

PRIVACY POLICY

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Section:	Support Services	Date of Last Review:	February 2020
Approved By:	Director of Finance and Support Services		
Reviewer:	Amanda Hill	Date of Review:	July 2020

Who are we?

Dove House Hospice is a charity providing excellent care for people in the local community with life limiting illnesses. We are specialists in palliative care, which is the total care of patients whose illness is no longer curable and for whom the goal must be quality of life.

Dove House is the data controller responsible for keeping your data safe and using it wisely. This means that we are responsible for ensuring that we do so in full compliance with the Data Protection Act 2018, GDPR2018, all other related privacy laws and any codes of practice issued by the Fundraising Regulator, NHS and Caldicott Guardian requirements for confidentiality and information security standards, this Privacy Policy and regulations set by the Information Commissioner. Our intention is to be compliant, user friendly and to ensure our supporters only receive information they are interested in.

This Privacy Notice applies to all information held by Dove House Hospice Limited and our subsidiary Dove House Trading Limited relating to individuals, whether you are a patient, service user, member of staff, volunteer, supporter or contractor.

We care about your personal data and it is important that you know how we use it and how we keep it safe. This Privacy Notice covers how, when and why we use your information and explains the choices you can make about the way in which we use your information and how you have the right to change your mind at any time.

This Privacy Notice is not exhaustive, and we are always happy to provide any additional information or explanations where needed. Please contact our Data Protection Lead either by email, telephone or in writing using these contact details:

Data Protection Lead, Dove House Hospice, Chamberlain Road, Hull, HU8 8DH.

Email: info@dovehousehospice.org.uk

Definitions – 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, I.P. address, photo or video image or voice recording. For our patients, some of this data will be sensitive and relate to their health and wellbeing, ethnicity and religious views.

The Hospice processes several different types of information:

- Identifiable – containing details that identify an individual. This may include but is not limited to such information as name, address, NHS number, full postcode, date of birth.
- Pseudonymised – information where individuals can be identified by using a coded reference which does not show their 'real world' identity.
- Anonymised – information about individuals with identifying details removed.
- Aggregated – statistical information about a group of individuals that has been combined to show general trends or used for benchmarking purposes.

Our records may be held on paper or in electronic computer systems.

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Why we require your information

We will require your personal identifiable information if you:

- are patient accessing care services or are next of kin to a patient
- support or engage with us by participating in events, initiatives and/or campaigns
- donate money, services or goods to us
- apply for a job or hold a contract of employment with us
- apply for a volunteer role or volunteer your time on a formal basis
- provide goods or services to us
- make an enquiry or complaint

Information we collect and hold about you

We need to use information about you in various forms and we will only use the minimum amount of information necessary for the purpose. Sometimes we will use information that does not identify you i.e. statistics / anonymised reports.

How and when we collect your information

We will collect your information on either paper, electronic forms or via the web and subsequently record and store this information whenever you interact with us. This may be when:-

- Supporting and/or donating towards funding the care we provide
- Registering for an event/campaign
- Buying goods in our shops or online
- Registering with Little Owls Day Nursery
- Enquiring about our care services and accessing our care services
- Taking part in our training courses
- Applying for a volunteer role
- Applying for a job
- Working or volunteering for us
- Joining our Lottery
- Participating in Retail Gift Aid Scheme

How we use your information

We will primarily use the personal data for the following purposes:

- administration - To provide the goods and services you request (including taking payments) and to communicate with you in the event that any goods or services requested are unavailable, or if there is a query or problem with your request
- charity fundraising - To administer any donations (including taking payments) you agree to make including complying with Gift Aid requirements and to communicate with you in the event of a query
- personnel matters - To administer your employment or voluntary work where you become an employee or volunteer
- fraud prevention - To detect and reduce fraud and credit risk
- market research - To carry out market research so that we can improve the goods and services we offer
- profiling - To create an individual profile for you (including analysing demographic and geographic information) so that we can enhance your experience and relationship with us, understand and respect your preferences and to provide information and details of relevant offers and opportunities where you have agreed to receive them
- charity regulation - To comply with our charity obligations

National Data Opt-Out

How the NHS and Care Services use your information

Whenever you use a health or care service, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and

<https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

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Health and care organisations have until 2020 to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care. Our organisation is currently compliant with the national data opt-out policy.

Service Users – What information do we collect about you?

Individuals who are under the care of Dove House Hospice and in receipt of one or more of our services are service users. The term includes those referred to us but currently not in receipt of care, those who have been in receipt of one or more of our services and their details retained for the time-being and individuals enquiring into any of our services.

Types of information

The types of information that we might collect or hold on you includes name(s), addresses, date of birth, contact details including email and telephone, your next of kin and family information, your doctor's contact details. We will also collect information of a sensitive nature relating to your medical history, current medical requirements and information of a sensitive nature including race, religion and ethnicity.

Sources of your information

Your information may be sourced directly from you, a loved one, family member or other legal guardian. Information about you concerning your health or that is required to provide you with health and social care services may also be sourced directly or indirectly from your doctor, health professional or from the NHS.

Consequences of not being able to process your information

Dove House Hospice will rely on several lawful grounds for processing your information contained within the Data Protection Act 2018 and the GDPR 2018 and will also seek your consent where required by law to do so. If we do not have the ability to process your information this may seriously impact the provision of health and social care services and how we address your care needs.

Purposes of processing

Information is collected and processed for the purpose and intention of providing one or more of our clinical or support services, the effective provision of personalised care and to comply with clinical reporting requirements.

We may collect personal-sensitive information relating to race, faith, sex, religion, family life, health and care received for statistical and reporting purposes (in this case your information will be anonymised, and it will not be possible to identify you).

If you, a relative or a friend, are cared for or are supported by Dove House Hospice, the personal-sensitive information you provide to us will be used only for the purposes of offering access to and providing you with services including bereavement support, for training our staff or for monitoring the quality of our services.

Information sharing

Information about service users is held securely on our internal IT systems and we use SystemOne, which is a patient records system, as your primary care record. This information may be shared with NHS and other care agencies as well as with Clinical Commissioning Groups and Lead Care Providers (who are contracted for care purposes) for the holistic provision of care or for statistical reporting requirements.

Any sharing of information is in compliance with The Data Protection Act and the Health and Social Care (Safety and Quality) Act 2015. Where it is possible to minimise the amount of information shared or anonymise records so as not to identify an individual, these precautions will be applied to protect your personal information.

In general, only information necessary for the provision of direct care and in the best interest of the service users, will be shared with other care providers.

Data security

We are committed to protecting your privacy and will only process personal confidential data in accordance with the Data Protection Act 2018, the General Data Protection Regulation (2018), the Common Law Duty of Confidentiality,

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The Health and Social Care (Safety and Quality) Act 2015 and the Human Rights Act 2018. The various laws and rules about using and sharing confidential health and social care information, with which Dove House Hospice will comply, are available in “[A guide to confidentiality in health and social care](#)” which is published on the NHS Digital website. The Hospice also has a local policy on Confidentiality which can be made available on request. We take the security of personal data seriously. We employ security technology, including firewalls, and encryption to safeguard personal data and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage.

Personal data in our databases is only accessible by appropriately trained staff and volunteers who need to access your personal data as an essential part of their role. All access is tracked through individual login credentials.

We only use third party service providers where we are satisfied that the security they provide for your personal data is at least as stringent as we use ourselves.

All health and social care organisations are required to provide annual evidence of compliance with applicable laws, regulation and standards through the [Data Security and Protection Toolkit](#), <https://www.dsptoolkit.nhs.uk> providing assurance to you of how we protect your information.

All of our staff, volunteers and Governing Board of Trustees receive appropriate and on-going training to ensure they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. All staff are trained to ensure they understand how to recognise and report an incident ensuring that the organisation’s procedure for investigating, managing and learning lessons from incidents.

Confidentiality Advice and Support

The Hospice has a Caldicott Guardian who is a senior person responsible for protecting the confidentiality of service users and service user’s information and enabling appropriate and lawful information-sharing. Further information about the role of the Caldicott Guardian is available on request.

Your Rights

You have certain legal rights:

- The right to be informed (transparency over how we use your data)
- Right of Access (Tell you if we have your data; give you a copy of your data)
- Right to Rectify (Correct your data)
- Right of Erasure (Delete your data)
- Right to Restrict Processing (Stop processing your data but not delete)
- Right of Portability (Give you your data in common, machine readable format)
- Right to Object (to direct marketing, to processing for scientific / historical research or statistics, to processing based on legitimate interests or public interest)
- You also have a right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered.

If we do hold identifiable information about you and you have any queries about the information we hold, please contact the Data Protection Lead either by email, or in writing using these contact details:

Data Protection Lead, Dove House Hospice, Chamberlain Road, Hull, HU8 8DH. Email: info@dovehousehospice.org.uk

Complaints

Dove House Hospice aims to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring concerns to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. Contact details for complaints regarding the processing of information should be directed to the Data Protection Lead, Dove House Hospice, Chamberlain Road, Hull, HU8 8DH. Email: info@dovehousehospice.org.uk

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You can also raise a concern directly with the ICO <https://ico.org.uk> although our aim is to resolve your complaint swiftly ourselves in the first instance. For more information on how to make a suggestion or complaint, please see our guidance leaflet 'Comments, Compliments and Complaints'.

Lawful basis of processing personal data

The lawful basis for the collection and use 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.

Disclosing your personal data

We do not sell personal data but if, for example, we hold a fundraising event in conjunction with another organisation, we may share information between us, in which case, we will make that clear to you when you provide the personal data.

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that your personal data is properly protected and that it is only used in accordance with this Privacy Policy.

We use third party electronic payment providers such as World Pay to administer some transactions. They have their own privacy policies and we encourage you to read them.

We may share your personal data with health and social care professionals and organisations involved in the provision of your care, always within the appropriate regulations governing sharing of your health and social care records. In some cases, we may share to professional bodies or otherwise as required by law, regulation or codes of practice

Preferences / Subscribe / Unsubscribe

You can change your mind about whether you wish to receive information or can choose to hear only about a specific event or activity.

You can change your preferences at any time by using any of the methods shown below (see the section 'Updating and correcting personal data') or by following the instructions with each communication you/they receive.

Please note it may take up to one month for your changes to be implemented and for communications to cease.

Monitoring

We may monitor or record telephone calls for security purposes and to improve the quality of the services we provide to you.

We also monitor through CCTV cameras that are located throughout our premises. Your information is being collected and used:

- To create a safer working environment for staff, volunteers and visitors.
- To protect property belonging to Dove House, its staff, volunteers and visitors.
- To provide evidence in support of any internal or external enquiry, disciplinary proceedings or prosecution, especially if associated with the security of Dove House, criminal activity committed on hospice property, or the misuse of hospice property or equipment.

Images will be retained as per our data retention policy. After this period the images are permanently deleted, unless they are required for an ongoing incident/investigation which has been identified (for example, if a crime has been observed and recorded or if the images have been retained while a subject access request is being processed). In such cases images will be retained for a long as necessary (for example, until the conclusion of any criminal proceedings arising from the incident).

All locations where your personal data may be captured are clearly communicated through signage.

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Access to, and disclosure of, images is restricted and carefully controlled to ensure privacy of individuals, but also to ensure that the continuity of evidence remains intact should the images be required for evidential purposes.

Data Retention

Your information will be kept for the period of time the purpose it was collected dictates and/or as long as we are legally bound to keep it - such as HMRC regulations - according to our Data Retention Policy, a copy is available on request.

Use of Your Personal Data Outside of Europe

Participants in our Project ECHO (Extension for Community Healthcare Outcomes) programme will have their data shared and stored outside of the European Economic Area using Zoom and Box, both companies are covered by the [EU-US Privacy Shield Framework](#) which has been deemed adequate by the ICO. For all other data we do not currently transfer personal data outside of the United Kingdom or the European Economic Area. If this changes, and we do need to transfer your personal data to other territories, we will take proper steps to ensure that it is protected in accordance with this Privacy Policy and applicable privacy laws.

Cookies

Cookies are small pieces of text that are stored by your browser. Each cookie has a name and is associated with a particular site. When your browser sends a request to a site (for example, to download a page, image, or video), the computer that responds (known as a server) may tell your browser to set one or more cookies. When your browser makes further requests to the same site it sends the cookies back to the server. This allows the server to remember you as you browse the site and provide features such as shopping baskets or password-protected areas. You can control which types of cookies you allow by turning cookies on or off in your web browser's settings but if you choose to do so some features on our site may no longer work. You can also delete cookies by clearing your browser's cookie cache (history).

Data collected by third parties on our behalf

Spoton.net

Our Little Owls and Humber Wood Recycling sites are hosted by Spoton.net Limited (registered company number 06139437 in England and Wales). Spoton.net logs all requests in order to determine the causes of reported faults and to detect and block suspicious traffic. The log records the time of the request, your IP address, the requested resource, the referring site (if specified by your browser), and your browser's user agent string (which will usually include the name and version of your browser and operating system). Log files are deleted after ninety days.

Cloudflare

Our Little Owls and Humber Wood Recycling sites are served through Cloudflare. Cloudflare helps our site load faster by storing copies of our content in data centres around the world and defends our site from attacks by logging requests to detect and block suspicious traffic. For more information on how Cloudflare handles the data it collects, see [Cloudflare's privacy policy](#).

Google Analytics

We use Google Analytics to track visitor interaction with our site in order to produce statistical reports. Google collects details of the pages you view and the time you viewed them, the features of your browser, and your IP address. We have enabled IP [anonymisation](#) so that Google will not store your complete IP address. For more information on how Google handles the data it collects, see [Google's privacy policy](#).

To opt out of Google Analytics tracking on our site, see the Google Analytics section of our cookie policy. To opt out of Google Analytics tracking on all sites, use the [Google Analytics Opt-out Browser Add-on](#).

Mapbox Maps

When you view a page containing Mapbox maps, your browser connects to Mapbox. For more information on how Mapbox handles the data it collects, see [Mapbox's privacy policy](#).

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Updating and correcting personal data

In order to save the hospice money, we use data cleansing services to update us on people who have moved home or who have died. If you have registered a change of address with the Post Office's National Change of Address database, we will update your details through this mechanism. Similarly, for relevant activity, if you use the Fundraising Preference Service to withdraw consent to receiving direct marketing from us, we will amend our records accordingly.

You may update or correct your personal data yourself online at www.dovehouse.org.uk/data or can contact us and ask us to do it for you (see the section 'How to contact us' below). Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person.

We encourage you to promptly update your personal data if it changes. If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

HOW TO CONTACT US

Website: www.dovehouse.org.uk

Email: info@dovehouse.org.uk

Phone: 01482 784343

Dove House Hospice

Chamberlain Road

Hull

HU8 8DH

Company Information

DOVE HOUSE HOSPICE LIMITED

A company limited by guarantee registered in England and Wales company no. 01498747

Registered office: Dove House Hospice, Chamberlain Rd, Hull, HU8 8DH

Registered charity no. 509551

Subsidiary

DOVE HOUSE TRADING LIMITED

Registered Office: Dove House Hospice, Chamberlain Road, Hull, HU8 8DH

Registered in England and Wales Company Number: 03036808 VAT No. 764183320

Links to other websites

Please note, this Website may contain links to other websites that are not controlled by us. These links are provided for your convenience. We are only responsible for our privacy practices and our security. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit and each organisation that holds your personal data.