalation to the ICO: Complainants will be informed of their right to escalate their complaint to the **Information Commissioner's Office (ICO)** if they remain dissatisfied following Salutem's response. Individuals are normally expected to raise their complaint with the organisation first before the ICO will consider it.

8.5 Oversight, records and learning: Salutem will:

- Maintain records of data protection complaints, actions taken and outcomes
- Ensure appropriate oversight by the **data protection officer (dpo)** and **information governance team.**
- Use learning from complaints to inform continuous improvement, including policy updates, training, and strengthening of data protection controls.

9. Learning and Development

All colleagues must complete organisational induction and mandatory annual refresher training covering:

- Data protection and individual responsibilities
- Information security and secure handling
- Confidentiality and appropriate information sharing
- Recognising and reporting incidents/breaches
- Responding to rights requests (role dependent)

Role-specific training is provided for higher-risk functions (e.g., clinical/eMAR users, HR, safeguarding, education records).

10. Roles, Responsibilities, Consent & Capacity

10.1 Information Governance roles and responsibilities

Senior Information Risk Owner (SIRO): Provides **Board-level oversight** of information risk and assurance. The SIRO ensures that information governance risks are identified, managed, and escalated appropriately, and that effective governance arrangements and resources are in place.

Caldicott Guardian: Provides strategic oversight of **confidentiality and information sharing** relating to individuals' care and support. The Caldicott Guardian ensures that information

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

is shared appropriately, balancing the duty to protect confidentiality with the duty to share information where this supports safe and effective care.

Data Protection Officer (DPO): Provides **independent advice, oversight and assurance** on compliance with the **UK GDPR** and the **Data Protection Act 2018**. This includes oversight of:

- Lawful basis and privacy transparency,
- Data subject rights and data protection complaints,
- DPIA review and advice on high-risk processing,
- Incident and breach management (including regulatory reporting decisions).

Group Head of IT: Oversees the technical and organisational measures required to protect personal data and information systems, including access controls, cyber security, resilience, system monitoring, and secure configuration, in line with statutory and regulatory requirements.

Managers: Are responsible for local implementation of this policy, including ensuring colleagues understand their responsibilities, complete mandatory training, follow procedures, and escalate concerns promptly. Managers must take action to address non-compliance through supervision, support, and formal processes where necessary.

All colleagues (employees, bank, agency, contractors and volunteers): Must comply with this policy and associated procedures, complete mandatory training, handle information securely and confidentially, and report actual or suspected information governance or data protection incidents **immediately**.

10.2 Consent and capacity

Data protection consent: Where consent is used as the lawful basis for processing personal data, this is overseen through the **Information Governance Team** under the responsibility of the **DPO**, ensuring consent is informed, recorded, and can be withdrawn.

Care and treatment consent: Consent relating to care, support and treatment decisions sits with the relevant operational directorates (Adults, Children's and Young People's), and must be managed in line with professional standards and applicable legislation.

Mental Capacity Act (MCA) 2005: Where an individual aged **16 years or over** may be unable to provide valid consent or make a specific decision, colleagues must apply the **Mental Capacity Act 2005**. Decisions about the use and sharing of personal information must be:

- Based on a **decision-specific capacity assessment**,
- Made in the person's **best interests** where capacity is lacking,
- The **least restrictive** option, and

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

- Appropriately involve family members, advocates, or lawful representatives where required.

Shared responsibility: All colleagues remain responsible for adhering to organisational policy and procedure at all times, including recognising potential capacity issues, seeking advice where needed, and escalating concerns promptly through appropriate safeguarding and information governance routes.

11. Associated Documents

The Information Governance and Data Quality Framework Policy has been developed following a comprehensive review of relevant **statutory legislation**, **regulatory expectations**, and Salutem's internal governance arrangements. It is designed to provide a single, coherent and consistent approach to information governance across Salutem, supporting legal compliance, effective oversight, and the protection of individuals' rights.

Salutem policies and procedures supporting this framework

This policy is supported by, and must be read alongside, the following organisational policies and procedures (as applicable):

- Records Management Policy (including retention schedules)
- Information Security Policy / Information Security & Professional Communications Policy
- Privacy Notice(s)
- Data Sharing / Information Sharing Procedure
- Information Requests Procedure (including SARs and other statutory requests)
- Surveillance / Monitoring Procedure (e.g., CCTV and other monitoring technologies)
- Incident and Data Breach Management Procedure
- Data Protection Impact Assessment (DPIA) Procedure
- Lawful Basis and Special Category / Criminal Offence Data Processing Procedure
- International Transfers Procedure (where applicable)

This approach ensures that data protection, information governance, and data quality requirements are addressed through a clear, consistent and robust framework, supporting regulatory compliance, effective assurance, and safe, lawful handling of information across all Salutem services.

12. Legal & Regulatory Framework

In developing and reviewing this policy, reference has been made to the following legislation and regulatory frameworks:

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- Data (Use and Access) Act 2025 (DUAA 2025)
- Common law duty of confidentiality
- Human Rights Act 1998 (including Article 8)
- Freedom of Information Act 2000 (where applicable)
- Access to Health Records Act 1990 (where applicable)
- Care Act 2014 and Children Act 1989 & 2004 (where applicable)
- Mental Capacity Act 2005 (where applicable)
- ICO guidance and Codes of Practice
- Relevant regulatory expectations and inspection frameworks, including CQC, Ofsted, CIW, and Estyn (as applicable to the service)

13. Version Control

This is a controlled document. As a controlled document, any printed copies of this document, or saved onto local or network drives should be actively monitored to ensure the latest version is always available.

Version Number	Date	Author	Summary of Changes	Approved By
V1.0	May 2026	Chris Bell	New consolidated framework policy replacing IG & DP Policy and Quality Data Policy	Melinda Glover

14. Appendices

- Appendix A: Data subject rights (summary)

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.

Appendix A —

Individuals have the right to:

- Be informed about how their data is used
- Access their personal data
- Rectify inaccurate data
- Erase data (where lawful and applicable)
- Restrict processing
- Object to processing (where applicable)
- Data portability (where applicable)
- Rights relating to automated decision-making and profiling
- Complain to Salutem and/or the **ICO**

Rights requests are handled in line with section **6.4**

In this policy, "the Organisation" means Salutem Care & Education [Salutem Ld Bidco Iv Limited, Pathways Care Group Limited, Pathways 4 Care Ltd, Modus Care Limited, Clearwater Care (Hackney) Limited, Greenfield Close Residential Home Limited, Salutem Shared Services Limited, Salutem Shared Services Ii Limited, Salutem Shared Services Iii Limited, Modus Care (Plymouth) Limited, Salutem Ld Bidco Limited, Salutem Ld Bidco Ii Limited, Salutem Ld Topco Limited, Salutem Ld Topco Ii Limited, Newlife Care Services Limited, Pathways Daycare Limited, Amity Residential Care Limited]. References to "Salutem" are used as a short form.