



Restricting processing of profiles

Restricting processing

Overview

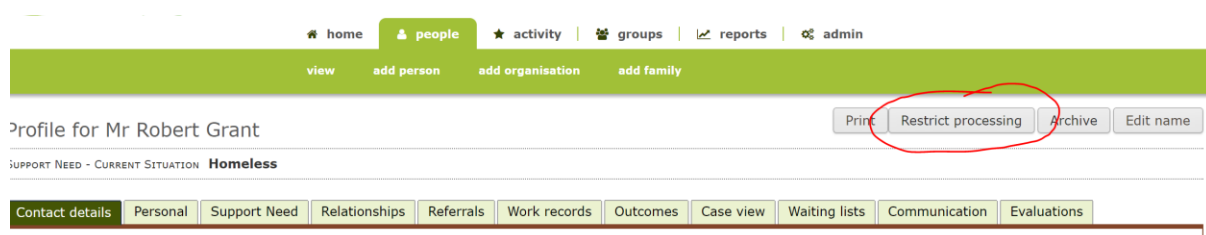
Under Articles 18 of the General Data Protection Regulations data subjects have the right to request that the processing of their data be restricted in certain circumstances (Art 18(1)(a)-(d)). If a data subject requests that processing be restricted then their data can still be stored but cannot be processed unless it is with their consent or it relates to legal claims, the rights of others, or reasons of important public interest (Art 18(2)).

According to Recital 67 of the GDPR, in automated filing systems such as Lamplight, the data should not be subject to further processing operations while it is restricted, and it should not be possible to change the data. The system should also clearly indicate that the profile has been restricted.

Lamplight allows you to restrict the way in which a profile is processed and then allow processing again should the restriction be lifted. **The data subject** should be notified before the restriction is lifted (Art 18(3)).

How to restrict processing of a profile

Within Lamplight you can restrict processing of a profile by opening that profile and clicking the 'restrict processing' button on the right-hand side of the profile:



When you click this button, you will be asked to confirm that you wish to restrict processing. Click yes and the profile status will be changed, and you will go back to the home page.

Once you have restricted processing of a profile, you will not be able to:

- See them in searches
- Find them in list views
- See them in groups

- Include them in reports
- See them in records

In a future update, it will not be possible to edit the profile either.

Viewing restricted profiles

System administrators can view restricted profiles. Go to people > view and in the search set 'Limit list to' 'People restricted for processing'. Click the 'fetch data' button. This will allow you to find profiles again where the processing restriction needs to be lifted.

The screenshot shows the 'User records' search interface. At the top, there is a navigation bar with links for home, people, activity, groups, reports, and admin. Below this is a secondary navigation bar with links for view, add person, add organisation, and add family. The main search area has a 'Search' header and a 'Click to change filters to see more or fewer records.' instruction. The 'Search text' field is empty. The 'Limit list to' dropdown is set to 'People restricted for processing', which is circled in red. The 'View people' dropdown is set to 'All'. A 'fetch data' button is located in the bottom right corner of the search area. Below the search area, there is a section for 'Current users on the system' with a table of records. The table has columns for menu, ID, Name, First name, Alternative name, Phone, Mobile, Email, Website, Address line 1, Postcode, and Surname. The first record is for Robert Grant with ID 108.

menu	ID	Name	First name	Alternative name	Phone	Mobile	Email	Website	Address line 1	Postcode	Surname
	108	Robert Grant	Robert							B7 9UN	Grant

From here you can view the profile: click on the name as usual. You will see a warning message.

The screenshot shows the profile page for Mr Robert Grant. At the top right, there are buttons for 'Print', 'Allow processing', 'Archive', and 'Edit name'. Below these is a red-bordered warning box that says: 'This profile has been flagged for restricted processing under GDPR rights. You MUST NOT use it.' Below the warning box is a navigation bar with tabs for 'Contact details', 'Personal', 'Support Need', 'Relationships', 'Referrals', 'Work records', 'Waiting lists', 'Case view', 'Outcomes', 'Tasks', 'Groups', and 'Communication'.

If the restriction needs to be lifted, and the data subject has been notified that the restriction is lifted, you can 'Allow processing' by clicking the button.

Difference to 'archived' profiles

Firstly, there is a difference in meaning. 'Archived' profiles are likely to be people that have stopped using your services, so you don't need their data day-to-day, but would still want to include them in reports. 'Restricted processing' is a particular right for data subjects under the GDPR; where this

request has been made it is highly likely that there are other processes under way within your organisation (for example questions about the accuracy or lawfulness of the data or relating to a legal claim).

Functionally, there are two differences within Lamplight. Firstly, the warning message is different when viewing a profile. Secondly, restricted profiles won't be counted in reports; archived profiles will be.

Make sure that your staff are happy with the difference between these two functions.

Permanently deleting profiles

Under Article 17, a service user can request that their data be deleted from the system. System admins can permanently delete profiles; this irrevocably removes profile data and optionally other connected data. When someone has requested restricted processing, they may also require you not to delete their data. There is another Lamplight factsheet on how to delete data from Lamplight.