



Privacy notice for patients, clients and service users

If you are an employee or representative (or applying to become one), a supporter, or other external party, we have created a specific Privacy Policy which is available on our website: <https://www.nottshospice.org/privacy-policy/>.

Your privacy dashboard

Here is a short summary of how we process and protect your data and respect your privacy.

<p>Types of data we collect</p> <ul style="list-style-type: none"> • Contact details. • Information about how we support you. • Financial information. • Data that identifies you and other people. • Data on how you use our services. 	<p>When and how we collect it</p> <p>We collect data from people using our services, enquiring about our services, engaging with or charitable activity, browsing our website, or chatting to us online, social media or on the phone.</p> <p>Sometimes you provide us with data, sometimes data about you is collected automatically, or provided to us by another organisation.</p>
<p>How we use it</p> <ul style="list-style-type: none"> • To provide services, support or information. • To respond to your enquiries. • To comply with our legal obligations. • For administration purposes. • For internal management. • To analyse and improve our services. 	<p>Third Parties who process your data</p> <p>The following are some of the services that help us keep our organisation and support services running by storing or processing your data:</p> <ul style="list-style-type: none"> • Infrastructure: Microsoft. • Communications: Microsoft. • Healthcare partners: SystemOne. • Sector specialist Partners: Izuka.
<p>Know your rights</p> <p>Your rights include:</p> <ul style="list-style-type: none"> • Accessing information we hold on you. • Having your data corrected. • Opting out of marketing communications. • Porting your data to another service. • Being forgotten by us. • Complaining about us. 	<p>We use cookies</p> <p>We use necessary cookies to run and improve the service to you on our website.</p> <p>Our third-party service providers use cookies too, which they control.</p> <p>You can turn off cookies, but this will mean, for example, that we can't</p>

recognise you online or resolve issues as efficiently.

Any questions about your personal information or this policy should be directed to our registered office at 384 Woodborough Road, Nottingham, NG3 4JF.

Privacy Notice

We are Nottinghamshire Hospice. We are a data controller in respect of information you provide to us (i.e. the organisation making decisions about how and why your personal information is used). Depending on the services we provide to you, there may be occasions when we act as a data processor for your information, this is likely to be where your information has been shared in order to provide support or care for you.

If you are a patient, client or service user, this Privacy Notice applies to you.

The purpose of this policy is to give you a clear explanation about how we collect and use the personal information you provide to us, whether online, via phone, email, in letters, in any other correspondence, or from third parties. We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information.

Depending on the services we provide to you, there may be occasions when we act as a data processor for your information, this is likely to be where your information has been shared with us in order to provide support or care for you. In these cases the leading organisation in your care will be the data controller and their privacy notice will contain further information on how they process our information.

Processing your information in accordance with the law means:

- Being fair and transparent with you.
- Clearly identifying our purpose for processing your information, and checking any additional purpose is compatible with data protection legislation. We document these purposes and periodically review these purposes.
- Making sure that the information we process is adequate, relevant and limited to what is necessary for the purpose of processing your information.
- We take all reasonable steps to make sure the information we hold and process is accurate - and where information is incorrect take remedial action to correct this.
- We do not keep information for longer than is required, identify personal information we no longer need and erase or anonymise information where appropriate.
- Ensuring that we have appropriate technical security measures in place to maintain the integrity and confidentiality of your information.
- It is Nottinghamshire Hospice's responsibility to demonstrate our compliance with data protection legislation.

How we get the personal information and why we have it

We collect and process your data for different reasons in different circumstances, but we'll only collect and process your data where we have a legal basis for doing so. Our purposes and legal basis for using each type of data are set out below.

Personal data may be provided to us by you directly, or it may be provided to us from other sources, and we have shared below a variety of examples of when and why we process personal information. This list is not exhaustive, and due to the nature of our services, there may be times when new categories of personal information may be shared with us for new and evolving reasons. As a result, we keep this policy under constant review.

- To provide you with the care services, support or information you have requested from us - and to ensure it is coordinated and of a high standard.
- To manage our referrals such as where you made a self-referral, when a carer has referred you, or we receive a clinical referral.
- To manage and audit our services, including both local, regional and national audits e.g. CQC audits.
- To investigate queries, incidents, complaints or legal claims.
- To protect our Hospice, patients, staff and visitors from crime and misconduct.
- Assessing your condition against a set of risk criteria to ensure you are receiving the best possible care.
- Preparing statistics on our performance for NHS commissioners, the Care Quality Commission, and other regulatory bodies and partners.
- Helping train staff and support research.
- Supporting the funding of your care.
- To conduct patient, family and friends surveys.
- To help us identify and drive quality improvements within our services.
- To comply with our legal obligations as a Charity and Healthcare organisation.
- For internal administrative and management purposes, such as record keeping of enquiries, feedback or complaints.
- Where collecting and holding your information is required or authorised by law;
- For health and social care research, and planning purposes.
- Other specific purposes that you may agree to from time to time.

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for our processing this information are:

- **Your consent.** Where consent has been given, you are able to remove your consent at any time. You can do this by contacting us.
- **We have a contractual obligation.** For example, where the processing is necessary for the performance of a contract to which you are a party, or to take steps prior to entering into a contract with you.

- **We have a legal obligation.** For example, where processing is necessary in order for us to meet our requirements under the Safeguarding legislation, to provide information to law enforcement organisations or the Courts, or we are legally required hold patient information for audit purposes.
- **We have a legitimate interest.** For example, where it is necessary for the purposes of our legitimate interests, except where our interests are overridden by the interests, rights or freedoms of affected individuals (such as you).

When we process your personal information in this way, we also consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your information for activities where our interests are overridden by the impact on you, for example where collection and use of your information would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law). Examples of processing based on the legitimate interest grounds are:

- Measure and understand how our services are used.
- The use of CCTV recording equipment in and around our premises or events for monitoring and security purposes.

To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of your personal data, the nature of the personal data, and the impact of the processing on you.

For the sensitive data we process, the lawful basis we rely on for this processing include:

- Public interest, and for the provision of health and social care services – to deliver and manage our care and support services, which are partially funded through our contract with the NHS.
- Public interest, and for archiving, research and statistical purposes – to perform research using health and social care data.
- Explicit consent.
- Legal obligation – to manage your personal records in line with the NHS Records Management Code of Practice and data protection legislation.

Or on rarer occasions:

- Where we need to protect your vital interests (or someone else's interests); and/or,
- Where it is needed in the public interest or for official purposes.

The type of personal information we collect

To be able to provide you with services and support from Nottinghamshire Hospice, we must process your personal data. The type of personal data we collect depends on the way you interact and use the Nottinghamshire Hospice services. For

example, accessing services as a Nottinghamshire Hospice patient will be a different experience than interacting with us as a donor.

As a patient, we may collect the personal data from you, your family, friends and carers, and other health and social care providers (for example your GP, hospital, community teams and Local Authorities).

We currently collect and process the following information:

- Identity Data: your first and last names.
- Contact Data: your address, telephone number, and email address.
- Individual Identifiers (such as your NHS Number).
- Information about how you use our services and the support we have provided to you.
- Care records including information about your family members, carers, next of kin, and friends who may support or care for you.
- Information relating to your identity where we are required by law to collect this to comply with regulations - such as Safeguarding and Health and Safety.
- Your communications with us, including a record of the email correspondence created when you contact us.
- Information on how to safely access your home (for in-home care).
- Information relating to specific legal arrangements such as Lasting Power of Attorney.

Special Categories of Personal Data

Some categories of personal information are regarded by the law as more sensitive than others. This is known as 'special category' or 'sensitive personal data' and covers things like information about your health, ethnic origin, religious beliefs, political opinions or any genetic or biometric data that is used to identify you.

As a patient in our care, sensitive information will be processed by our teams in order to ensure we can provide you the best quality of care and support. We may also process this type of information for monitoring equal opportunities, managing health and safety obligations and managing our safeguarding obligations, among other reasons. The information you choose to share with us may consist of special category personal data, comprising details of any disability or other health information you wish to share with us.

We will always make it clear when we collect this information from you what sensitive personal data we are collecting and why.

We may process the following sensitive personal data:

- Medical information including physical health or mental condition e.g., medications, previous treatments, diagnosis, test results, records of intimate care and other personal information given by the individual or other health and social care organisations.
- Data revealing your racial or ethnic origin.

- Data concerning your sex life.
- Data concerning your sexual orientation.
- Genetic data (for example, details about a DNA sample taken from you as part of a genetic clinical service).
- Data revealing religious or philosophical beliefs.
- Data relating to criminal or suspected criminal offences.

Information sharing

Where necessary, and in accordance with data protection legislation, we share information internally within Nottinghamshire Hospice and with third parties. This is as required and where we have a legal basis to do so.

We share information where there is a legal, regulatory or professional obligation to disclose your personal information, in order to apply the relevant rules and/or to protect the rights or safety of our employees past and present.

We may also be required to share information with Statutory and Regulatory authorities, law enforcement agencies and courts, or in the event of a transfer or acquisition of all or part of our organisation.

Sometimes we might share your data with third parties. This could include:

- Engaging third-party service providers to perform a variety of business operations on our behalf. For example, service providers we use for specific purposes, such as for our IT systems, legal counsel for the provision of legal advice and guidance.
- Third parties for whom we supply service. For example, the Local Authority, or the ICB, for whom we provide services on behalf of.
- Regulatory authorities, law enforcement agencies and courts.
- In the event of a sale of all or part of our organisation, the buyer and its professional advisers.
- If we have a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation. This may be to protect the rights, property, or safety of our company, our clients, employees, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Health and Social Care Data Sharing

We may share your personal data with NHS organisations, non-NHS organisations and Local Authorities who are involved in providing health and social care to you. By sharing data in this way, we are able to work as multi-disciplinary teams to ensure that your health and social care needs are being met, and you don't need to repeat the same information to different providers. Examples of organisations that we routinely share data with are:

- NHS England e.g. as providers of your electronic health care record held on SystemOne,
- The NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) and other NHS agencies, and their sub-contractors. For example;
 - Your GP.
 - Community nursing teams.
 - East Midlands Ambulance Service.
 - City Care.
- Research organisations (e.g. Universities) – but where this happens, data is anonymised

We may also share your data with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998.
- If there is a public health need such as preventing the spread of infectious diseases.
- If we receive a formal order from a court acting in their judiciary capacity.
- If there is a safeguarding need (vulnerable adults or children).
- If we receive a request from an organisation with statutory investigative powers, for example, the Care Quality Commission, the General Medical Council (and other professional bodies), the National Audit Office or the Health Service Ombudsman.

Third party (sub-processor) organisations

For our general day to day data processing activities, we use third party organisations or systems to help us administer, deliver and monitor the services we provide:

- For the provision of IT and software services (e.g. Microsoft who provide our office software) to enable the management of the charity and office administration.
- For financial transactions and accounting.
- For occupational health support provision.
- To help us improve our organisation.
- For the administration of our website and online platforms.
- For any legal and regulatory guidance in the provision of our services.

Access to your personal information is only allowed when required by the law, or is required as part of fulfilling our service obligations. We do not, and will never, sell your personal information to other third parties.

International transfers

Where we have partners and service providers based outside of the UK (e.g. Microsoft for our IT Services), your personal data may be accessed or otherwise processed in other countries. We have implemented measures and safeguards to ensure that any transfer of data is compliant with our data protection laws.

For example, we ensure that Standard Contractual Clauses or International Data Transfer Agreements are approved by the Information Commissioners Office (ICO) and the UK Government and/or European Commission. We also carry out a detailed assessment to ensure the companies receiving your data can comply with these Clauses. Please contact us if you wish to know more.

Keeping your information safe and secure.

We are committed to keeping personal information secure to protect it from being inappropriately or accidentally accessed, used, shared or destroyed - and against it being lost. We take organisational measures to keep information secure and provide regular training for staff on data protection. We endeavour to ensure that our suppliers take similar steps to keep your data secure.

How long we keep your data

We will only keep your information for as long as necessary to perform our obligations and to fulfil the original processing purpose. Based on the legal basis we may need to keep some information for longer i.e., to comply with tax and accounting law and in some cases, we will anonymise your information so that it can no longer be associated with you.

When establishing our Retention Schedule we consider the legal basis, sensitivity of information, the type of information and - once the retention period has ended - how we deal with the information.

Keeping your data correct

We are committed to keeping your information up to date. If you believe that we have made an error, then please contact us as we have outlined below, and we will use reasonable endeavours to carry out a correction.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access.** You have the right to ask us for copies of your personal information.
- **Your right to rectification.** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- **Your right to erasure.** In certain circumstances you have the right to ask us to erase your personal information.
- **Your right to restriction of processing.** In certain circumstances you have the right to ask us to restrict the processing of your personal information.
- **Your right to object to processing.** In certain circumstances you have the right to object to the processing of your personal information.
- **Your right to data portability.** In certain circumstances you have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your rights in relation to automated decision making and profiling.** As a matter of principle, you have the right not to be subject to a decision based solely on automated processing, including profiling. However, we may automate such a decision if it is necessary for the entering into - or performance of - a contract between us, authorised by law or regulation, or if you have given your explicit consent. However, we do not currently make any decisions by automated means.

You are not usually required to pay any charge for exercising your rights. If you make a request, we have a calendar month to respond to you.

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may charge a reasonable fee which takes into account the administrative costs of providing information, or we may also refuse to provide the information. Where we refuse a request, we will explain our reasons for the refusal and remind you of your right to complain.

If you would like further information on your rights or wish to exercise them, please email info@nottshospice.org or write to: Nottinghamshire Hospice, 384 Woodborough Road, Nottingham, NG3 4JF.

Who to contact should you wish to make a request, ask a question or complain

You can contact us in the following ways:

- Email info@nottshospice.org
- Telephone [0115 910 1008](tel:0115 910 1008), or
- Write to us at our registered office (set out above).

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at:

Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk/make-a-complaint/

Changes to this policy

We'll amend this privacy policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. Please check back regularly to see if there have been any updates.

This Privacy Policy was last updated in October 2024.