

Thames hospice

Policy: DATA PROTECTION POLICY

Date	Author/ Reviewer	Approved by	Doc name	Comment	Responsible Committee	Next Review
May 2018	Juliana Luxton Head of Governance and Quality.	SMT	ADM-P-0014	<p><u>May 2018</u> Appendix 1 updated. Appendix 2 Privacy Statements updated.</p> <p>Policy revised to take account of GDPR and Data Protection Act 2018 from May 25 2018.</p> <p><u>Feb 2018</u> Appendix 2B updated to say, "We will never sell your data"</p> <p><u>Jan 2018</u> Policy Reviewed in light of GDPR. Section 6 updated. Appendices Updated.</p> <p><u>July 2017</u> Policy reviewed. Minor updates to text and layout.</p> <p><u>December 2016</u> Policy reviewed and updated. Appendix 1 added.</p> <p><u>Jan 2016</u> New Policy.</p>	Governance and Health and Safety Committee	May 2020

1 Purpose of Policy

- 1.1 Thames Hospice is a charity supporting people living in East Berkshire and South Buckinghamshire. Thames Hospice needs to collect personal information about people we interact with in order to carry out our business and provide our services because:
- We provide healthcare services to our patients.
 - We ask for support from fundraisers and donors.
 - We raise funds via our retail outlets.
 - We manage various functions, such as HR or payroll that require us to keep (personal) data about our staff or volunteers.
- 1.2 Therefore, people on whom we may hold data include patients, employees (present, past and prospective), volunteers, fundraisers and donors, those who shop in our stores or play our lottery, suppliers and other business contacts.
- 1.3 The information we might hold or process on individuals may include name, address, email address, date of birth, private and confidential information, and sensitive information. We often hold financial or health data on individuals.
- 1.4 In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law. No matter how it is collected, recorded and used (e.g. on a computer or on paper) this personal information must be dealt with properly to ensure compliance with the Data Protection Act 2018 (the Act) and the General Data Protection Regulations (GDPR).
- 1.5 The lawful and proper treatment of personal information by Thames Hospice is extremely important to our success and in order to maintain the confidence of our service users and employees. We ensure that we treat personal information lawfully and correctly.
- 1.6 This policy should be read in conjunction with other Thames Hospice Policies including but not limited to the Thames Hospice Information Governance Policies and the Thames Hospice Confidentiality Policy.

2 Responsibilities

- 2.1 Thames Hospice will:
- Ensure that there is always one person with overall responsibility for data protection. This person is the Head of Governance and Quality who is appropriately qualified and experienced in data protection.
 - Provide training for all staff members who handle personal information.
 - Provide clear lines of report and supervision for compliance with data protection.
 - Carry out regular checks to monitor and assess new processing of personal data and to ensure the Thames Hospice notification to the Information Commissioner is updated to take account of any changes in processing of personal data.
 - Develop and maintain data protection procedures to include roles and responsibilities, notification, subject access, training and compliance testing.

- 2.2 Data Protection Officer: Head of Governance and Quality. This individual is also the Thames Hospice SIRO (Senior Information Risk Owner).
- Responsible for the application of policy and procedure, provision of guidance, training and support for the implementation of Information Governance principles in all strategic and service developments and day-to-day provision of services and care.
 - To report any breaches to appropriate external bodies, e.g. the Office of the Information Commissioner, as required.
 - To ensure the principles of data protection and information governance are applied as part of normal practice in the provision of care and other services.

The Thames Hospice Data Protection Officer can be contacted on

Phone	01753 842121
Letter	Thames Hospice Data Protection Officer, Thames Hospice, Pine Lodge, Hatch Lane, Windsor, SL4 3RW
email	dataprotectionoffice@thameshospice.org.uk

- 2.3 Caldicott Guardian: Director of Patient & Family Services.
- Responsible for the management of patient /service user confidentiality and information use, sharing and disclosure issues by:
 - Providing advice and being accountable for that advice.
 - Being the conscience of the organisation.
 - Providing a focal point for patient/service user confidentiality and information sharing issues.
 - Being concerned with the management of patient /service user information.

The Thames Hospice Caldicott Guardian can be contacted on

Phone	01753 842121
Letter	Thames Hospice Caldicott Guardian, Thames Hospice, Pine Lodge, Hatch Lane, Windsor, SL4 3RW
email	caldicottguardian@thameshospice.org.uk

- 2.4 Information Asset Owners: Directors who are directly responsible for the databases and information related to their department:
- Patient Databases: Director of Patient and Family Services.
 - Finance & Payroll Databases: Finance Director.
 - Human Resources Database: Director of Human Resources.
 - Fundraising/Donor Databases: Director of Fundraising.
 - Retail Databases: Retail Director.
- 2.5 Information Asset Administrators: – team leaders managing the use of the data.
- 2.6 Users: anyone using the data as part of their work.
- 2.7 All employees will, through appropriate training and responsible management:
- Observe all forms of guidance, codes of practice and procedures about the collection and use of personal information.
 - Understand fully the purposes for which Thames Hospice uses personal information.

- Collect and process appropriate information, and only in accordance with the purposes for which it is to be used by Thames Hospice to meet its service needs or legal requirements.
- Ensure the information is correctly input into all Thames Hospice systems.
- Ensure the information is securely destroyed (in accordance with the Thames Hospice Records Retention Schedule – see Thames Hospice Records Policy) when it is no longer required.
- On receipt of a request for information held about an individual, immediately notify the Head of Governance and Quality.
- Not send any personal information outside of the United Kingdom without the authority of the Head of Governance and Quality or the Caldicott Guardian.
- Understand that breaches of this Policy may result in disciplinary action.

3 Scope

- 3.1 All Thames Hospice staff, volunteers and teams and sites are within the scope of this document.
- 3.2 All staff working in or on behalf of Thames Hospice (this includes contractors, temporary staff, secondees and all volunteers and permanent employees) are within the scope of the document.

4 Access to Records (Subject Access Requests or 'SARs')

- 4.1 The Head of Governance and Quality manages all SARs on behalf of Thames Hospice.
- 4.2 Patients and anyone else on whom we hold records (staff, volunteers, donors, etc) have the right of access to their records or healthcare records in line with the requirements of the Data Protection Act 2018 and the requirements of GDPR.
- 4.3 Requests to access records must be made to the Head of Governance and Quality in writing.
- 4.4 The Hospice will respond to any request within legal timeframes.
- 4.5 In some cases where information recorded is assessed as detrimental to the health or well-being of the individual, information may be withheld. In the case of healthcare records, this must be justified and recorded appropriately by the Head of Governance and Quality working together with the Medical Consultant.
- 4.6 Patient representatives may request copies of patient medical records. Such requests should be made in writing to the Head of Governance and Quality, who will liaise with the Consultant or key clinician prior to providing copies of notes made. The Hospice reserves the right to make a moderate charge for this service.
- 4.6.1 Patients or their representatives MUST NOT be given the original copy of their notes to take away – ownership lies with the Hospice.**
- 4.7 Third Party Requests. In some cases, other third parties may request access to records, e.g., Police, Solicitors, Insurance Companies, etc. Requests should be made in writing to

the Head of Governance and Quality, who will liaise with the Consultant, key clinician or appropriate manager prior to providing copies of any data. The Hospice again reserves the right to make a moderate charge for this service.

5 Donor Data

- 5.1 Donor data will be processed in line with legislation and guidance, including, but not limited to the Data Protection Act, and guidance from the Fundraising Regulator's Code of Fundraising Practice:
<https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/code-of-fundraising-practice/>
- 5.2 We will use personal information:
- To provide services, products or information requested.
 - To create an account for donors if registered with us.
 - For administration purposes.
 - To further our charitable aims, including for fundraising activities. (Fundraising and related research may include new prospect identification research and wealth screening.)
- 5.3 We may analyse and screen the personal information we collect to create a profile of donor interests and preferences so that we can contact donors in the most appropriate way and with the most relevant information. Where relevant, we may also assess donor personal information for the purposes of fraud.
- 5.4 We will contact potential donors based upon their expressed preferences for contact from us.
- 5.5 There are different legal conditions through which we can send direct marketing to an individual. One of them is called 'legitimate interest', which enables us, in certain circumstances, to send direct marketing to an individual without having their prior consent. When we use legitimate interest we will make sure that individuals have the opportunity to say 'no' or object to future direct marketing. (See Appendix 1).
- 5.6 We will send direct marketing by post where:
- There is a legitimate interest, AND
 - The legitimate interest is not overridden by the rights and interests of the individual.
- 5.7 Our donors and supporters will be treated fairly and respectfully and we will ensure that we meet our legal obligations. Using our Legitimate Interest Matrix (see Appendix 1), we will ask:
- Do we have a legitimate interest, taking account of the individual's reasonable expectations? Are we sure we aren't overriding their fundamental rights?
 - Are we confident we pass the legitimate interest test?
- 5.8 We will undertake a balancing assessment to consider what an individual would reasonably have expected their personal information to be used for at the time that they provided it.

- 5.9 We publish privacy notices (see Appendix 2) which go into more detail about how we do this.
- 5.10 Keeping donor data safe - Personal information and details of enquiries received are stored on a secure database.
- 5.11 If for any reason a donor wishes to have personal details removed from our records, they can contact us and request that data is removed. We will always comply promptly with such requests.
- 5.12 We will remove the details of anyone who has not actively supported us in the last eight years.

6 Distribution and Implementation

- 6.1 This document is made available to all staff and volunteers, and is published on the Thames Hospice website.
- 6.2 A global notice will be sent to all staff notifying them of the release of this document.

7 Training Plan

- 7.1 A training needs analysis has been undertaken for staff and volunteers affected by this document.
- 7.2 Based on the findings of that analysis, appropriate training is provided to staff and volunteers as necessary.

8 Monitoring

- 8.1 Compliance with the policies and procedures laid down in this document will be monitored by the Head of Governance and Quality, together with independent reviews by auditors.
- 8.2 The Head of Governance and Quality is responsible for the monitoring, revision and updating of this document on a two yearly basis or sooner if the need arises.

9 Breach of Policy

- 9.1 Any deviation in practice from the above policy and procedure will be deemed a breach of policy.
- 9.2 Any breach of this policy by Thames Hospice employees may lead to formal disciplinary action.
- 9.3 Any breach of this policy by Thames Hospice volunteers may lead to formal action under the Problem Solving Policy and Procedure.

APPENDIX 1 – THAMES HOSPICE LEGITIMATE INTEREST MATRIX

LEGITIMATE INTEREST MATRIX - MAY 2018

Type of Supporter	Type of contact															PRIVATE PHASE	PUBLIC PHASE	IN TOUCH
	GAMBLING		MASS EVENTS			IN MEM EVENTS		APPEALS			EVENTS							
	Lottery	Raffle	Sunflower Walk	Bubble Rush	Santa Dash	Light up a Life	Other	Sponsor a...	Cash Appeals	Other	Carol Concerts	Community Events	Legacy Events	Challenge Events				
Opt In Generic	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	
ACTIVE Positive contact in last 3 years. These people have not formally opted in, but are on our database as supporters. Balance: Legitimate interests	NO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	On advice of Head of Major Gifts and Capital Appeal	✓	✓	
LAPSED Positive contact in last 4-8 years. These people have not formally opted in, but are on our database as supporters. Balance: Legitimate interests	NO	NO	NO	NO	NO	NO	✓	✓	✓	✓	✓	✓	NO	NO		✓	✓	
Raffle Players	✓	✓	✓	✓	✓	NO	NO	✓	✓	✓	✓	✓	NO	✓		✓	✓	✓
Lottery Players	✓	✓	✓	✓	✓	NO	NO	✓	✓	✓	✓	✓	NO	✓		✓	✓	✓
Retail Gift Aid These people have not formally opted in, but are on our database as supporters. Balance: Legitimate interests	NO	Yes - email only	NO	NO	NO	NO	NO	✓	✓	✓	NO	NO	NO	NO		✓	✓	✓
Inserts anonymous so all OK	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓
Fundraising groups	NO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	NO		✓	✓	✓
In Mem	NO	NO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	NO		✓	✓	✓
Legacy Pledgers	NO	NO	NO	NO	NO	✓	✓	✓	✓	✓	✓	✓	✓	NO		✓	✓	✓

NOTE: Writing to those on the database to confirm mailing preferences is always a future option
NOTE: It is always OK to thank a donor, even if they specifically state no further mailing contact

NEXT REVIEW: NOVEMBER 2018

APPENDIX 2 – PRIVACY STATEMENTS

A. PRIVACY AND PATIENT INFORMATION

1. Your information - what you need to know about your health records at Thames Hospice

What we do

Thames Hospice is a local charity supporting people living in East Berkshire and South Buckinghamshire. We provide expert nursing and medical care, with emotional and practical support for adults who have illnesses from which they are not expected to recover. Our care and support extends to family, friends and carers.

Why we collect information about you

In carrying out some of these roles we may collect information about you, which helps us respond to your queries or provide specialist services. We may keep your information in written form and/or on a computer. The records may include basic details about you, such as your name and address. They may also contain more sensitive information about your health and also information such as financial information if you are a donor to Thames Hospice.

How we keep your records confidential

Everyone working for Thames Hospice is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised and consented to by the patient, unless there are other circumstances covered by the law.

All our staff are also required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

Other organisations with whom we may share your Personal Information

Our guiding principle is that we are holding your records in strictest confidence.

We may share your information for health purposes with other organisations such as NHS Trusts, General Practitioners (GPs) and other contracted service providers such as Community Health Service providers.

We are also required by law to report certain information to the appropriate authorities. This is only provided after formal permission has been given by a qualified health professional. Occasions when we must pass on information include:

- Where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS).
- Where a formal court order has been issued

Information may also be required to be shared for your benefit with other organisations, from which you are also receiving care, such as social services. Where information sharing is required with third parties, we will not disclose any health information without your explicit consent, unless there are exceptional circumstances, such as when the health or safety of others is at risk or where the law requires it.

The Governance Team may look at your records to monitor and audit the quality of records and care, or if dealing with a complaint.

The Care Quality Commission, our regulatory body, may also look at records as part of their inspection process; they will ask your consent.

There is occasionally very limited access to identified members of our administration team in support of patient and family related events.

Your Right to Withdraw Consent for us to Share Your Personal Information

At any time you have the right to refuse/ withdraw consent to information sharing. The possible consequences will be fully explained to you and could include delays in receiving care.

How can you get access to your own health records?

You have the right to see or have a copy of your health records. You do not need to give a reason for this.

If you want to access your health records you should make a written request to the Head of Governance and Quality at Thames Hospice. You should also be aware that in certain circumstances your right to see some details in your health records may be limited in your own interest or for other reasons.

2. Your information- Other Records at Thames Hospice

All our services are free, thanks to the generous support of fundraisers and donors who help to raise the money that we need to run our Hospice each year. This means that we also collect information about people who contribute to our fundraising or make a donation. Again, we treat all information confidentially. See our Privacy Statements and our Fundraising Promise.

Further Information

If you would like to know more about how Thames Hospice uses your information please **contact** our Head of Governance and Quality who is the Thames Hospice Data Protection Officer.

Phone	01753 842121
Letter	Thames Hospice Data Protection Officer, Thames Hospice, Pine Lodge, Hatch Lane, Windsor, SL4 3RW
email	dataprotectionoffice@thameshospice.org.uk

Further information can also be obtained from the NHS Care Record Guarantee and the NHS Confidentiality Code of Conduct.

For independent advice contact The Information Commissioner:

Helpline number 0303 1231113 or at www.ico.org.uk

B. THAMES HOSPICE SUPPORTER PRIVACY STATEMENT

We are committed to protecting your privacy. This statement describes how we collect and use personal information about people who donate to us or visit our websites. The terms of this statement may change, so please check it from time to time.

How do we collect information?

We obtain personal information from you when you enquire about our activities, register with us, buy items through our online shop, make a donation to us, or ask a question via our '*Contact Us*' section.

What information do we collect?

The personal information we collect might include name, date of birth, email address, postal address, telephone number and credit/debit card details.

We also gather general information about the use of our websites, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in Thames Hospice emails. We may use this information to personalise the way our websites are presented when users visit them, to make improvements to our websites and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information that does not identify individual visitors to our websites.

How do we use this information?

We will use your personal information:

- To provide you with the services, products or information you have requested.
- To create an account for you if you register with us.
- For administration purposes.
- To further our charitable aims, including for fundraising activities. (Fundraising and related research may include new prospect identification research and wealth screening.)

As part of this, we may analyse and screen the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information. Where relevant, we may also assess your personal information for the purposes of fraud and credit risk reduction.

Keeping data safe

Your personal information and details of the enquiries received are stored on a secure database. If for any reason you wish to have your personal details removed from our records, please contact us using the contact details below.

Your choices

You have a choice about whether you want to receive information about our progress and fundraising activities. We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted. You can change your marketing preferences at any time by contacting us at any time.

How do we protect personal information?

All of our online forms are protected by encryption. We also use a secure server when you make a donation or payment via our websites. We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used.

Will we disclose the information we collect to outside parties?

We will never sell your data. We may pass your information to our service providers e.g. mailing companies to post our newsletter, agents e.g. data services to clean our data: and associated organisations e.g. suppliers for the purpose of completing tasks, such as mailing you or updating your personal information and providing services to you. Where we use service providers we will make sure there are appropriate controls in place, and they must always sign a confidentiality agreement where your data is kept securely and only used for the purpose of the Thames Hospice project for which they have been appointed.

Links

Our websites may include links to websites run by other organisations. Thames Hospice is not responsible for the privacy practices of these other websites so you should read their privacy policies carefully.

Changes

If your personal details change, please help us to keep your information up to date by notifying us at the above address.

We may change the terms of this privacy statement from time to time. If we do so, we will post the changes here, so please check from time to time. By continuing to use our websites you will be deemed to have accepted such changes.

Further Information

If you would like to know more about how Thames Hospice uses your information please **contact** our Head of Governance and Quality who is the Thames Hospice Data Protection Officer.

Phone	01753 842121
Letter	Thames Hospice Data Protection Officer, Thames Hospice, Pine Lodge, Hatch Lane, Windsor, SL4 3RW
email	dataprotectionoffice@thameshospice.org.uk

For independent advice contact The Information Commissioner:
Helpline number 0303 1231113 or at www.ico.org.uk

C. EMPLOYEE AND JOB APPLICANTS PRIVACY NOTICE

Data controller: Thames Hospice

Data protection officer: Juliana Luxton (dataprotectionofficer@thameshospice.org.uk)

Thames Hospice collects, stores and processes personal information about prospective, current and former staff including applicants, employees, (and former employees) and workers to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information do we collect?

We collect and process a range of information. This includes:

- Name, address and contact details, including email address and telephone number, date of birth and gender.
- The terms and conditions of employment.
- Details of qualifications, skills, experience and employment history, including start and end dates, with previous employers and any references received.
- Information about remuneration, including entitlement to benefits such as pensions or insurance cover.
- Details of bank accounts and national insurance numbers.
- Information about marital status, next of kin, dependants and emergency contacts.
- Information about nationality and entitlement to work in the UK.
- information about any criminal records;
- Details of days of work and working hours and attendance at work.
- Details of periods of leave, including holiday, sickness absence, and other leave and the reasons for the leave.
- Details of any disciplinary or grievance procedures, including any warnings issued and related correspondence.
- Assessments of performance, including appraisals, performance reviews, training, performance improvement plans and related correspondence.
- Information about medical or health conditions, including disabilities for which we need to make reasonable adjustments.
- Equal opportunities monitoring information, including information about ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways. For example, data is collected through application forms or CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments.

In some cases and with your consent we collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks where applicable and permitted by law.

Data is stored in a range of different places, including in your personnel file and in our HR management systems

Why do we process personal data?

We need to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pension and insurance entitlements.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

- Run recruitment processes.
- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights.
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- Operate and keep a record of employee performance and related processes.
- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled.
- Obtain occupational health advice, to ensure that we comply with our duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled.
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled.
- Ensure effective general HR and business administration.
- Provide references on request for current or former employees.
- Maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, are processed for the purposes of equal opportunities monitoring. Data that we use for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

You have some obligations under your employment contract to provide us with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide us with data in order to exercise your statutory rights, such as in relation to statutory leave

entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

We recognise the need to treat personal and sensitive data in a fair and lawful manner. No personal information held by us will be processed unless the requirements of fair and lawful processing can be met.

Who has access to data?

Your information will be shared internally, including with members of the HR team and Finance and is controlled and only available on a need to know basis. All staff receive training on the principles of data protection and information security.

We will not forward your personal details to a third party organisation without your consent. Please be assured that any third party organisations that we use/ or have a contract with will not pass on any personal data that we share with them, and we ensure that any third party we use has appropriate data security policy in place.

How do we protect data?

We take the security of your data seriously. We have security procedures and rules to protect your data. Your data will be kept in a secure environment and only accessed by employees in the performance of their duties.

How do you update your data?

We want to make sure that your personal data is accurate and up to date. Please let us know of your details change.

Human Resources, Thames Hospice, Pine Lodge, Hatch Lane, Windsor SL4 3RW, or via e-mail hroffice@thameshospice.org.uk

For how long do we keep data?

We do not keep your data for longer than is necessary for the purposes for which it is processed. We will retain personal data for the minimum period required by legislation, or national guidance provided by statutory authorities. When no longer required for day to day processing, personal information will be archived, either electronically or if in hard copy, stored in a secure archive held offsite and then destroyed when the retention period has ceased.

Your rights

As a data subject, you have a number of rights. You can:

- Ask to be informed why, where and how we use your information.
- Ask for access to your information.
- Ask for your information to be corrected if it is inaccurate or incomplete.
- Ask for your information to be deleted or removed where there is no need for us to continue processing it.
- Ask to restrict the use of your information.
- Ask to copy or transfer your information from IT system to another in a safe and secure way.

- Object to how your information is used.

For more information please contact Juliana Luxton at dataprotectionofficer@thameshospice.org.uk

If you believe that Thames Hospice has not complied with your data protection rights, you can complain to the Information Commissioner.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

If you have any questions about this Privacy Notice please contact Juliana Luxton at dataprotectionofficer@thameshosice.org.uk

If you have any queries about this privacy statement please contact the Thames Hospice Data Protection Lead on 01753 848955. You can see more about what Thames Hospice does with records in our general Privacy Statement, which you can find at: <https://www.thameshospice.org.uk/privacy-and-patient-information>

D - VOLUNTEER PRIVACY NOTICE

Data controller: Thames Hospice

Data protection officer: Juliana Luxton (dataprotectionofficer@thameshospice.org.uk)

Thames Hospice collects, stores and processes personal information about prospective, current and former volunteers to manage the volunteering relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information do we collect?

We collect and process a range of information. This includes:

- Name, address and contact details, including email address and telephone number, date of birth and gender.
- Details of qualifications, skills, experience provided in the application form or during the interview process and any references received.
- Information about and emergency contacts if provided.
- Information about entitlement to volunteer in the UK.
- Information about any criminal records should the role require a DBS check.
- Details of any problem raised either about the volunteer or by the volunteer and copies of related correspondence.
- A record of training completed by the volunteer.
- Information about medical or health conditions, including disabilities should the volunteer make us aware of them.
- Equal opportunities monitoring information if provided by the volunteer, including information about ethnic origin, health and religion or belief.

We collect this information in a variety of ways. For example, data is collected through application forms; enquiry forms; through documents submitted as part of the DBS check process; the Equality & Diversity Monitoring Form, parental consent forms or through your informal interview.

In some cases and with your consent we collect personal data about you from third parties, such as references and information from criminal records checks where applicable and permitted by law.

Data is stored in a range of different places, including on our Volunteer Database System and paper files stored securely at Pine Lodge.

Why do we process personal data?

We need to process data to understand who Thames Hospice volunteers are, to ensure we are providing the right training, making reasonable adjustments wherever possible, to check that a volunteer has the right to volunteer in the UK and to comply with health and safety laws. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the volunteering relationship. Processing volunteering data allows us to:

- Run recruitment processes.
- Maintain accurate and up-to-date volunteering records and contact details (including details of who to contact in the event of an emergency).
- Operate and keep a record of problem solving processes, to ensure acceptable conduct and to improve our practices.
- Ensure effective general Volunteer Services and business administration.
- Provide references on request for current or former volunteers.
- Maintain and promote equality in the organisation.

Special categories of personal data, such as information about ethnic origin, health or religion or belief, are processed for the purposes of equal opportunities monitoring. Data that we use for these purposes is anonymised or is collected with the express consent of volunteers, which can be withdrawn at any time. Volunteers are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

We recognise the need to treat personal and sensitive data in a fair and lawful manner. No personal information held by us will be processed unless the requirements of fair and lawful processing can be met.

Who has access to data?

Your information will be shared internally, including with members of the HR and Volunteer Services and is controlled and only available on a need to know basis. All staff and volunteers receive training on the principles of data protection and information security.

We will not forward your personal details to a third party organisation without your consent. Please be assured that any third party organisations that we use/ or have a contract with will not pass on any personal data that we share with them, and we ensure that any third party we use has appropriate data security policy in place.

How do we protect data?

We take the security of your data seriously. We have security procedures and rules to protect your data. Your data will be kept in a secure environment and only accessed by employees in the performance of their duties.

How do you update your data?

We want to make sure that your personal data is accurate and up to date. Please let us know of your details change.

Volunteer Services, Thames Hospice, Pine Lodge, Hatch Lane, Windsor SL4 3RW, or via e-mail volunteers@thameshospice.org.uk

For how long do we keep data?

We do not keep your data for longer than is necessary for the purposes for which it is processed. We will retain personal data for the minimum period required by legislation, or national guidance provided by statutory authorities. When no longer required for day to day processing, personal information will be archived, either electronically or if in hard copy, stored in a secure archive held offsite and then destroyed when the retention period has ceased.

Your rights

As a data subject, you have a number of rights. You can:

- Ask to be informed why, where and how we use your information.
- Ask for access to your information.
- Ask for your information to be corrected if it is inaccurate or incomplete.
- Ask for your information to be deleted or removed where there is no need for us to continue processing it.
- Ask to restrict the use of your information.
- Ask to copy or transfer your information from IT system to another in a safe and secure way.
- Object to how your information is used.

For more information please contact Juliana Luxton at dataprotectionofficer@thameshospice.org.uk

If you believe that Thames Hospice has not complied with your data protection rights, you can complain to the Information Commissioner.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

If you have any questions about this Privacy Notice please contact Juliana Luxton at: dataprotectionofficer@thameshosice.org.uk

APPENDIX 3 – USE OF COOKIES

Use of cookies

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Third Party Cookies

The only third party cookies used on our site are known as 'performance cookies'. These take no personal information, but collect website usage statistics anonymously to help us monitor how our website performs. Anything that is not directly in our website is not applicable to our Cookie Policy.