

Privacy Notice- General

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Document control sheet

Privacy notice – general

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Lead author	<i>David Bland- Associate Director of Data and Systems</i>
Additional author(s)	<i>Sarah Winn- Finance Director</i>
Applies to	<i>Organisation and Community</i>
Approved by, date	<i>Sarah Winn- Finance Director</i>

Change History		
Date	Change details since Approval	Approved by
<i>19/11/2025</i>	<i>Privacy notice updated with more clarity around data processing and sharing, as well as changes inline with the Data Use and Access Act 2025</i>	<i>Sarah Winn- Finance Director + SIRO</i>

Introduction

Hospice in the Weald (HiTW) is a “data controller” and we collate and process information, (referred to as Personal Data) about you. Personal Data means any information which we process which can identify you, for example, your name, email address and contact details.

We also collect and process more sensitive data, referred to within the Data Protection legislation as Special Category Data. Such Special Category Data requires a higher level of protection and may include such information as health-related data and information which will help us to fulfil our service provision with and to you, such as information relating to more personal aspects of your life.

We are registered as a Data Controller with the ICO: Ref ZA103355

Purpose

We recognise the trust placed in us by all of our service users and supporters whose information we collect and process. This privacy notice (together with any other documents referred to in it) sets out the basis on how any personal data we collect from you, or that you provide us, or that we obtain about you will be processed.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are committed to ensuring that we do so in a manner that is lawful and respects your privacy.

Who does this privacy notice apply to

This notice applies to everyone whose data we collect. This includes but isn't limited to Patients, Volunteers, Supporters, Fundraisers, and all those whose data we process for whatever reason.

The Hospice has a responsibility to ensure you are informed about what we collect and how we use the data collected. This notice will provide this for you.

How do we obtain your information

Here are some examples of where we obtain data from and about you:

- When you access our website and engage online
- When you contact us for information, to offer your time or skills as a volunteer
- When you approach us for information about any of the services provided by the Hospice
- If you are referred to us for health-related services by another health care provider
- When you fundraise for us. Sometimes information may also be shared with us by independent event organisers; for example, the London Marathon or fundraising sites like Just Giving. These independent third parties will only share your information with us if you have indicated that you wish to support the Hospice and have given your consent.
- When you buy a product or service, register with a website, or register with a comparison site, you may provide permission for third-party organisations to share your data with other third parties, including charities. The information we get from those services depends on how you have set your privacy settings online or the responses you give if completing a paper form, so you should remember to check them.
- CCTV images from all associated surveillance in and around the Hospice.

It is not the policy of HiTW to collect information by automated means. We do not anticipate that any of our decisions will occur without human involvement. Should we use any form of automated decision in the future making we will advise you of any change in writing.

The Hospice, as a Data Controller, must comply with the seven Data Protection Principles set out in within the data protection legislation. In summary, these state that personal data shall be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').
- Accurate and, where necessary, kept up to date.
- Rectified without delay ('accuracy').
- Kept in a way which permits identification of you for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
- HiTW must also be able to demonstrate compliance with all of the principles above, which covers the requirement for us to be accountable for all processing actions.

Your rights in connection with personal information

All the processing Hospice in the Weald undertakes is regulated by data protection legislation which requires that we adhere to the UK General Data Protection Regulations and the Data Protection Act 2018. This is referred to in this privacy notice as the Data Protection Legislation.

Data Protection Legislation requires that we offer you clear information about our processing and the rights you have. You will find them listed here along with contact details should you wish to request any of these rights be applied.

Data protection principles

Access

You can request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of any of the personal information we hold about you and to check that we are lawfully processing it.

If you make a request, we will respond to acknowledge we have received it. We may ask you about any specific information you are seeking, this will help us make sure we meet your request fully and in a timely way.

Rectification

You can request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Erasure

You can request erasure of your personal information. You can ask us to delete or remove personal information where there is no good reason for us continuing to process it.

There may be reasons why we cannot erase your data and you will be advised if this is the case.

Object

You can object to processing, for instance if you wish to discontinue supporting us, or don't want us to use your data for direct marketing purposes.

Restriction

You can request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information for example if you want us to establish its accuracy or the reason for processing it.

Transfer

You can request the transfer of your personal information to another party.

Automated decision making or profiling

You have the right to know if the Hospice conducts any automated decision making about you based on the data we collect and process. At this stage, we do not perform any such processing. If that changes, you will be made aware of that prior to any implementation.

What personal data do we collect?

When you access any of our health care and support services or support any of the Hospice's activities by fundraising or volunteering, we may collect the following personal data:

- Name, address, date of birth, NHS number and next of kin details.
- Contact details such as telephone numbers and email addresses
- Contacts we have had with you, such as appointments and/or home visits.
- Information about your health, such as details of diagnosis, health conditions, allergies and the treatment and care you have received.
- Relevant information from other health and social care professionals to support the care you receive from us.
- Information relating to your bank account and sponsorship data where relevant.

As a specialist palliative healthcare provider, Hospice in the Weald may also collect sensitive data such as your religious and spiritual beliefs and your racial and ethnic background. This information is used to personalise the care you may receive in a way which will reflect your individualism. We do not usually collect special categories of data about our supporters; however we may collect sensitive data for employees, casual workers, or volunteers as part of our statutory, contractual and management responsibilities.

When you visit the Hospice, or one of our shops, there are surveillance cameras outside and in public places. These record CCTV images for the prevention and detection of crime. The images collected are considered personal data and are retained for 30 days and only accessed should there be a bona fide reason to check the recordings.

Lawful basis for processing your data

The Hospice must have a legal basis to process your information. There are a number of legal bases under which we are permitted to process data of our patients and supporters.

Which legal basis is determined by considering the data and the requirements of the processing. You can ask to have this legal basis clarified, through your right of access.

For personal data the legal basis will be one of the following:

- Article (6)(1)(a) Consent - where you have given clear consent for the Hospice to process your personal data for a specific purpose.
- Article (6)(1)(b) Contract - the processing is necessary for a contract we have with you
- Article (6)(1)(c) Legal obligation - where we must comply with the law, for example gift aid forms.
- Article (6)(1)(d) Vital interests - the processing is necessary to protect someone's life.
- Article (6)(1)(f) Legitimate interests: - the processing is necessary for our legitimate interests, for example keeping is touch regarding events, celebratory gifts, legacy or donation. Unless you have requested that we do not do this.

Article 9 lists the conditions for processing special category data and most frequently will be:

- Article 9(2)(a) Explicit consent - where you freely given clear consent for the processing of the special category personal data for the one (or more) specified purposes.
- Article 9(2)(c) Vital interests - processing of the special category personal data is necessary to protect the vital interests of the data subject where they are physically or legally incapable of giving consent.
- Article 9(2)(d) Not-for-profit bodies - relates to processing carried out by not-for-profit bodies.
- Article 9(2)(h) Health or social care.
- Article 9(2)(j) Archiving, research and statistics – where processing of the data must be a reasonable and proportionate way of achieving archiving, research or statistical purposes, more data than required must not be used and it must be demonstrated that the processing is in the public interest.

What will we do with the information you give us?

How we use your information depends on why you are providing it. We may use your information in the following ways:

- To give you the information, support, services, or products you ask for.
- To gain a full understanding of your situation to provide the best possible personalised services for your specific needs
- To contact you for feedback on our services and events, to better understand your experiences, reflect and improve.
- For administration purposes, recording our relationship with you and ensuring we maintain accurate records of your care.
- For accounting purposes.
- To conduct market research
- For the purposes of employment or volunteering, fulfilling our duties as an employer
- To respond to enquiries, complaints, legal claims or other such issues.
- To conduct statistical analysis and research to help us understand how we are performing and how we might improve our services to better meet the varied needs of our service users and supporters.
- Your information may be used for clinical audit, to check the quality and outcomes of the treatment provided.
- To process and acknowledge your donation, sponsorship, gift aid and payments made online or through our shops
- To collect and process any item donation you make to our shops

- To contact you about making a celebratory gift, donating in memory, leaving a gift in your Will, or to give you details about work activities, events and services.
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- We may also use your personal information for other purposes, which we specifically notify you about and, where appropriate, obtain your consent.

Marketing

The support you provide to the Hospice helps transform the lives of patients with life-limiting conditions and our ability to communicate with you is important to us. We would like to keep you up to date with how your support is helping us provide care to patients and their loved ones within our community. As well as this, we would also like to tell you about the ways you may want to help in the future, including volunteer opportunities, participating in events or fundraising. On occasion, we may send out appeals asking for a donation, to continue to raise the voluntary funding needed for the Hospice.

We will only communicate with you in the way that you wish us to and will always respect your privacy. If you change your mind about the means in which we contact you, or if you don't wish to be contacted any longer, you can send your request to privacy@hospiceintheweald.org.uk or call the Welcome Team on **01892 820500**. We will be sure to update your preferences in a timely manner and if you contact us by email, please ensure you state your full name and address so that we can identify you on our database.

Electronic Mail (Email) Marketing

If you have supported, or shown an interest in, the Hospice's charitable purposes, it's always your decision as to whether we contact you for marketing purposes by email. If at any point you want to stop receiving this, any email you receive from us will include an 'Opt-out' function.

Post / telephone marketing

If you have provided us with your postal address or telephone number, we may send you direct mail or telephone you about our work, unless you have told us that you would prefer not to receive such information or we receive a notification from the Fundraising Preference Service that you have requested marketing communications to stop. We also actively check telephone numbers against the Telephone Preference Service (TPS) and will not contact you via telephone if you have asked us not to.

How we keep your data safe and who has access to it

Processing your information

Your information is held on systems that are maintained and managed securely by us. We ensure that there are technical controls in place to protect your personal details and undertake regular reviews of who has access to your data. We may share your information internally between departments, to ensure your details and preferences remain up to date. We will not sell your information to other charities or organisations.

We ensure your information is only accessible by appropriately trained staff/ volunteers or by processors with whom contracts/formal agreements requiring them to only process your information for the purposes we instruct them to and in a safe manner.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Wherever possible we store all personal data the UK or within the European Union (EU) and if this is not possible,

we ensure that there are contractual clauses in place to ensure the security of your data.

Sharing your Data

Hospice in the Weald does not sell your information to other charities or organisations.

We do use suppliers to help us fulfil registrations, orders and engage with you. We've undertaken due diligence on all these organisations and have entered into contracts/formal agreements requiring them to only process your information for the purposes we instruct them to and in a safe manner. If you sign up to take part in an event that is facilitated, hosted or organised by a third party, Hospice in the Weald may need to share relevant information to ensure your participation.

To ensure continuity of care, Hospice in the Weald may data share with other health and social care organisations. One means that this is facilitated is through the Kent and Medway Care Record (KMCR). The KMCR is an electronic care record which links your health and social care information held in different provider systems, to one platform. This allows health and social care professionals who have signed up to the KMCR to access the most up to date information to ensure you receive the best possible care and support by those supporting you. To enable this sharing of information, organisations who use the KMCR have agreements in place that allow the sharing of personal and special category data. *For further information about the Kent and Medway Care Record and the ways in which your data is used for this system please click [here](#).*

Hospice in the Weald also data share with Medical Examiners to allow an independent scrutiny of death.

Hospice in the Weald will not share your information with any other organisation without your consent, other than under the following circumstances:

- With the organisers of events/campaigns you're registered for as long as it is justified and lawful;
- If we are required to by law e.g. to the police, if we agree it is essential to the prevention or detection of a crime;
- If we feel it is in the vital interests of yourself or another person, for example in a medical emergency or safeguarding emergency.

How long do we keep your personal data

We will only use and store personal information for as long as it is required for the purposes it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we have:

- considered the amount, nature and sensitivity of your personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data
- the purpose for which we process your personal data
- whether we can achieve those purposes through other means, and
- the applicable legal requirements.

Having considered all these factors, the Hospice has adopted the NHS Management Code of Practice for Health and Social Care 2020 guidelines.

You may request a copy of our retention schedule.

Cookies

What are Cookies?

Cookies are small pieces of data which your browser stores on your machine as you use our website. Cookies are sometimes used to provide the user with a tailored experience when revisiting a site e.g., remembering preferences, so you don't have to submit the same information twice.

What Cookies do we use?

We use cookies to identify you as a unique visitor and to identify which pages are being used. The cookie that is stored does not include any information that is personally identifiable to you. The information is completely anonymous.

Third Party requests

These cookies are used to collect information about how visitors use our site, which we use to help improve it. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Making a complaint

We strive 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 it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive details of all aspects of our collection and use of your personal information. However, you may ask us to provide any additional information or explanation needed. We have appointed an Information Governance Lead and Senior Information Risk Owner (SIRO) to oversee compliance with this privacy notice.

If you have any questions about this privacy notice or how we handle your personal information you should contact them by one of the ways listed below.

Contact details

Our registered address is Hospice in the Weald, Maidstone Road, Pembury, TN2 4TA

Our phone number is 01892 820500

HiTW is registered with the Information Commissioner's Office (ICO). Our registration number: ZA103355

We take our duty to protect your personal data and maintain confidentiality very seriously. We are committed to taking all reasonable measures to make sure the personal data we are responsible for, whether in electronic or in paper format, is kept securely.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner's Office; their address is Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by calling 0303 123 1113.