

Lions Home For The Elders Personal Data Protection Policy

1. Objective

To ensure that the management of personal data obtained is managed in compliance with the Personal Data Protection Act (PDPA).

2. Scope

The policy and procedure is applicable to the departments in Lions Home For The Elders (LHE) to execute control and consistency in the collection, usage and disclosure of personal data.

3. PDPA Officer

The Chief Executive Officer (CEO) is the interim PDPA Officer, responsible for the monitoring and reporting of all data stored in LHE. Disclosure of data other than for the purpose of submission to the relevant authority, the Heads of Department must inform the CEO.

4. Purposes of Departments Collecting & Storing of Personal Data

4.1 Finance Department

4.1.1 Donors Data

- a) Submission to Inland Revenue Authority of Singapore (IRAS)
- b) For presentation to auditors
- c) Mailing of receipts / thank you letters

4.1.2 Residents & Next-of-kin

- a) For invoicing bill statement
- b) For presentation to auditors
- c) Submission to Ministry of Health (MOH) and Agency for Integrated Care (AIC), via billing portal, Intermediate & Long Term Care (ILTC) Portal

4.1.3 Employees

- a) Payroll submission to banks
- b) Submission to IRAS & Central Provident Fund (CPF)
- c) Annual internal and external audit
- d) Submission to MOH and AIC

4.2 Human Resource Department

4.2.1 Employees

- a) Employees' personal files
- b) Submission to MOH
- c) Submission to ILTC Portal
- d) Job applicants' application forms

4.3 Corporate Communications Department

4.3.1 Donor & Volunteers

- a) Annual Recognition Awards
- b) Mailing of appeal letters
- c) Mailing of LHE newsletters
- d) Mailing of season greeting cards
- e) Mailing of thank you cards

4.4 Public/Social Welfare Department

4.4.1 Guarantor & Next-of-kin

- a) Submission to Finance Department for billing
- b) Contact in the event of emergency to inform of residents' condition
- c) For the evaluative purposes in relation to the grant and financial assistance

4.4.2 Residents

- a) Submission to ILTC Portal
- b) Medifund applications
- c) Application submission to Government agencies for financial assistance
- d) Discussion at Clinical Case Conference
- e) Referrals to and from AIC, social workers from regional hospitals

4.5 Clinical Department

4.5.1 Healthcare & Government Authorities

- a) Hospitals
- b) National Electronic Health Record Department
- c) Law Enforcement
- d) Coroner's Court
- e) Legal Institution
- f) Research Institution (A separate consent form to be obtained from the Institution)

5. Responsibility

- 5.1 The Head of the Finance Department is to ensure that all donors' data is restricted to Finance Department staff solely and the storage of personal data soft copies are encrypted with a protected password.
- 5.2 The Head of Human Resource Department and the Head of Finance Department who are responsible for LHE staff personnel data are to ensure that access to personal files is secured, both soft copies and hard copies. The Human Resource Department is to ensure that all jobs applicants' data are kept in its department only. Data is to be destroyed if it is no longer required for the purpose of which it was first obtained.
- 5.3 The Head of the Public/Social Welfare Department is responsible for ensuring that residents and their next-of-kin data are properly stored and filed in the department. Disclosure of this data is limited to the departments which require usage of it for the specific purpose of their operations.
- 5.4 The Senior Corporate Communications Executive in the Corporate Affairs Department responsible for corporate and volunteers data must ensure that their consent is sought for publication of communications related materials.

6. Procedure

6.1 Solicited Donation

6.1.1 Consent / Purpose Limitation / Notification Obligation

All Donation Forms (through website, appeal related materials) must include a clause to state the confidentiality of donors data, obtain consent the ways the personal data will be disclosed.

6.1.2 Provision for Withdrawal of Consent

All Donation Forms must include instructions and contact details for individuals to withdraw their prior consent to the ways their personal data might be disclosed.

6.2 Accuracy Obligation

6.2.1 Publication Materials

Corporate organisations and volunteer groups must verify and consent to the:

- a) Content of data
- b) Intended usage of data

before the disclosure of such information. Written consent, in the form of email or fax must be obtained and filed in the programme files.

6.3 Protection Obligation

6.3.1 Personal Data Confidentiality

- a) All personal data are classified as confidential, and accessible to only authorised and need to know personnel, relevant Government Authority, and Agencies appointed by Government Authority.
- b) All personal data obtained are strictly the property of LHE and shall not be removed or duplicated by any staff when they leave the employment of LHE.

6.3.2 Databases & Project Files

- a) Soft copy databases must be password protected where applicable and stored in the dedicated department's drive.
- b) Access to the softcopy databases should only be given to authorised staff.
- c) All staff are not permitted to save any copies of databases in their own computer hard drives or portable storage drives.
- d) Records of personal data consent for the collection, usage and disclosure or withdrawal must be filed in the respective department's master file.
- e) Any change in personal data must be updated by the relevant department accordingly.
- f) Hard copies of personal files must be kept strictly under the department's care in locked cupboards.

6.4 Retention Limitation Obligation

6.4.1 Project Files & Printed Records

Printed records containing personal data are archived for period of 7 years. Thereafter, where the information is obsolete or not required, printed records should be destroyed.

6.4.2 Review

A review of personal data should be conducted on a regular basis to determine if that personal data is still needed to serve its purposes.