**Northern Ireland Hospice**

**Privacy Notice (Care Services)**

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| **Introduction** |

Northern Ireland Hospice (NIH) is committed to protecting the privacy of everyone who uses our care services (as patients or carers), our employees and volunteers, our education customers, our retail and café customers, our Members and Trustees, our service providers and anyone who supports our work through our fundraising activities. This policy explains what personal data we collect and process, how we collect it, how long we keep it, why we collect and process personal data, whom we share it with, and on what legal basis. It also explains the steps we take to keep data secure and ensures that you remain informed with regard to your rights and in control of your information. We will only use personal data that we collect in line with all applicable laws, including the General Data Protection Regulation (GDPR)

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| **1.0 Care Services** |

We aim to provide you with the highest quality care. To do this, we must keep records about you and the care we provide for you.

Northern Ireland Hospice collects, stores and processes personal information about prospective, current and former patients who have been referred to the hospice for any care service provided by the hospice. We also collect, store and process personal information about prospective, current and former family members, carers or friends of patients, where these details have been provided to us for the purposes of providing care e.g. next of kin details.

We process this personal data under the lawful basis of legitimate interests. The legitimate interests of Northern Ireland Hospice are to provide palliative care to patients, and support and information to their carers and families (for example social work, bereavement support, chaplain support) and to manage the effective running of Northern Ireland Hospice.

Patient consent is specifically sought for any research activity or inclusion of personal data in clinical audit work.

We also obtain and process special category data in our Care Services which is lawful for the provision of health care or treatment and the management of health care systems and services.

Family and carers may be invited to be contacted for other purposes, for example information about our activities and remembrance events and consent will be sought for this.

**1.1 What types of personal data do we handle?**

The personal data we process in relation to your care is provided to us both by yourself and by a third party healthcare professional who has referred you to us for care. These Hospice records usually include:

* Basic details such as your name, address, date of birth, NHS number, telephone number, emergency

contact(s)

* Next of kin contact details which will include, name, telephone number and address. Personal demographics

(including gender, race, ethnicity, sexual orientation, religion)

* Relevant medical information from healthcare professionals or others caring for you including physical health

or mental condition, medications, previous treatments and records of care given by other health and social

care organisations which may include test and x-ray results

* CCTV footage. We have installed CCTV systems on our premises for the purposes of public and staff

safety, security and crime prevention and detection. Images captured by CCTV will not be kept for longer

than necessary and will be managed within our Security Policy. However, on occasions there may be a need

to keep images for longer, for example where a crime is being investigated. You have the right to see CCTV

images of yourself and be provided with a copy of the images.

NIH patient records are held on paper and electronically and we have a legal duty to keep these confidential, accurate and secure at all times in line with Data Protection laws and in line with our Records keeping policy.

**1.2 What is the purpose of processing this data?**

We use information about you to:

* Provide a good basis for any treatment or advisory services we provide to you
* Make sure your treatment is safe and effective, and the advice we provide is appropriate and relevant to you
* Work effectively with others providing you with treatment or advice, ensuring that all professionals involved in

your care have relevant, accurate and up-to-date information about your health and other needs

* Enable us to make improvements to our services
* Investigate any concerns or complaints you might have, either about your care or the standards of any health

or social care professionals looking after you.

In some cases we use anonymised data (that is data where any information that identified patients has been removed) or pseudonymised data (the processing of personal data in such a way that the data can no longer be attributed to a specific data subject without the use of additional information) for clinical audit and research purposes, and to identify staff training needs, to help us to improve the quality of our services.

At NIH we use a number of patient information systems. Some of these systems are linked to NHS systems and this allows us to access medical information about you and also enables other healthcare professionals to be able to access anything that we write about you. This can help the co-ordination of your care.

We have a duty to:

* Maintain full and accurate records of the care we provide to you
* Keep records about you confidential, secure and accurate
* Provide information in a format that is accessible to you

**1.3 Sharing your information**

Sometimes your care may be provided by members of a care team. As well as NIH staff, this care team might also include people from other organisations such as health; social care; education; or other care organisations.

We will not disclose your personal information to any third party without your consent except to healthcare professionals and organisations involved in the provision of care and exceptionally, to professional bodies or otherwise as required by law, regulation or codes of practice.

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| **8.0 General Information** |

**8.1 How do you update your Personal Data?**

We want to make sure that your personal data is accurate and up to date. Please let us know if your details change. We may use publicly available sources to keep your records up to date for example, checking your postcode is correct using the Royal Mail postcode lookup facility.

To let us know of any changes please contact:

Clinical Services Administrative Team for [Adult Community / Adult In-patient / Children’s Community / Children’s In-Patient Unit] as appropriate

Northern Ireland Adult Hospice Services Northern Ireland Children’s Hospice Services

74 Somerton Road 18 O’Neill Road

Belfast Newtownabbey

BT15 3LH BT36 6WB

Tel: 028 90781 836 Tel: 028 90777 365

**8.2 What Rights do I have over My Personal Data?**

Under the General Data Protection Regulation, you have the right to:

* be informed – this privacy notice provides the information we are required to provide
* access your personal data
* have your data rectified or erased
* object to or restrict the processing of your data
* withdraw consent if that is the basis of our processing – please contact our relevant administrative team at the address or phone number above with any such requests or our Data Protection Officer using the contact details set out below with any queries on this issue
* data portability – in limited circumstances you may be entitled to have any personal data we hold and which

you provided to us sent electronically to you or direct to another organization at your request

* not to be subjected to automated decision making (including profiling) which produces legal effects or similar

significant effects – NI Hospice does not currently do this

* to lodge a complaint with NIH or the overarching regulator, the Information Commissioners Office.

Information Commissioners Office – Northern Ireland

3rd Floor, 14 Cromac Place,

Belfast,

BT7 2JB,

Telephone: 028 90 278 757

E-mail: ni@ico.org.uk

Further information on these rights is available from the Information Commissioners website <https://ico.org.uk/>.

You have a right to receive a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

You have a right to ask us to stop processing or to delete your personal data. Where there is no need to for legal or regulatory requirements to retain the data, we will be able to do this.

**8.3 How we protect and keep your data?**

We have security procedures, rules and technical measures to protect your data. Your data will be kept in a secure environment with access restricted on a need to know basis.

Personal data will not be transferred to any third party in a country or territory outside the European Economic Area unless there is a specific operational reason to do so and in which circumstance we will require the third party to comply with and safeguard the data pursuant to requirements of GDPR. We will only transfer your personal data to a Country or Territory outside the European Economic Area whose data protection laws have been assessed as adequate by the European Commission, or where appropriate safeguards are in place. See Third Party Processing section for further information.

When using websites owned by other organisations to communicate with us, such as Twitter or Facebook, then please consult their privacy policies/notices.

**8.4 Sharing of your Data by Northern Ireland Hospice**

We will not routinely disclose any information about you without your express permission. However, in addition to some specific reasons for sharing of data outlined within the various sections, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

Any disclosures of personal data are always made on a case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

The additional circumstances when we might have to share your data with other third parties are:

* You ask us to do so;
* If we are under a duty to do so under a legal obligation;
* Our duty to comply with any Court Orders which may be imposed
* To enforce our terms and conditions or other agreements;
* To protect our rights, property, our safety or the safety of our patients, customers or others;
* If the public interest is thought to be of greater importance, for example, if a serious crime has been

committed.

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes.

We may also collect and retain your information if you send feedback about our services or make a complaint

**8.5 How we keep data safe and who has access**

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected with controls regularly monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by properly trained staff, volunteers and contractors. We undertake regular data cleansing to ensure that the data is accurate and consistent with NIH Record Keeping Policy.

**8.6 Third Party Processing**

Sometimes we use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as UK or EU companies, we will take steps to make sure they provide an adequate level of protection in accordance with GDPR. Your personal data will not be transferred to countries outside the EEA unless the country‘s data protection laws have been assessed as adequate by the EEA or where adequate safeguards as are approved by the EEA and/or ICO are in place. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

**8.7 Sharing Your Story**

You may choose to tell us about your experiences with life threatening, life-limiting illness as a service user, carer, volunteer, staff member, donor or an Ambassador to help further our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report.

**8.8 Retention Period**

We do not keep your data for longer than is necessary for the purposes for which it was provided. We will retain information on individuals in compliance with statutory requirements or in line with organisational needs where there are no such statutory requirements. This is in accordance with our Records Keeping policy and adheres to the requirements of the GDPR. This policy sets out our retention periods for specific types of personal data and/or the criteria we will use to determine that period.

Current retention timeframes are set out below:

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| **Category** | **Retention Timeframe** |
| Adult services - patient health records | 10 years after date of last entry or  10 years after patient passes away |
| Adult services – electronic documents relating to patient health records |
| Adult services Patient electronic database | Archived 4 years after death or date of last entry |
| Children and Young People services - patient health records | Under 17 years – until the patient’s 27th birthday  17 years – until the patient’s 27th birthday OR  10 years after the patient passes away if patient passed away while in the care of the organisation\*  *\* If the illness or death could have potential relevance to adult conditions or genetic implications for the family of the deceased, the advice of clinicians should be sought as to whether to retain records for a longer period*. |
| Children and Young People services – electronic documents relating to patient health records |
| Children and Young People Services - Patient electronic database |
| Complaints | 10 years |
| Subject Access Requests | 3 years after last action |
| Patient involved in Clinical Trials | 15 years after date of last entry or  15 years after patient passes away |
| Research project records | 10 years (after Project has completed) |

**8.9 Changes to this Privacy Notice**

We might change this Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the NIH website or by contacting you directly. The date when this privacy notice was last updated will be stated at the end of the Policy

If you have any questions about this privacy notice or about our data processing in general, require more information, of if you want to see what information we hold about you, please contact our Data Protection Officer

using the following contact details:

Beverley Kernoghan

Data Protection Officer

Northern Ireland Hospice

18 O’Neill Road

Newtownabbey

Co Antrim

BT36 6WB

Tel: 028 90781 836

Email: [beverley.kernoghan@nihospice.org](mailto:beverley.kernoghan@nihospice.org) Updated: June 2018