

HUMAN RESOURCE POLICY

Document No: HR Pol 35

TITLE	Privacy Policy
SUMMARY	This document provides guidance to managers, clinicians and others about how Teesside Hospice processes the information we hold about patients, staff, volunteers, supporters, relatives & visitors within Teesside Hospice Care Foundation & Teesside Hospice Trading Limited.
	All Managers and Staff throughout Teesside Hospice Care Foundation and Teesside Hospice Trading Limited (henceforth Teesside Hospice) are required to instigate action to ensure the successful implementation of this policy within their area of control.
APPROVED VIA	Workforce Development Committee
DISTRIBUTION	For distribution to all areas via Teesside Hospice Admin Department
RELATED DOCUMENTS	 HR POL 2 Records Management Policy HR POL 7 NHS Smartcard Registration Policy HR POL 21 IT Policy R PRO 6 Incident Reporting Procedure
AUTHOR(S) / FURTHER INFORMATION	Data Protection & Information Governance Lead, Head or Workforce Development, and Director of Nursing and Quality
OTHER INFORMATION	

ISSUED BY: Chief Executive

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Addendum (2) - Coronavirus (Covid-19) Asymptomatic Testing Supplementary Privacy Notice

(Added 18/05/2021)

1. Definitions

A "Privacy notice" is a statement issued by an organisation which explains how personal and confidential information about individual is collected, used and shared. This may also be called a privacy statement, fair processing statement or privacy policy.

2. Introduction

These Privacy notices demonstrate Teesside Hospice's commitment of openness and accountability to ensure that we process personal information/data fairly and lawfully in accordance with General Data Protection Regulation (EU) 2016/679 (GDPR)

3. Scope

This policy applies to all members of staff who process information, that are directly employed by Teesside Hospice and for whom Teesside Hospice has a legal responsibility. For those staff also covered by a letter of authority/honorary contract the organisations policies are also applicable whilst undertaking duties on behalf of Teesside Hospice. Further, this policy applies to all third parties and others authorised to undertake work on behalf of Teesside Hospice.

Please read in conjunction with HR Pol 2 Records Management Policy Appendix 1 Confidentiality Guidelines, HR Pol 21 IT Policy Appendix 3 HSCIC guidance for reporting, managing and investigating information governance and cyber security serious incidents requiring and investigation and R Pro 6 Incident Reporting.

4. Responsibilities

All staff are required to maintain as confidential any information relating to the business of the organisation, its users and staff that they obtain through their connection with Teesside Hospice.

Roles	Responsibilities	
Chief Executive	Has overall responsibility for the control and processing of information in Teesside Hospice. They are responsible for the security and safe keeping of non-clinical information i.e.	
	personnel, financial and business records.	
Director of Nursing and	is responsible for ensuring that:	
Quality (DNQ)		

	Patients/clients are made aware of their rights in relation to		
	their information.		
	The integrity of the security and destruction systems in place		
	protects patient/client confidentiality at all times.		
	The content of the privacy policy are in line with statutory		
	requirements and professional guidance.		
Caldicott Guardian	A Caldicott Guardian is a senior person responsible for protecting		
(Associate Specialist)	the confidentiality of people's health and care information and		
	making sure it is used properly.		
Senior Information Risk	Will oversee compliance with the GDPR / DPA and the		
Owner (SIRO) - CEO	development of appropriate policy and procedure. The SIRO is		
	responsible for ensuring any suspected breach is investigated and		
	appropriate actions taken, and for managing information risk.		
Data Protection &	Is to inform and advise Teesside Hospice and its staff about their		
Information Governance	obligations to comply with the GDPR / DPA and other data		
Lead	protection laws. They are required to monitor compliance with the		
	GDPR and other data protection laws, including managing		
	,		
	internal data protection activities, advise on data protection		
	impact assessments: train staff and conduct internal audits. In		
	addition, they are required to be the first point of contact for		
	supervisory authorities and for individuals whose data is processed		
	(employees, customers etc.)		
Clinical Leaders/Heads of	Are responsible for:		
Departments	Ensuring compliance with this policy and for the security of		
	personal information within their department.		
	 Ensuring staff are aware of this policy and how to apply them. 		
	Restricting access to the stored paper / electronic		
	healthcare records, to authorised staff only, based on clinical		
	need		
	Ensuring that record storage areas are kept locked at all		
	times and that access to keys is restricted to authorised		
	staff.		
	Ensuring that electronic healthcare records on computers		
	are locked away when not in use, staff have shutdown		
	SystmOne application and removed Smartcards from		
	device readers.		

	Ensuring that a master/duplicate key for the paper record	
	storage areas is retained in the master/duplicate key	
	cupboard in the general office under restricted access.	
Administrative staff	Are responsible for:	
	 All aspects of electronic patient data including restricted access through a system of password/Smartcard PIN protection. Paper documentation, creation of new patient records, the storage of patient records on completion of an episode of care, the correct identification and storage of deceased patient records and the security of these at all times. Electronic documentation, registering of patients on SystmOne, scanning of information into the patient record, deducting patient's records on completion of an episode of care. 	
Staff	Are responsible for:	
	 Managing information accurately, fairly, legally and securely and processing it only for the purposes for which it was obtained. Staff must follow this policy and their professional code relating to documentation and patient record keeping; protecting patient confidentiality in all forms written, verbal and electronic format at all times and in all places within Teesside Hospice and beyond. 	

5. Our main privacy notices

Teesside Hospice has 4 main privacy notices:

- Our patients and service users: this notice covers the information we hold about our patients and other individuals who may use our services. (Appendix 1)
- Our staff: this notice is in relation to information we collect about staff as part of our responsibility as an employer. For the purposes of this privacy notice, "staff" includes applicants, employees, other workers (including bank and contracted staff), volunteers, trainees and those carrying out work experience. (Appendix 2)

- Relatives and visitors: this notice covers the information we hold about relatives and visitors. (Appendix 3)
- Supporters: this notice is in relation to information we collect about individuals who engage with our charity this could be through making a donation of money or goods, using the charity website, participating in our events or choosing to support us in any way. https://teessidehospice.org/cookie-and-privacy-policy. (Appendix 4)

APPENDIX 1

Patient Privacy notice

About Us

Teesside Hospice is a registered charity (charity no. 512875) and a company limited by guarantee (registered in England no. 01642201) based at 1 Northgate Road, Linthorpe, Middlesbrough, TS5

5NW.

Teesside Hospice Trading Company Ltd is a wholly owned subsidiary company (registered in

England no. 02265205) which trades on Teesside Hospice's behalf for the sole purpose of raising

funds for the hospice.

Teesside Hospice believes that nobody should have to face a life limiting illness alone and that's why

we are here to offer support every step of the way. We help local people with cancer, heart disease,

Parkinson's disease, Motor Neurone disease or a respiratory disease, or any other life limiting illness

get the care they deserve at the time when they need it most.

Care, compassion, dignity and choice is at the heart of everything we do. Our aim is to reach and

improve the lives of as many local people as possible living with cancer and any other life limiting

illnesses.

For more information please see our website: https://teessidehospice.org

This privacy notice explains how we use and share your information.

We are committed to protecting your privacy so we make sure we protect any personal information

you give us. If you have any questions or concerns about how we handle your information please

contact our Data Protection Lead on 01642 811062.

How we keep your personal information safe and secure

Personal data means any information about an individual from which that person can be identified.

It does not include data which has been anonymised, such that a person's identify has been removed.

We take our duty to protect your personal information and confidentiality very seriously and we are

committed to complying with all relevant legislation and take all reasonable steps to ensure the

confidentiality and security of personal data for which we are responsible, whether electronic or

paper. All staff receive mandatory training in handling personal data. All computers are password

protected and your electronic record SystmOne can only be accessed by approved staff with an

Date Reviewed 4th November 2021

NHS Smartcard (Chip & Pin). The information you provide will only be seen, accessed or shared by those staff involved in your care.

Purpose and Legal basis for the processing of your data

If you are referred to Teesside Hospice's clinical services, the purpose of collecting your personal and sensitive health information is to provide you with appropriate and safe healthcare. We may ask for additional information for the purposes of audit or research. We have a legal obligation to maintain healthcare records in accordance with the health and Social Care Act 2008, Regulations 2014 or Regulations 17 and as such, we need to capture information about you and your care to provide you with safe and effective treatment.

Sharing your information.

Teesside Hospice shares information about you with others directly involved in your care. Everyone working in Teesside Hospice has a legal duty to keep your information about your confidential. Similarly, anyone who receives information from us also has a legal duty to keep it confidential.

Information stored on your Electronic Healthcare Record (SystmOne) may be shared externally with other professionals which may be involved in your direct care, e.g. GP's, District Nurses, Community Palliative Care teams, Ambulance service, Out of Hours services, and social care services. The sharing of this information means that everyone caring for you is fully informed about your medical history, including medication and allergies and improves communication and the coordination of services and care based on your individual needs.

When you attend Teesside Hospice you will be asked for your consent to share the information in/out.

- SHARING IN Do you consent for Teesside Hospice to view information recorded by other SystmOne services involved in your care?
- SHARING OUT Do you consent for your information recorded at Teesside Hospice to be seen by other SystmOne services involved in your care?

YOUR RIGHTS – At any time YOU CAN refuse/withdraw consent, in full or in part to sharing your record.

We will not disclose your information to any other third parties without your consent unless there are exceptional circumstances, such as if the health and safety of other is at risk or if the law requires us to pass on the information.

We will also share some of your details with companies who will need it, in order to provide appropriate medical or other equipment to you. For example, home oxygen suppliers and compression garment manufacturers.

Additional consent will be sought for any other activities outside of these purposes, such as digital photography. We may also ask your consent to use any photographs for marketing purposes and this will be done very explicitly, no photographs or data will be used for this purpose without your consent.

As clinical, fundraising and human resources information is collected for different purposes, we do not pass information between the different systems within Teesside Hospice in order to protect your confidentiality unless you have given your consent for us to do so. The only exception to this is when a patient dies we will inform the Fundraising team to ensure that any supporters who have died while receiving care with Teesside Hospice are not contacted inappropriately causing distress to the family.

What information do we collect?

The types of personal data that we collect and process include

- Your name, date of birth, address, email address, contact numbers, NHS numbers, next of kin and emergency contact details etc.
- Visitors log

Sensitive personal data (Special Category) The sensitive personal information we hold about you may include the following:

- Details about your Race and/or Ethnicity.
- Details about your language preferences.
- Details about your religious or other beliefs.
- Details of your current or former physical or mental health care. This may include information about any health care you have received or need, including about clinic and hospital visits and medicines administered.
- Details of services you have received from us.
- Information relevant to your continued care from other people who care for you or know you well, such as other health professionals and relatives.
- Details concerning your sexual orientation.
- Details of any relevant genetic data or biometric data relating to you.

Sources of information.

Your information may come directly from you, a loved one, family member or other legal guardian. Other information about you in relation to your health or that is required to enable us to provide you with healthcare may be provided directly or indirectly from your GP, health professional or from the NHS.

How your personal information is used?

Your records are used to provide you with high quality, safe and effective patient care and to enable us to work effectively with other professionals that are providing you healthcare within our Inpatient unit, Wellbeing Service, Lymphoedema, Counselling and Out-Patient Clinics and through our Outreach team within your own home.

Teesside Hospice uses your contact details to communicate with you about your healthcare and appointments in the form of letters, voice messages (telephone & mobile), by text message or email. We also need to know who to contact in the event of an emergency. However, you do have the right to say "no" to our use of your information but this could have an impact on our ability to provide you with care.

Keeping your information up-to-date

It is essential that the details we have are accurate and up to date. Always check that your personal details are correct and inform us of any changes as soon as possible so that we can update your personal information.

How do we store your information?

The confidentiality of your medical information is of paramount importance to us, therefore we make every effort to prevent unauthorised access to and use of information relating to your current or former physical and mental health. Your information is primarily stored on the Electronic Patient Record – SystmOne. We may, however, also hold some information in a paper record (medication charts / Counselling records) and within Teesside Hospice's secure databases..

How long will we keep your personal information?

We will keep your clinical record for 8 years after your discharge from the service, or for 25 years if you are a child using our service. Your notes may be kept for longer in very particular circumstances such as involvement in a clinical trial but in these instances specific consent would be obtained.

We may from time to time offer you the opportunity to become involved with research projects linked to Teesside Hospice, in these circumstances your direct consent will be obtained and the care of your data outlined as part of the project as it may differ from project to project.

The NHS has launched a National Data opt-out scheme by which you can opt out of your data being used for research or planning purposes. Additional information can be found at: https://www.nhs.uk/your-nhs-data-matters/

You also have the right to:

- Fair Processing know what personal information of yours is being processed, the lawful basis, who is processing your information, the purpose of processing and how long your information is stored for.
- To object To restrict how and with whom we share information in your record that identifies you.
- Rectification of your personal information to rectify inaccurate personal data.
- To be forgotten / erasure
- To restrict the processing of your personal information
- To data portability to request copies of information in a useful format
- To object to automated decision-making and profiling;
- To access to your personal information (Subject Access Request);

Other ways in which we use your information.

We also use information about you to:

- Check the quality of care, such as clinical audit, for training and service improvement
- Help investigate any concerns or complaints you or your family have about your care.
- National & Regional Statutory reporting
- Statistical purposes.
- Ensure that our service can meet patient needs in the future e.g. service development.
- We may also ask you to complete a questionnaire about the care you have received from us.

We use anonymised information wherever possible, but on occasions we may use personal identifiable information for research and auditing. However, this information will only be used with

your explicit consent.

We employ CCTV on our site in order to protect staff, patients, visitors and Teesside Hospice

property, provide a deterrent and provide evidence to take criminal or civil court action and help

provide a safer environment. We will only share these images if required to do so by authorised

bodies, for example the Police who will only use it for crime detection, prevention or investigation.

Images and audio will not be released to the media for entertainment purposes or placed on the

internet for public viewing.

Website - Cookie / IP address use

For information on the use of cookies and IP addresses when you use our website please refer to

the Privacy and Cookie Policy at https://teessidehospice.org

Updates or changes to the Privacy Policy

We reserve the right to make changes to this Privacy Policy. Each time you visit this site you should

check the Privacy Policy to check that no changes have been made to any sections that are

important to you.

Complaints

Teesside Hospice's Data Protection & Information Governance Lead is responsible for ensuring that

Teesside Hospice complies with the GDPR and can be contacted on 01642 811062.

If you have any questions or concerns about this Privacy Policy and our privacy practices or if you

wish to file a complaint, or exercise your rights please contact us by calling 01642 811062.

You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you

believe your data has been processed in a way that does not comply with the GDPR. Teesside

Hospice's Registration Number is Z3418919. You can do so by calling the ICO helpline on 0303

123 1113 or via their website www.ico.gov.uk.

Date Reviewed 4th November 2021

Staff Privacy Notice

About Us

Teesside Hospice Care Foundation is a registered charity (charity no. 512875) and a company limited by guarantee (registered in England no. 01642201) based at 1 Northgate Road, Linthorpe, Middlesbrough, TS5 5NW.

Teesside Hospice Trading Ltd is a wholly owned subsidiary company (registered in England no. 02265205) which trades on Teesside Hospice's behalf with the sole purpose of raising funds for the hospice.

For more information please see our website: https://teessidehospice.org

This privacy notice explains how we process the information we hold about all Teesside Hospice employees. Employees include contracted and bank staff, volunteers, students and staff contracted through hospital trust agreements. We are committed to protecting your privacy and so will only use personal data in accordance with all applicable laws, including the General Data Protection Regulation (GDPR).

If you have any questions or concerns about how we handle your information please contact either our HR Manager or Data Protection Lead on 01642 811062.

How we protect your data to ensure it is kept secure and safe?

We have strict security measures to protect your data which is kept in a secure environment with access restricted to a "need to know" basis.

All staff are required to undertake mandatory data security awareness training which covers how personal information should be processed.

Why we collect information about you?

Teesside Hospice's lawful basis for processing your personal information is for employment purposes, with the aim of meeting our contractual and regulatory obligations and carry out our duties as an employer. The information is processed under Articles 6(1) (b) and 9(2) (h) of the GDPR. This includes processing your pay and pension, processing changes that happen as a result of your career development, providing information for statistical purposes, and ensuring that all health and safety standards are successfully complied with.

As an employee Teesside Hospice does not need to obtain your consent to process your information, the purposes include:

- To process recruitment processes, job enquires and expressions of interest
- To process the details of your contract of employment, pay and pension and keep a record of employment related matters
- To process special categories of data which include:
 - Trade union membership
 - Information about your health, including medical conditions, health and sickness records
 - For the monitoring Race, Ethnic origin, Religion, Sexual orientation, Disability and other protected characteristics.
- For our own internal administrative purposes.
- To keep images that appear in Teesside Hospice publications or websites to market and promote the Hospice
- To keep images for the administration of staff ID badges, NHS Smartcards and notice boards.
- For statistical purposes appropriate to our service.
- To comply with relevant laws and regulations

Please note: This list is not exhaustive and we will update it periodically to reflect any major changes.

What information do we collect?

The types of personal data that we collect and process include

- Personal details name, address, telephone numbers, date of birth, email address
- Personal demographics/equal opportunities monitoring data gender, race ethnicity, sexual orientation, religion.*
- Medical information physical and/or mental health*
- Emergency contact details Next of kin
- Education and Training
- Copies of professional qualifications and registration numbers NMC, GMC etc.
- Employment details job role, place of work, references and proof of eligibility to work in the UK
- Copy of identity documents passport, driving license, birth certificate, recent address proof bill from provider.
- Attendance records annual leave, periods of absence/sickness
- Bank details
- National insurance details
- Pension details
- DBS certificate number and date*
- Offences (including alleged offences), criminal proceedings, outcomes and sentences.*

- Visual images photographs on ID badges, staff notice boards, website, organisation social media or CCTV monitoring
- Information relevant to employee relation matters
- Employment tribunal applications, complaints, accidents and incident details
- Supervision and appraisal documentation
- Complying with Health & Safety, and Safeguarding obligations.
- Any information you choose to share with us (such as for statistical purposes)
- Information you may send to us or enter onto our website (such as CV's or Application forms).
- Administering the employment contract of Teesside Hospice employees.

*Special Category Data: some personal data is considered highly sensitive and is subject to additional safeguards. The hospice aims to limit the special categories of personal data which it processes as follows:

Health Information

The hospice may process information about an employee's physical or mental health in compliance with its obligations in connection with employment, in particular:

To administer sick pay entitlements
To comply with obligations owed to disabled employees
To comply with patient care, health regulatory and health and safety obligations.
To maintain a sickens absence record
To obtain health advice and support from external Occupational Health Service Provider.

All health information is confidential and it will only be shared internally where there is a specific and legitimate purpose to do so.

Disclosure and Barring Checks/Information (DBS)

Given the nature of our organisation, DBS requirements apply to most employees.

We are required to carry out DBS checks. In all cases, we carry out the checks in line with the applicable law.

DBS check will be repeated periodically during the course of employment.

We will always treat DBS information as confidential and it will only be shared internally where there is a specific and legitimate purpose to do so.

Equal Opportunities Monitoring

The hospice is committed to providing equal opportunities for employment and progression to all of its employees and from time to time we will process information relating to ethnic origin, race,

nationality, sexual orientation and disability, alongside information relating to gender and age, for the purposes of equal opportunities monitoring and reporting.

The provision of information relating to ethnic origin, race, nationality, sexual orientation and disability for the purposes of monitoring will be voluntary and processed for this purpose only.

The monitoring will be conducted on the basis of using anonymized data so individual employees cannot be identified.

Keeping your information up-to-date

It is essential that your personal data is accurate and up to date. Please inform us of any changes as soon as possible so that we can update your personal information. To let us know contact the Workforce Development team.

Sources of information

Information is mainly sourced directly from the employee and from prospective candidate's application forms.

Information on employees/volunteers may be generated from the individual that relates to the DBS checks and any occupational therapy reports. In addition details may also be obtained for managerial purposes throughout the course of employment/volunteering at the hospice, and kept on personnel files.

How do we store your information?

The Hospice takes the security of your data seriously, we have internal policies and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by those authorized to do so in the performance of their duties.

Paper information is stored in locked cabinets and access it strictly limited. Electronic data is stored on the hospices secure database and within associated applications utilised within the HR dept, such as Breathe and Relias.

How long will we keep your personal information?

We will not keep your information for longer than is necessary in accordance with the NHS Records Retention Schedule found on the NHS digital website and in THCF HR POL 2 Records Management Policy.

- Your personnel file for a period of seven years after you leave the organisation at that time it will be securely destroyed.
- Unsuccessful applications will be kept for 12 months if you applying for a paid role
- Volunteer role applications will be kept for 6 months.
- Student/work placement applications will be kept for 3 months.

Sharing your information.

Teesside Hospice does not routinely share information about you to anyone outside the organisation, we do though share information about you to a variety of other bodies due to a legal/statutory requirement. This includes, but is not limited to:

- Her Majesty's Revenue & Customs (HMRC)
- Department for Work & Pensions (DWP)
- Disclosure & Barring Service (DBS)
- Home Office
- Regulatory bodies, e.g. NMC, GMC
- Law enforcement agencies including the Police and the Serious Organised Crime Agency
- Care Identity Service (CIS), NHS Smartcards
- Pension providers

Everyone working in Teesside Hospice has a legal duty to keep information about you confidential. Similarly, anyone who receives information from us also has a legal duty to keep it confidential.

As clinical, fundraising and personnel information is collected for different purposes, we do not pass information between the different Teesside Hospice systems in order to protect your confidentiality unless you have given your consent for us to do so.

Where Next of Kin or family details are provided within your personnel record it is used so that we are able to contact next of kin, if needed in an emergency.

Third Party Service Providers

Teesside Hospice will share your personal information with third parties where we are required to do so by law or contract, or where it is necessary to administer the working relationship with you.

Third-party service providers may include contractors and designated agents which provide services such as pension's administrators, IT Services, mandatory training, HR packages etc. on behalf of Teesside Hospice and its employees.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your information on our instructions and they are subject to a duty of confidentiality.

Your rights

 To access your personal data by making a Subject Access Request – you can do this by approaching your line manager who will advise you of Teesside Hospice's process (see HR Pol 2 Records Management Policy). Your request once agreed will be completed within 1 month. However if your records are extensive this may take longer and you will be informed of this from the outset.

- To rectify, erase or restrict your data where this is justified.
- To object to the processing of your data where this is justified.
- To request transfer of data where this is justified (Data portability)

To make a complaint

The Data Protection & Information Governance Lead is responsible for ensuring that Teesside Hospice complies with the GDPR and can be contacted on 01642 811062 or the regulator, the Information Commissioners Office (ICO) (if you believe your data has been processed in a way that does not comply with the GDPR. Teesside Hospice's Registration Number is Z3418919. You can do so by calling the ICO helpline on 0303 123 1113 or via their website www.ico.gov.uk.

Website - Cookie / IP address use

For information on the use of cookies and IP addresses when you use our website please refer to the Privacy and Cookie Policy at https://teessidehospice.org

Updates or changes to the privacy policy

We reserve the right to make changes to the Privacy Policy. Each time you visit the web site you should check the Privacy Policy to check that no changes have been made to any sections that are important to you.

Visitor & Relative Privacy Notice

This notice aims to give you a clear view of how we use relatives and visitor's personal information and explains your privacy rights and how we gather, use and share information about you. If you have any questions or concerns about how we handle your information, please contact our Data Protection Lead on 01642 811062.

Who we are?

Teesside Hospice is a registered charity which provides specialist palliative care for adults with a life limiting illness.

Legal basis for the processing of your data

We collect the details of family members and next of kin for patients in our care. We do this under the grounds of Legitimate Interests of the person in our care to provide the best possible support to them and their loved ones. This also extends to the Legitimate interest of the family members who require support as a carer in their own right or become bereaved who may choose to receive support through our bereavement team. We may on occasion also ask you for additional information for the purposes of audit or research.

What Information we collect

The types of personal data we collect and process include: your name, car registration if you are parked here, contact details if you are the next of kin or emergency contact for one of our patients/service users.

- Visitor Information Is necessary for a legal obligation (Fire Safety, Building safety regulations)
- CCTV Is a legitimate interest to prevent crime and keep our patients, visitors, staff and volunteers safe.
- Next of Kin & Emergency contact details Legitimate interests of the patient or service user, and will only be used in the event of an emergency or at the patients request.

Why we need your personal information?

As a Hospice we provide holistic care to palliative care patients and also support for families and carers. As such it is important to understand family dynamics, who information is to be

shared with and also identify who may need to be referred for additional support within our carer support or bereavement services.

Other information we require:

- Name & Car Registration to ensure that your visit is safe and we meet fire and other building safety regulations. We may also need to find you if there is a need to move your vehicle.
- CCTV For public and staff safety, and to prevent crime.

Sharing your personal information.

We record next of kin details as part of the clinical record of the patient. If you are referred for carer or bereavement support you will be registered as a patient / client in your own right and the details given about patient data will apply to you.

We will use the data to invite you to a memorial service or advise you of other services that may be of benefit to you following the death of a loved one.

We will not pass your data on to our fundraising department without your consent.

We also collect the visitors name, car registration details and CCTV images – we will only share this information if required to do so by law. i.e. the Police, Fire Brigade.

How long we keep information?

For no longer than is necessary i.e.

- Next of Kin information in Clinical record 8 years from discharge for adults and 25 years if within a child's record.
- Visitors log data 1 month before secure disposal.
- CCTV images 30 days then deleted

Your Rights

You have the right to object to how we process your personal information, the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have the right to complain to us (see Data Protection Lead contact details above) and to the data protection regulator - ICO (Registration number Z3418919) on 0303 123 1113.

Thank you.

Privacy & Cookie policy

About Us

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Teesside Hospice Trading Company Ltd is a wholly owned subsidiary company (registered in England no. 02265205) which trades on Teesside Hospice's behalf for the sole purpose of raising funds for the hospice.

You can get in touch by calling <u>01642 811145</u> or emailing <u>marketing@teessidehospice.co.uk</u>

Teesside Hospice believes that nobody should have to face a life limiting illness alone and that's why we are here to offer support every step of the way. We help local people with cancer, heart disease, Parkinson's disease, Motor Neurone disease or a respiratory disease, or any other life limiting illness get the care they deserve at the time when they need it most.

Care, compassion, dignity and choice is at the heart of everything we do. Our aim is to reach and improve the lives of as many local people as possible living with cancer and any other life limiting illnesses.

We value our supporters and we're committed to protecting your privacy so we make sure we protect any personal information you give us.

This page, together with our terms of use for this site and our cookies policy, will let you know exactly how we use and protect your personal information. If you have any questions about it please contact us on the details above - we'd be happy to help.

How we keep your personal information safe

Below we have answered a range of questions to help you better understand how we protect your personal information:

What information do we collect?

Personal information is any information that can be used to identify you. So, for example, if you donate money, request services or products, or become involved in our campaigns, we may collect and process the personal information that you've provided. We may also collect information from you when you report a problem or if you complete a survey which we use for research purposes.

This personal information may include your name, email address, postal address, telephone or mobile number and date of birth, financial details, UK Tax payer information (for Gift Aid), credit/debit card information and records of responses to campaigns including who you have given in memory of, as well as how you came to find us or about our services or events.

We may also collect details of your visits to our website, for example your location data, other sites you've visited and the resources that you access. To understand how we use information about the communications devices you use, such as IP address (the location of the computer on the internet) and cookies, please see our Cookies policy page.

Keeping your information up-to-date

To make sure we always have the most up-to-date information about how to contact you, we may also, from time to time, update your records to reflect any changes to your personal information.

This information may come directly from you, or it may come from a third party that we consider is legitimate and trustworthy and in circumstances where it is appropriate and where you will have had a clear expectation that your details would be passed on for this purpose.

We may also combine the information you provide us with information we collect from trusted third parties. These third parties include Post Office Address File and Experian Quick Address.

How we use cookies

We use your cookies to give you a more personalised experience online. It helps us create a more effective website that reflects your needs. We may also collect and record information about how you use our site by collecting your IP address (in simple terms that just means a number that identifies a specific computer or other internet device).

By continuing to use our site, you agree to our use of cookies - but these cookie files and IP addresses will never identify you as an individual.

The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their UK Cookie Guide.

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.

- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

Say no to cookies

You can opt out of all our cookies (except the strictly necessary ones). Find out how to control and delete cookies in your browser.

But, if you choose to refuse all cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us.

Cookies we use

Cookie name	Provider	Purpose	Expiry
_ga	Google Analytics	Used to identify users and generates statistical data on the way they use our website.	2 years
_gid	Google Analytics	Used to identify users and generates statistical data on the way they use our website.	24 hours
_gat	Google Analytics	Used by Google Analytics to limit request rates.	10 minutes
cookieconsent_dismissed	teessidehospice.org	Stores the users cookie consent state for our website	1 year
october_session	teessidehospice.org	Stores the last visitor session	2 hours
admin_auth	teessidehospice.org	Stores the last administrator session	5 years
user_auth	teessidehospice.org	Stores the last user session	5 years
_stripe_mid	Stripe	Generates a random session to recognise a user	1 year
_stripe_sid	Stripe	Generates a random session to recognise a user	1 year

How do we use your personal information?

There are broadly eight ways that we may use your personal information, all to help us provide the

most relevant and personalised service for you.

1. To provide you with information (such as fundraising or campaigning activities), services or

products you've requested or which we feel may interest you. We never sell or share your

personal details with any third party for marketing purposes.

2. To allow you to participate in interactive features on our website, when you choose to do

so.

For example, we may help you auto-complete forms by inserting your contact details for you to

edit.

3. To analyse and improve the services offered on our websites.

This means we can provide you with the most user-friendly navigation experience we can.

4. To use your IP addresses to identify relevant information.

This may include information such as your approximate location. It also helps us to block disruptive

use or establish information like the number of visits to the website from different countries.

5. To make our marketing campaigns more targeted and relevant to potential donors and

customers.

6. To process personal information to help us with our work and activities

For the purposes of supporter analysis and, where you have consented to us doing so, direct

marketing. We may process your information to help us with our activities and to provide you with

the most relevant information.

7. To process personal information and/or provide this to a third party for the purposes of

profiling and understanding who visits our site.

This could be analysing demographics to inform our campaign and marketing strategies. For

example:

Age: Some campaigns would exclude supporters whose known age is not within the target audience.

Gender: Gender is also used for some email promotions, such as the Ladies Lunch.

Date Reviewed 4th November 2021

Previous interactions: A supporter's previous interaction with the Teesside Hospice is also used for targeting purposes. For example, a weekly lottery player would be prioritised for future lottery communications.

8. To match information collected from you through different means or at different times.

That could include using information collected online and offline, along with information obtained from other sources, including third parties and publicly available sources, to ensure that the information we hold about you is up to date and accurate. These include third parties such as BT OSIS, Post Office Address File and Experian Quick Address.

If you do not want us to use your data for direct marketing purposes you can contact us. Please see "How will we contact you?" below.

How long will we keep your personal data?

We always have your best interests at heart and your personal information will not be retained by Teesside Hospice for longer than necessary in relation to the purposes for which it was originally collected, or for which it was processed, subject to certain legal obligations stated below.

We will retain personal data in accordance with our records management policy. We review our data retention periods for personal information on a regular basis.

We hold personal information relating to:

- donations you've made to us for 7 years since the date of your last donation
- legacy donations if you indicate that you'd like to leave us a legacy gift we will retain personal data until 7 years after the legacy is received
- **entering lottery, raffles and draws** for 7 years in accordance with Gambling Commission legislation.
- subscribing to a newsletter or information regarding a campaign or event 5 years but you can unsubscribe at any time
- making an enquiry for information for 5 years.

We are legally required to hold some personal information to fulfil statutory obligations, for example the collection of Gift Aid or to support certain financial transactions.

We will also hold information about your details so that we can respect your preferences for being contacted by us.

The law allows you to change your consent at any time, you can do this by emailing marketing@teessidehospice.co.uk or calling 01642 811145.

How will we contact you?

It's only with your support that we can ensure that nobody has to face a life limiting illness alone. That's why we love to keep you posted with news about our work, how your support can make a difference and the variety of exciting ways you can support us in the future.

This said, we will not contact you again if you ask us not to. You can contact us to change your contact preferences by emailing marketing@teessidehospice.co.uk or calling 01642 811145.

We will never contact you to send you information about how you can support Teesside Hospice by email or text unless you have given us your prior permission and will always offer an easy way to update preferences.

How will we handle your information and other organisations?

We will not sell your personal information to other organisations for use by them in anyway.

Making our communications relevant to you

We want to ensure that we provide you with information that is relevant to you. In order to do this, we may need to analyse the information we hold on you for supporter analysis and data quality purposes. This analysis includes modelling (e.g. how likely you are to respond to the invitation) and segmenting (looking at people who are similar to you), so that you receive targeted and relevant communication.

This ensures we can spend our charitable donations effectively to obtain the biggest impact for our patients. Additionally, as our data is captured from various different sources (e.g. donation or through our website, campaign data), for data quality purposes we will analyse your data to ensure we do not have multiple versions of information on the same person on our database.

Sharing your information with third parties - keeping your information safe

Where we use an external service provider to act on our behalf such as our lottery draw providers, we will disclose only the personal information necessary to deliver the service and will have a contract in place that requires the provider to comply with data protection and information security requirements.

We may disclose your personal information to third parties if we are legally obliged to; or in order to enforce or apply our terms of use for this website or other agreements; or to protect the rights, property or safety of Teesside Hospice, our donors or others. This includes exchanging information with other companies and organisations for the purposes of fraud, or with local authorities or social services for the purposes of the provision of health, legal or social care or treatment.

How do we handle your direct debit or credit card information?

Teesside Hospice will ensure that when collecting sensitive information over the Internet such as debit cards, credit cards or personal information that this is done so securely and in accordance to data protection laws.

Teesside Hospice is Payment Card Industry (PCI) compliant and uses external PCI compliant providers to collect this data on our behalf. We do not store PCI data on our own systems.

How to best protect yourself and your personal information

To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly patched, and incorporate some form of malware protection. Only connect your devices to networks that you trust.

Where we have given you (or where you have chosen) a password which enables you to access certain parts our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

Following links to third-party websites

This website may include links to other websites, not owned or managed by Teesside Hospice. Whilst we try our best to only link to reputable websites we cannot be held responsible for the privacy of data collected by sites not managed by us, we also can't accept responsibility or liability for those policies. Please consult the privacy policy on any external website you link to before you submit any data.

Posting or sending inappropriate content

If you post or send any content that we believe to be inappropriate or content in breach of any laws, such as defamatory content, we may use your personal information to inform relevant third parties such as (but not limited to) your internet provider or law enforcement agencies.

Where do we store your information?

The personal information collected from you is stored securely on our server and backed up in Ireland.

Teesside Hospice have taken all steps reasonably necessary to make sure that your data is treated securely and in accordance with this privacy policy. We have done our best to protect your personal data, and ensured that it will be held in compliance with current data protection regulations.

Unfortunately, the transmission of information via the Internet is never 100% secure and we cannot guarantee the security of your data transmitted to our website. This means any such transmission is at your own risk.

Your rights

If you wish to exercise any of your rights, as listed below please write to us at marketing@teessidehospcie.co.uk

- a. Access to your personal information;
- b. Objection to processing of your personal information;
- c. Objection to automated decision-making and profiling;
- d. Restriction of processing of your personal information;
- e. Your personal data portability;
- f. Rectification of your personal information; and
- g. Erasure of your personal information.

If you make a request relating to any of the rights listed above, we will consider each request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be excessive in nature.

Upon successful verification of your identity via two forms of ID, one of which must be photographic, such as a passport or drivers licence, you are entitled to obtain the following information about your own personal information:

- a. The purposes of the collection, processing, use and storage of your personal data.
- b. The source(s) of the personal information, if it was not obtained from you.
- c. The categories of personal data stored about you.
- d. The recipients or categories of recipients to whom your personal data has been or may be transmitted, along with the location of those recipients.
- e. The envisaged period of storage for your personal data or the rationale for determining the storage period.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

You can make the above request by emailing <u>marketing@teessidehospice.co.uk</u> or by writing to:

Director of Income Generation Teesside Hospice Trading Ltd 410 Linthorpe Road Middlesbrough TS5 6HF

Updates or changes to the privacy policy

We reserve the right to make changes to this Privacy Policy. Each time you visit this site you should check this Privacy Policy to check that no changes have been made to any sections that are important to you. Where appropriate, any changes will be notified to you by email.

Complaints

If you have any questions or concerns about this privacy policy and our privacy practices or if you wish to file a complaint, please contact us by emailing marketing@teessidehospice.co.uk or calling 01642 811143.

You have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR. You can do so by calling the ICO helpline on 0303 123 1113 or via their website.



Addendum (1) to HR Pol 35 Privacy Policy - added 12th May 2020, updated 18/05/2021

Supplementary Privacy Notice on Covid-19 for patients and Service Users.

This notice describes how we may use your information to protect you and others during the Covid-19 outbreak. It supplements our main Privacy Notice.

The health and social care system is facing significant pressures due to the Covid-19 outbreak. Health and care information is essential to deliver care to individuals, to support health and social care services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak. In the current emergency it has become even more important to share health and care information across relevant organisations.

Existing law allows confidential patient information to be used and shared appropriately and lawfully in a public health emergency is being used during this outbreak. Using this law the Secretary of State has required NHS Digital; NHS England; Public Health England; local authorities; health organisations and GPs to share confidential information to respond to the Covid-19 outbreak. Any information used or shared during the Covid-19 outbreak will be limited to the period of the outbreak unless there is another legal basis to use the data. Further information is available on gov.uk here and some FAQs on this law are available here.

During this period of emergency, opt-outs will not generally apply to the data used to support the Covid-19 outbreak, due to the public interest to share the information. This includes National DataOpt-outs. However in relation to the Summary Care Record, existing choices will be respected. Where data is used and shared under these laws your right to have personal data erased will also not apply. It may also take us longer to respond to Subject Access requests whilst we focus our efforts on responding to the outbreak.

In order to look after your health and care needs we may share your confidential patient information including health and care records with clinical and non-clinical staff in other health and care providers, for example neighbouring GP practices, hospitals and NHS 111. We may also use the details we have to send public health messages to you, either by phone, text or email.

During this period of emergency, we may offer you a consultation via telephone or videoconferencing. By accepting the invitation and entering the consultation you are consenting to this. Your personal/confidential information will be safeguarded in the same way it would with any other consultation.

We will also be required to share personal/confidential patient information with the health and care organisations and other bodies engaged in disease surveillance for the purposes of protecting public health, providing healthcare services to the public and monitoring and managing the outbreak. Further information about how health and care data is being used and shared by other NHS and social care organisations in a variety of ways to support the Covid-19 response is here.

Covid-19 and your information

NHS England and Improvement and NHSX have developed a single, secure store to gather data from across the health and care system to inform the Covid-19 response. This includes data already collected by NHS England, NHS Improvement, Public Health England and NHS Digital. New data will include 999 call data, data about hospital occupancy and A&E capacity data as well as data provided by patients themselves. All the data held in the platform is subject to strict controls that meet the requirements of data protection legislation.

In such circumstances where you tell us you're experiencing Covid-19 symptoms we may need to collect specific health data about you. Where we need to do so, we will not collect more information that we require and we will ensure that any information collected is treated with the appropriate safeguards.

NHS Test and Trace

In order to comply with our track and trace obligations we will need to record information about visitors within the Hospice. Contact Tracing is an important way of controlling the spread of infectious diseases. It involves identifying and tracing all people who have been in contact with a person who has been infected. Depending on the nature and duration of the contact, these contacts may require advice or treatment to prevent the disease from spreading further.

The below details of visitors must be kept for NHS Test and Trace purposes:

- Name of Visitor
- Contact Number of Visitor
- Date, arrival & departure time of visit

How we are allowed to use your personal data

The use of your information is covered by the General Data Protection Regulations Article 6(1) (e) –public task

Consent

If you do not wish your contact information to be passed to NHS Test & Trace if Requested, please speak to a member of staff.

Who we share your information with

We will only share information with NHS Test and Trace if it is specifically requested by them. For example, if another visitor or member of staff at the hospice reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of visitor details for a particular time period (e.g. this may be all who visited on a particular day or time-band, or over a two-day period).

NHS Test and Trace will not disclose this information to any third party unless required to do so by law (e.g. as a result of receiving a court order).

Retention of Data

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name and contact details). Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to. Your information will always be stored and used in compliance with the relevant data protection legislation.

We may amend this privacy notice at any time so please review it frequently.



Addendum (2) to HR Pol 35 Privacy Policy - added 18/05/2021

Coronavirus (Covid-19) Asymptomatic Testing Supplementary Privacy Notice Who we are

Teesside Hospice is the 'Controller' of the personal data that you provide us with, and is registered with the Information Commissioner's Office (ICO) for the purposes of UK data protection legislation, registration number Z3418919.

How to contact us

Teesside Hospice has a Data Protection & Information Governance Lead who can be contacted at: Tel: 01642 811062

What is the purpose of this document

This privacy notice applies to Patients, Staff and Visitors who have no Covid-19 symptoms and volunteer to have a Coronavirus (Covid-19) Asymptomatic Lateral Flow Device Test (LFD) or Polymerase Chain Reaction test (PCR). The Test is conducted by Teesside Hospice on behalf of the Department of Health and Social Care (DHSC) as part of the Asymptomatic Testing program of hospices. This notice does not form part of any contract of employment or other contract services and we may update this notice at any time.

- If you need more information on Lateral Flow Testing of Visitors please refer to the following website: https://www.gov.uk/government/publications/coronavirus-covid-19-lateral-flow-testing-of-visitors-in-care-homes
- For Care Home Covid-19 Guidance information please refer to the following document:
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/946187/Care_Home_Testing_Guidance_England_v18-12_2.pdf
- If you need medical advice please refer to the NHS website: https://www.nhs.uk/conditions/coronavirus-covid-19/

What information we collect from you and why

Data Controller responsibility for Teesside Hospice's Asymptomatic Testing is broken down into;

Teesside Hospice is the Data Controller for data collected during the testing process prior
to uploading of information into the Department of Health & Social Care's (DHSC)
 Portal and implementing local arrangements in the event of a positive test and collecting
details of who has received each test kit.

 The DHSC is the Data Controller for data collected during the actual testing process and whose Privacy Policy can be found here:

https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information

We collect the following data from you:

STAFF & PATIENTS: First & Last name, date of birth, mobile phone number, email address, home address including postcode, NHS number (if known), Unique test kit code, Test kit Lot/Batch Number, date of issue of Test kits to user, and Test Results.

VISITORS (Patient & Non Patient): First & Last name, Unique test kit code, Test kit Lot/Batch Number, date of issue of Test kits to user, Test Results.

Visitors will be provided with the registration information including Teesside Hospice Unique Organisation Number to enable upload of LFT results to the DHSC portal.

Our legal basis for processing the data relating to users, is under article 6.1(f) of the UK GDPR – it is necessary in the legitimate interest of the data controller. We will process special category personal data under the provisions of article 9.2(i) of the UK GDPR, and Part 1 of Schedule 1(3) of DPA 2018 where it is in the public interest on Public Health Grounds to ensure we can minimise the spread of COVID in a timely manner and enable us to continue to deliver services as safely and securely as possible.

How we use your information

We will only ever use your personal information for the processing of Covid-19 PCR/LFD tests into the DHSC portal.

POSITIVE RESULTS: We will use this information to enact our own COVID isolation and control processes whilst ensuring respect to personal privacy in line with our data protection responsibilities.

NEGATIVE & VOID RESULTS: We will record negative and void results for the purposes of stock controls of tests and general performance of the testing process.

When you do your own testing at home or on the organisations premises, you must report the results online through the DHSC Portal and also share this result with Teesside Hospice.

How we obtain your information

We will only collect your information directly from you and no-one else.

Who we share your information with

Results from your test will be shared between you and;

• DHSC, Public Health England (PHE) – to ensure that they can undertake the necessary

Track & Trace activities and to conduct research and compile statistical information about

coronavirus.

• Local government to undertake local public health duties and to record and analyse local

spreads

A full list of recipients is available in **Testing for coronavirus: privacy information**

Teesside Hospice will not share its internal COVID-19 results register with the DHSC.

How long we keep your information for:

Teesside Hospice shall not keep the data contained in the test kit log for longer than 12 months

from the date on which it is collected.

DHCS will retain information for up to 8 years, but it may be disposed of sooner if appropriate to

do so.

What your rights are

You have a right to access your personal data, to object to the processing of your personal data, to

rectify, erase, restrict your personal data.

To request a copy of your personal data we hold for you please contact Teesside Hospice's Data

Protection & Information Governance Lead using the contact details above.

If you have any details about your rights regarding our use of your personal data, you should contact

Teesside Hospice's Data Protection & Information Governance Lead.

How to make a complaint

If you are unhappy with the way in which your personal data is being processed you may, in the first

instance lodge a complaint with the Teesside Hospice Data Protection & Information Governance

Lead using the above contact details.

If you continue to have concerns thereafter you have the right to contact the Information

Commissioners for a decision. The Information Commissioner can be contacted as below:

Helpline:

0303 123 1113

Website:

https://ico.org.uk/make-a-complaint/

Date Reviewed 4th November 2021 Next Review 1st November 2024

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Ratified By:				
Name: Annette Doyle	Signature			
Designation: Head of Workforce Development Manager				
Date:				
Name: Carole Langrick	Signature			
Designation : Chair of Workforce Development Committee				
Date:/				
(On behalf of Teesside Hospice Care Fo	oundation Board of Trustees)			