

Overgate Hospice Privacy Notice

Thank you for supporting Overgate Hospice and Overgate Hospice Support Ltd you are helping us provide vital care for people in Calderdale. Overgate Hospice is committed to protecting the privacy of everyone who uses our services: as patients and carers or as employees and volunteers; and that of anyone who supports our work throughout fundraising, retail or lottery activities. This statement explains what personal data we collect and process, how we collect it, whom we share it with, and why we do so. It also explains the steps we take to keep data secure. If you have any questions about this privacy statement or our privacy and data processing in general, please contact Laura Golding (Director of Income Generation), or for issues relating to patient privacy, please contact Mrs Tracey Wilcocks (Director of Clinical Services) or Dr Rachel Sheils (Medical Director). You can contact us on 01422 379151, email information@overgatehospice.nhs.uk or write to using at the address above.

The legal basis for the collection and processing of your personal data is that you have given your consent and/or that it is in our legitimate interests to do so in order to support hospice needs in the area and your rights and freedoms are not prejudiced by this.

What is personal data?

By personal data we mean any information that might allow you to be identified, such as your name, address, date of birth, credit card details, photo or video image or voice recording. For patients and carers, personal information would also include information relating to your care, including information about your health and general wellbeing.

Who are we?

We are Overgate Hospice (Charity No. 511619), a charity that supports people with life-limiting illnesses in Calderdale and Overgate Hospice Support Ltd (Company No 07109169) a trading subsidiary raising money for Overgate Hospice. Our registered office address is:

Overgate Hospice, 30 Hullen Edge Road, Elland, HX5 0QY

Overgate Hospice and Overgate Hospice Support Ltd may share data from time to time.

How do we collect personal data from you?

We may collect personal information about you when you take part in one of our fundraising events or challenges, make a donation, play our lottery or raffles, buy items in our shops, apply to work or volunteer with us or use our website. If you are referred to one of our clinical services we will collect data from you. If you have consented, we also access your hospital and general practice medical records etc, so that we can give you the best care.

What type of information is collected about you?

Fundraising, visiting our shops, and playing our lottery

The personal information we collect about you for the purposes of our fundraising, lottery and retail activities might include your name, address, email, phone number, date of birth, photo or video image and financial information that allows you to make a donation or pay for goods/events etc (e.g. debit card details). You may appear in still images or video footage using Closed Circuit Television (CCTV) that is used on some hospice sites for security purposes and during filming at some of our fundraising events.

Volunteering with us

If you volunteer with us we will collect your name, contact details including next of kin details and any health problems. You may appear on Closed Circuit Television (CCTV) images on some hospice sites, and in some photographs of events. If we want to take a photograph of you specifically, we will get your consent for this.

Working for us

If you apply for or take a job with us, we will store your application form and related information, including references etc from previous employers. We collect information about you for the purposes of ensuring equality in our employment processes.

For employees, we store contact information, bank details, and keep records of your employment history. You may appear in still images or video footage using Closed Circuit Television (CCTV) that is used on some hospice sites for security purposes.

We also store information about you that we might need to use in an emergency (e.g. next of kin details, medical conditions that we might need to know about in an emergency etc).

If you are a patient

If you use our clinical services we will need to collect information such as your name, age, address, gender, and possibly sensitive personal information concerning your health and

wellbeing. So that we can ensure we are offering our services equitably, we collect information about your ethnic origin, sexual orientation, and religion. In order to provide complete care we may also collect some information about family members and carers. If you stay on or visit our premises, such as our Inpatient Unit, we may collect your image on CCTV.

To ensure that we offer the best care, we use your information to conduct audit and service evaluation. This would include surveys of your experience and satisfaction. Once the information was analysed, and the results were shared, no-one else would be able link that information to you.

With your permission we would also use your contact information to keep you informed about services that we offer, and about ways that you could support the work of the hospice.

If you are someone named by the patient as a carer/contact

If a patient has named you as the person they would like us to contact about their care, we would store your name, address, and phone numbers, for the purpose of contacting you about the patient's care.

If you consented, we will also use your information so that we can keep you informed about events for carers, and ways that you could support the work of the hospice.

Using our website

If you use our website, the system will automatically store data about the timings of your visits, and a record of which pages you looked at.

Use of 'cookies'

Like many other websites, the Overgate Hospice website uses 'cookies'. Cookies are small files stored on your computer that allow websites to recognise you when you visit. They store data about your browsing history but will not identify you as an individual. This helps us to improve our website and deliver a better more personalised service.

You can switch off cookies in your browser preferences but doing so may result in a loss of functionality when using our website.

By using our website and services you agree to be bound by the terms of this statement.

Links to other websites

Overgate Hospice website may include links to other sites, not owned or managed by us. We cannot be held responsible for the privacy of information collected by website not managed by us.

Overgate Hospice uses information to care for patients and their families/carers. This information is kept securely in clinical computer systems administered by our partner organisations (at CHFT and The Health Informatics Service, and national NHS teams that hosts patients' GP records). Technical steps will be put in place by these partners to protect the data of patients who choose to Opt-Out of allowing their information to be used automatically for research and planning by the NHS. However, the government has waived the right to the Data Opt-Out during the Covid crisis.

If you wish to Opt-out of the data sharing scheme, you can do so via your GP or you can do it directly online at <https://www.nhs.uk/your-nhs-data-matters/manage-your-choice/> by September 30th 2021.

We work in partnership with Calderdale & Huddersfield Foundation Trust who provide the computer systems that we use for patient care. You can read their privacy notice here: <https://www.cht.nhs.uk/patients-visitors/privacy-notice/hospital-policy>

How we use your information

We may use your information for any of the following depending on our relationship with you.

For our fundraising, retail and lottery services we may collect data in order to provide you with information about Hospice developments, process a donation you have made, to send you newsletters and other communications about our work or to allow you to take part in events.

We may occasionally use profiling to identify potential donors and help us better understand our current donors. Such information is compiled using information you have provided. We carry out research such as this in order to better understand donor motivations and preferences, with the aim of greater engagement with our supporters.

We always seek to ensure that any research or profiling is done in a way that does not unreasonably or unexpectedly intrude on an individual's privacy. We also endeavour to make sure that in accordance with fair and lawful processing requirements under current legislation, individuals are made aware of the purposes for which we may collect and process their personal data at the earliest reasonable opportunity.

We respect your rights of privacy and are happy to provide further information about any profile details that we may hold about you in accordance with your data subject access rights under current legislation.

In accordance with those rights, you may also at any time request that we update, correct or delete any Profile information that we may hold about you and/or no longer use it for direct marketing or fundraising purposes.

We collect personal data about job applicants and employees for administrative purposes and in order to comply with employment and safeguarding legislation, such as referrals to the Disclosure and Barring Service.

We collect personal data from our volunteers for administrative purposes and to comply with safeguarding legislation, such as referrals to the Disclosure and Barring Service.

When we collect data from patients and their families and carers, we do so in order to provide care to them and protect their wellbeing. We also collect and store it for the purposes of audit, quality control, and incident reporting.

In most cases, we will only have personal data that you provide to us, but if you use fundraising services such as Just Giving or social media (for example, Facebook), they may share information about you with us if you allow them to do so.

How long do we keep your data?

Patients and carers – paper records of your care and details are usually retained for 8 years after the death of a patient. However some records must be kept for 30 year (e.g patients who have received a blood transfusion while in our care, or patients who donate their corneas after they die.) After this time, paper records are securely destroyed. At present, electronic patient records are not destroyed (e.g. the record that your GP uses, and sometimes shares with the hospice.) It is important to know that you have the right to have factually incorrect information about you corrected in all your records. Unless it is necessary for public safety, you have the right to decide which professionals your information is shared with. Patients' records are stored on site during their lives but moved to secure off-site storage after death.

We use the Records Management Code of Practice for Health and Social Care 2016 (which can be read at <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>)

Donors and Supporters – we will store details of any financial donations you have made for 7 years, at the end of each tax year this information will be stored at a secure off site location.

Staff and volunteers – there are various retention periods for different types of information. We use the Records Management Code of Practice for Health and Social Care 2016 (which can be read at <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>)

Who has access to your information?

We will never sell or swap your details with third parties. We may share data you provide with, our regulators, and with law enforcement authorities. We may share patient data with other healthcare providers with the patient's consent. We may sometimes also be legally required to share it with local authorities and our regulator, the Care Quality Commission.

Your consent is important

For direct marketing communications we collect email data with your explicit consent, which you may withdraw at any time and use an opt out system for mail consent again you can withdraw at any time.

Email Example:

Under collection of the email address:

By providing your email address above you understand that we may email you relating this and future hospices events and developments. In order for us to communicate with you by email your name and email address will be passed to an external email provider who will act on our behalf. No other details will be passed on and your information will not be used to contact you for any other purpose.

We share your email data with an external email provider called Mail Chimp but your data will not be used for any other purpose or passed on.

Mail Example:

We would like to keep you updated about how your support helps Overgate Hospice. We will only contact you about our key achievements, events and how we are making a difference to the lives of local people with life limiting illnesses. We appreciate that some

people may choose not to hear from us again. If this is the case, please tick here Box to opt out of all marketing communications by post from Overgate Hospice in the future.

You can change your emailing and mailing preferences at any time by emailing fundraising@overgatehospice.nhs.uk or calling 01422 387121. You can see our full privacy notice on our website.

Accessing and updating your information

The right of access – you have the right to access your personal data and supplementary information. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them. You may request the data in printed or electronic format but we will discuss this with you at the time. Requests for Access can be made in writing or via email using the contact details below.

We care about the accuracy of the information we hold about you. If you believe any information about you is incorrect or out of date, please contact us.

Fundraising, Retail and Lottery: 01422 387121 or email fundraising@overgatehospice.nhs.uk

Volunteering: 01422 379151 or email info@overgatehospice.nhs.uk

Patients: Clinical Administration Team 01422 379151 or email info@overgatehospice.nhs.uk

Your Rights

Under the GDPR you have a number of legal rights with regard to your personal information:

- The right to be informed – you have the right to be informed about how we collect and use your personal data
- The right to rectification – you have the right to have inaccurate personal data rectified, or completed if it is incomplete
- The right to erasure - you have a right to have your personal data erased (this is also known as the right to be forgotten). This right is not absolute and only applies in certain circumstances
- The right to restrict processing - you have the right to request the restriction or suppression of your personal data. This right is not an absolute and only applies in certain circumstances.

- The right to data portability – you have the right to obtain and reuse your personal data for your own purposes across different services
- The right to object – you can object to: processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics
- Rights in relation to automated decision making and profiling – you have the right to object to the your personal data being used for automated individual decision-making and profiling

If we do hold personal information about you and you have any questions about the data we hold, or wish to raise an objection, please contact our Clinical Administration Team on 01422 379151.

You are advised by the Information Commissioner's Office to follow up any verbal request in writing because this will allow you to explain your concern, give evidence and state your desired solution. You can find more information at <https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/>

Security

At Overgate Hospice we take your security and privacy seriously. When we collect your personal information we use a variety of technical processes to prevent unauthorised access including firewalls, and encryption.

Any sensitive information you send to us (such as credit card details) will be encrypted. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

If you're 16 or under

In some circumstances we may need to know if you are aged 16 or under and may refuse certain services, products or events unless we have your parent/guardian's permission.

Your right to lodge a complaint with a supervisory authority

If you believe that we breached your privacy in any way, we urge you in the first instance to contact

Clinical: Tracey Wilcocks, 01422 379151, Tracey.wilcocks@overgatehospice.nhs.uk

Non Clinical: Laura Golding. 01422 387121 laura.golding@overgatehospice.nhs.uk

Changes to this policy

We may amend our privacy policy from time to time, so please check back every so often for updates.

This policy was last updated 24.04.2019