



Deleting Profiles and the Right to be Forgotten

Lamplight and the Right to be Forgotten

One of the central principles of the General Data Protection Regulation is that of storage limitation. Personal data should be kept in a form which permits identification of the data subject for not longer than is necessary or the purposes for which the personal data are processed (Article 5(1)(e)). You will need to manage how long you store personal data relating to your clients, staff, volunteers, members or contacts. There is a Right to Erasure under Article 17 of the GDPR so that Data Controllers must delete Personal Data in certain circumstances. Lamplight allows you to meet your obligations in a number of different ways.

There are three ways of managing profiles:

1. Restricting processing
2. Archiving
3. Deleting

Restricting Processing

Restricting processing is not the same as archiving or deleting data. Restricting processing is a distinct right of the Data Subject under Article 18 of the GDPR. It is important that the processes and requirements are properly observed.

We have detailed Factsheet describing how to manage this in Lamplight: *Restricting Processing of Profiles*. Please consult this document for more information.

Further information on the right to restriction of processing can also be found on the ICO website here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

Archiving

Sometimes you will not want to remove a profile from your system entirely but merely hide it from day-to-day processing. Perhaps you have not worked with a person for a while but are still required to retain a copy of their profile for a period of time.

Profiles can be hidden in Lamplight by archiving them. When you archive a profile, it will not be shown in the live search, groups or lists of current clients. However, the profile will still be shown as attending records created for them before they were archived. They will also appear in reports of work, referrals, outcomes etc.

To archive a profile, you will need to have manager level access to the system or above.

1. Open the profile of the person or organisation you wish to hide.
2. At the top right-hand side of the profile there are a row of buttons. Click the archive button.



3. A pop-up will ask you if you are sure that you wish to archive the profile. Click OK.

Profiles can be un-archived by system administrators.

1. On the main menu bar select People > View > User > All
2. In the search bar across the top of the table click to change the filters where indicated.
3. In the dropdown box limit the list to “Archived people”.

The screenshot shows a search interface with a green header bar containing the word "Search" and the instruction "Click to change filters to see more or fewer records." Below this are three labels: "Search text" with an input field, "Limit list to" with a dropdown menu, and "View people" with a button. The dropdown menu is open, showing four options: "Current people", "Current people", "Archived people" (highlighted in blue), and "People restricted for processing".

4. Find the profile you wish to un-archive in this list and click on the name to open it.
5. The profile will have a large red box across the top to indicate that it has been archived and should not be used. Please consult your policy on data archiving before un-archiving the profile.

The screenshot shows a profile page for "Mr John Smith". At the top right, there are three buttons: "Print", "Un-archive" (circled in red), and "Edit name". Below the name is a large red-bordered box containing the text "This profile has been archived. Please do not use it." At the bottom, there is a horizontal menu with several tabs: "Contact details", "Personal Details", "Relationships", "Support need", "Previous addresses", "Alerts", "Case notes", and "Support plan".

6. To un-archive the profile, please click on the Un-archive button on the top right-hand side of the profile.

Deleting

It is also necessary for Data Controllers to be able to permanently erase data from their systems. System administrators can permanently delete profiles from within the Admin section of the Main menu. In the System Administration menu screen, data can be deleted permanently under the **Data Management** section.

Data management

Find and merge duplicate profiles

Geocode addresses

You can geo-code (add geographic information) to match it (at post-code level) to the Ordnance Survey publishing module. Postcodes that do not match will be

PERMANENTLY delete data

Danger! Permanently deleting data means it cannot be recovered.

This should be used with extreme caution as these will not be reinstated even by Lamplight staff.¹ The data is gone forever.

Permanently deleting data is a two-stage process and each step must be completed before deletion will take place.

Stage one

You can either search for single profiles to delete, select members of a specific group delete, select all archived profiles or tell Lamplight to search for profiles whose contact details, custom tabs and activity records have not been updated for a particular amount of time.

Delete members of group

or, find profiles that have been archived

or, find single profile:

or, find profiles that have not been updated in the last

You have control over what is permanently deleted:

- Name and address only
- Name, address, and relationships
- Name, address, relationships and custom fields
- Name, address, relationships, custom fields, and remove from work etc. records
- Name, address, relationships, custom fields and remove from work etc records. Records where they are the only client listed will also be deleted
- Name, address, relationships, custom fields and delete any work etc. records completely that they are listed on

Work etc. means work, referral, outcome, communication, evaluation, staff module items and grants.

Once you have specified what you want to delete click the Next button and you will be taken to a second screen.

Stage two

On the next screen, you will see a list of names of the profiles that fit the description you have specified.

¹ It will take 28 days for the data to clear our back-ups but this is not a reversible process. Please see our back-ups information sheet for more information.

Select the names of the profiles that you would like to permanently delete by ticking the boxes next to them.

Select the types of data that you would like to delete from the profiles – this could be in order to pseudonymise the profile or to completely remove the data from it.

There is a tick box to confirm that you wish to proceed to delete the data. Tick this box when you are ready and have double checked everything.

Matching profiles

 John Smith (ID: 31, most recently altered 22/03/2017)

What data do you want to delete

- Name and address only
- Name, address, and relationships
-  Name, address, relationships and custom fields
- Name, address, relationships, custom fields, and remove from work etc. records
- Name, address, relationships, custom fields and remove from work etc. records. Work etc. records where they are the only Client listed will also be deleted
- Name, address, relationships, custom fields and delete any work etc. records completely that they are listed on

work etc means work, referral, outies, communication, evals, staff module items, and grants

 Please tick here to confirm that you wish to permanently delete these profiles. Once you do this and click the "DELETE FOREVER" there will be NO WAY for them to be restored. Please double-check the profiles you have selected.

 delete forever

Once you have clicked the 'delete forever' button, the data will be gone. This process is not reversible. Please be very sure you would like that data to be erased.