

Willow Wood provides Palliative Care services for patients across Greater Manchester, including inpatient, outpatient and community services. In order for us to provide our services, it is necessary for us to process both personal and confidential information about you. Processing can mean any of the following:

- Collecting
- Accessing
- Recording
- Holding
- Viewing
- Analysing
- Storing
- Adapting
- Altering
- Deleting
- Disclosing

Willow Wood Hospice uses both paper and electronic systems to process the information of our patients, staff, volunteers, donors, supporters and visitors. As an organisation, we comply with the Data Protection Act 2018 and General Data Protection Regulations to ensure that your information is kept secure, that its integrity is maintained and that it is available when we/you need it. In line with the legislation, it is Willow Wood policy to:

- Process your personal information fairly and in accordance with applicable laws;
- Tell you about how we will use your personal information;
- Only collect personal information from you when we need it for legitimate purposes or legal reasons;
- Ensure that your personal information is adequate, relevant and not excessive for the purpose for which we collect it;
- Not keep your personal information for longer than we need to;
- Keep your personal information secure, and limit the people who can access it;
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date; and
- Ensure that any third parties we share your personal information by taking appropriate steps to protect it.

In order to protect the information that we collect, we have developed an Information Governance Management Framework around the 10 National Data Guardian standards. We perform an annual assessment to ensure that our systems meet the same high standard as the NHS (through the Data Security Protection Toolkit). This means that we have:

- Policies and procedures for processing personal and confidential information

- Specified staff responsibilities relating to data security and protection. Data protection and confidentiality clauses are also included in staff, volunteer and third party contracts
- Annual training for all staff relating to data security and protection
- Restricted access to physical and electronic sources of personal information
- Regular audits against our policies and procedures to ensure compliance
- Internal reporting systems to record and react to incidents. Serious incident will be reported to the Information Commissioner's Office
- Continuity planning to ensure that we can retrieve/maintain service levels in the case of an incident or event
- An understanding of and limitation on the number of unsupported systems that we use
- Robust IT protection systems to identify and respond to cyber threats
- Standard contracts to ensure that our suppliers are able to offer the same level of data security and protection as we do

This is our Privacy Notice, which informs you how and why we process your personal information. We will also provide examples of the information, uses and organisations who we work with but please note: the lists are not exhaustive so may change from time to time. Click the relevant links below to find out more, alternatively, you can contact our Information Governance Lead using the following e-mail address: iglead@willowwood.info.

Our Response to the Covid-19 Pandemic

What information do we collect?

As part of our response to the COVID-19 pandemic, we have started to collect your personal data through visitor screening questionnaires, staff and volunteer risk assessments, patient, client, staff and volunteer testing programs and the vaccination program. Details of the information we process include, but are not limited to:

- Your name and contact details e.g. address, phone number and e-mail address
- Your date of birth and ethnicity
- Details of your health status, risk factors and COVID-19 test results/vaccination status

Why do we process your information?

Your information is used to:

- To assess risk to you and others relating to COVID-19
- To support you in the workplace (if you are a member of staff or volunteer)
- To protect our staff and patients (if you visit one of our hospice sites)
- To help support infection prevention and control
- To support the national effort to manage the COVID-19 pandemic

We may also use your information for other purposes:

- To manage and audit our services
- To provide important statistical information to commissioners and partners.
- For research and planning purposes – to support the wider NHS in managing the pandemic.

Please note: Willow Wood will not use your sensitive/personal identifiable information unless it is absolutely essential. This means that when we are processing your information for non-direct care purposes, we will endeavour to either anonymise it which means that all personal identifiable information is removed with no possibility of tracing the information back to you in the future; or pseudonomise it which means that all personal identifiable data is replaced, and highly restricted access is applied to the pseudonimisation code.

We may share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If we receive a formal order from a court acting in their judiciary capacity
- If there is a public health need such as preventing the spread of infectious diseases
- If there is a safeguarding need (vulnerable adults or children)

How do we process your information lawfully?

In the Data Protection Act 2018 and the UK General Data Protection Regulation, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon for the delivery of direct care:

- Public Interest – to process and share personal information in response to the pandemic. This is underpinned by the [Health Service \(Control of Patient Information\) Regulations 2002](#), which allows patient information to be shared in the event of a pandemic.
- To process data in the field of Public Health/Occupational Health – to process your sensitive personal information (e.g. medical information, race, religion) in response to pandemic
- Legal Obligation – to manage our records in line with data protection legislation and NHS Records Management for Health and Social Care 2016.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure compliance with the UK General Data Protection Regulation. Examples of contracted services includes:

- Occupational Health service – we will share staff and volunteer risk assessments, test results and vaccine details with Stepping Hill Occupational Health service to ensure our staff and volunteers are supported appropriately.
- Track and Trace – we will share data with the local government for Track and Trace purposes.
- Continuous Improvement – we work with other healthcare providers e.g. the NHS to help with identifying areas for improvement and future investment.

Patients

What information do we collect?

We collect your information from you and other healthcare providers who may be caring for you, for example your GP or district nurse. We keep records about your treatment and care both on paper and electronically. Details of the information we process include, but are not limited to:

- Your name and contact details e.g. address, phone number and e-mail address
- Your date of birth and ethnicity
- Your medical records including assessments, diagnosis, treatment, services attended, status and care planning
- Your holistic care needs including spiritual, social and psychological
- Information about your next of kin, close family, friends and carers

Why do we process your information?

Your information is used for direct care purposes:

- To assess the suitability of our services for you
- To provide you and the people that care for you with our care and support services
- To ensure that we have a record and that other healthcare providers who are part of your direct care team are kept informed about the services and treatment that has been provided

We may also use your information for purposes that are not related to your direct care:

- To investigate queries, complaints or legal claims
- To manage and audit our services
- To provide important statistical information to commissioners and partners for funding and management purposes
- For research and planning purposes. Your personal information will not be used for this purpose if you have signed up to the National Data Opt Out. For more information, relating to the National Data Opt Out, click the following link:

<https://digital.nhs.uk/services/national-data-opt-out>

Please note: Willow Wood will not use your sensitive/personal identifiable information unless it is absolutely essential. This means that when we are processing your information for non-direct care purposes, we will endeavour to either anonymise it which means that all personal identifiable information is removed with no possibility of tracing the information back to you in the future; or pseudonomise it which means that all personal identifiable data is replaced, and highly restricted access is applied to the pseudonimisation code.

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If we receive a formal order from a court acting in their judiciary capacity
- If there is a public health need such as preventing the spread of infectious diseases
- If there is a safeguarding need (vulnerable adults or children)

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon for the delivery of direct care:

- Public Interest – to process personal information to deliver our care and support services. This is underpinned by the Health and Social Care Act 2012.
- Provision of Health and Social Care Services – to process your sensitive personal information (e.g. medical information, race, religion) to deliver our care services. This performed under our contracts with NHS Clinical Commissioning Groups.
- Legal Obligation – to manage your personal records in line with data protection legislation and Records Management for Health and Social Care 2016.
- Consent – when you join one to one or group video consultation sessions.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Data Management – all patient health records and related reporting/correspondence are managed through an electronic database called EMIS Web, which is used widely across the healthcare sector. This is the same system used by most GP practices in Greater Manchester.
- Record Retention – Paper copies of medical records are archived securely at the hospice.
- Incident Reporting – all incidents are recorded used our internal procedures.
- Insurance Claims – we work with a company called TowerGate to manage insurance claims.
- Audits – we work with other organisations who help us audit our systems to ensure that we are complying with our legal, regulatory and internal requirements. For example, the Care Quality Commission and Moss & Williamson.
- Continuous Improvement – we work with other healthcare providers e.g. the NHS to help with identifying areas for improvement and future investment.

- Video Consultations – we use software provided by AccuRX to hold one to one video consultations with our patients.
- Group Video Classes – we use web-based applications to provide group video conferencing, for example, FaceTime and Microsoft Teams. The third-party organisations will process your personal information to provide the video conferencing services and may collect your information for their own legitimate interests. More detail can be found in the service provider’s Privacy Notices.

Clients

What information do we collect?

We collect your information from you, your family members, close friends and carers who attend our services, for example, you may be listed as Next of Kin or an Emergency Contact. We keep records about you and our contact with you both on paper and electronically. Details of the information we process include but are not limited to:

- Your name and contact details e.g. address, phone number and e-mail address
- Your date of birth and ethnicity
- Your notes and reports from services that you have attended
- Information about your next of kin, close family and friends

Why do we process your information?

Your information is used for support purposes:

- To invite you to use our family, friends and carer support services
- To provide you with our family, friends and carer support services
- To ensure that we have a record of our sessions for your continued support

We may also use your information for purposes that are not related to your support:

- To investigate queries, complaints or legal claims
- To manage and audit our services
- To provide important statistical information to commissioners and partners for funding and management purposes.
- For research and planning purposes. Your personal information will not be used for this purpose if you have signed up to the National Data Opt Out. For more information, relating to the National Data Opt-Out, click the following link:

<https://digital.nhs.uk/services/national-data-opt-out>

Please note: Willow Wood will not use your sensitive/personal identifiable information unless it is absolutely essential. This means that when we are processing your information for non-direct care purposes, we will endeavour to either anonymise it which means that all personal identifiable information is removed with no possibility of tracing the information back to you in the future; or pseudonomise it which means that all personal identifiable data is replaced, and highly restricted access is applied to the pseudonimisation code.

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If we receive a formal order from a court acting in their judiciary capacity
- If there is a public health need such as preventing the spread of infectious diseases
- If there is a safeguarding need (vulnerable adults or children)

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon for the delivery of our support services:

- Public Interest – to process personal information to deliver support services. This is underpinned by the Health and Social Care Act 2012.
- Provision of Health and Social Care Services – to process your sensitive personal information (e.g. medical information, counselling notes, race, religion) to deliver our support services to you. This performed under our contracts with NHS Clinical Commissioning Groups.
- Legal Obligation – to manage your personal records in line with the Records Management for Health and Social Care 2016.
- Consent – when you join our one to one, or group video consultation sessions.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure

compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Data Management – all client records and related reporting/correspondence are managed through an electronic database called EMIS Web, which is used widely across the healthcare sector. This is the same system used by most GP practices in Greater Manchester.
- Record Retention – paper copies of records are archived securely at the Hospice.
- Incident Reporting – all incidents are recorded used our internal procedures.
- Funding – we work with other organisations to facilitate generating funds for you and the care that you receive for example, Local Authorities and Special Palliative Care nurses.
- Continued Care – we work with other healthcare providers and Local Authorities to ensure continued care.
- Continuous Improvement – we work with other healthcare providers e.g. the NHS to help with identifying areas for improvement and future investment.
- Insurance Claims – we work with a company called TowerGate to manage insurance claims.
- Audits – we work with other organisations who help us audit our systems to ensure that we are complying with our legal, regulatory and internal requirements. For example, the Care Quality Commission and Moss & Williamson.
- Video Consultations – we use software provided by AccuRX to hold one-to-one video consultations with our clients.
- Group Video Classes – we use web-based applications to provide group video conferencing, for example, FaceTime and Microsoft Teams. The third-party organisations will process your personal information to provide the video conferencing services and may collect your information for their own legitimate interests. More detail can be found in their Privacy Notices.

Health and Social Care Data Sharing

Willow Wood Hospice shares personal information with other NHS organisations, non-NHS organisations and Local Authorities who are involved in providing health and social care to you. By sharing information in this way, we are able to work as multi-disciplinary teams to ensure that your health and social care needs are being met.

When we plan to share large amounts of sensitive personal information with other organisations, we complete a thorough Data Protection Impact Assessment. Willow Wood will only commence sharing your information once a data-sharing agreement is in place and we have assurance that the other organisation is able to offer the same high level of protection for your information as we do. If during the impact assessment process, we are unable to mitigate against a high risk to the security of your information, we will submit the assessment to the Information Commissioner's Office for assessment and will not progress until our planned activities have been approved.

An example of how data is shared between health and social care networks is through the Greater Manchester Care Record. More information about the Greater Manchester Care Record can be found here: <https://healthinnovationmanchester.com/thegmcarerecord>

A copy of the Greater Manchester Care Record Privacy Notice can be found here: <https://healthinnovationmanchester.com/the-gm-care-record-privace>

Staff, Volunteers, Trustees and Contractors

What information do we collect about you?

When you apply for a role (staff, volunteer, trustee, bank or contract) at Willow Wood, we can collect your information from a number of sources. This will depend on how you have submitted your interest in working with us. The source of your information can be you, an online job website that you have signed up to, your recruitment consultant or referees that you have supplied for your application. We will keep records of your application and personal information in paper and electronic forms. Details of the information we process include, but are not limited to:

- Name and contact details e.g. address, telephone number and e-mail
- Education and employment history
- References and their contact details

If your application is successful, a copy of your application, supporting information and interview notes will be included in your HR file. At the time of job offer, we will also collect further information from you and hold it on your HR file, for example:

- Forms of Identification
- Proof of eligibility to work in the UK
- Disclosure and Barring Service Checks

- Credit and Fraud Checks
- Occupational Health Assessments
- Driving licence, vehicle registration and insurance documents
- Equal Opportunities information
- Emergency contacts
- Bank details
- National Insurance / Social Security Numbers
- Pension details

At the start of your employment/service, you may be assigned user accounts that are required for your role; logs of your account details and some activities within systems will be held by Willow Wood relating to your:

- E-mail accounts
- Telephone numbers
- Application software accounts
- Hardware assigned

During the term of your employment/service, information will be added to your HR records relating to your attendance, occupational health, professional development, performance management and conduct (including findings from investigation/grievance/disciplinary events should they occur).

Why do we process your information?

Your information is used for administration, management and organisational purposes, for example:

- To keep a record of your application process, including screening and interviews to assess your suitability for the role and right to work in the UK
- To be able to contact you throughout your application and term of employment/service
- To send your contract and other necessary correspondence
- To provide you with access to systems that are needed for your role
- To be able to contact someone in the case of an emergency
- To arrange workplace rotas
- To pay you and provide you with benefits (if applicable)
- To record your development, training, qualifications and professional registrations
- To review your performance against organisational objectives
- To provide any necessary support that you may need in order to perform your role
- To perform budgeting and other general workforce management activities

We also need to process your information to ensure that we are complying with our legal obligations as an organisation, for example:

For proof of eligibility to work in the UK

- To ensure the safety and security of our patients, staff/volunteers and the organisation, as we are working with vulnerable individuals
- For financial audit purposes in line with the Companies Act 2006
- For taxation purposes
- For insurance purposes
- For compliance with the Equality Act 2010

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If there is a need to protect and safeguard vulnerable children and adults
- If we receive a formal order from a court acting in their judiciary capacity

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Contract – to provide you with an employment contract.
- For the assessment of your working capacity and occupational health in line with our contracts with NHS Clinical Commissioning Groups.
- Consent – to process your personal information when you apply to/and volunteer for Willow Wood Hospice.
- Legal Obligation –
 - To ensure all staff are eligible to work in the UK in line with the Home Office Code of Practice on Preventing Illegal Working 2019
 - To ensure compliance with the Safeguarding Vulnerable Groups Act 2006
 - To ensure compliance with the Income Tax Act 2007
 - To ensure compliance with the Companies Act 2006
 - To ensure compliance with the Equality Act 2010
 - To manage your personal records in line with the Records Management for Health and Social Care 2016.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Occupational Health – we will work with Tameside General Hospital for Occupational Health services to ensure that our staff are happy, healthy and supported in the workplace.
- HR Services – SMI is used to store personal information, manage annual leave and attendance.
- Staff Conduct Checks – we work with the Disclosure and Barring Service during the recruitment process for the assessment of applicants. The hospice renews the checks every 3 years for staff and volunteers.
- Payroll and other payments – Sage Payroll is used to process your monthly payments.
- Life Insurance – we work with AIG Ellipse to provide you with Life Insurance.
- Insurance Claims – we work with a company called TowerGate to manage insurance claims.
- Audits – we work with other organisations who help us audit our systems to ensure that we are complying with our legal, regulatory and internal requirements. For example, Moss & Williamson.
- Financial Auditing – Moss & Williamson perform annual financial audits, which include auditing Payroll accounts. You can access a copy of our Service Agreement by contacting: jglead@willowwood.info
- Employment Services – we sometimes work with ACAS to resolve disciplinary, grievance or other employment-related disputes.
- Training – we work with a learning provider for mandatory training called Nimble. Staff also access NHS mandatory training through an online database called Moodle.
- Pensions – we work with other organisations to enrol you in pension schemes, for example, NHS pension and Standard Life.
- Incident Reporting – all incidents are recorded used our internal procedures.
- Remote Working – we work with other organisations to provide you with the ability to work remotely, for example, WatchGuard.

Student Placements and Course Attendees

What information do we collect about you?

When you apply to attend a course or placement at Willow Wood, we can collect your information from a number of sources. This will depend on how you have submitted your interest in the courses or placements that we offer. The source of your information can be you, your organisation, school or referees that you have supplied for your application. We will keep records of your application and personal information in paper or electronic forms. Details of the information we process include but are not limited to:

- Name and contact details e.g. address, telephone number and e-mail
- Contact details for people within your education services or employment
- Employment and Education information
- References and their contact details
- Disclosure and Barring Service Checks
- Medical questionnaire
- Emergency contacts

Why do we process your information?

Your information is used for administration, management and organisational purposes, for example:

- To keep a record of your attendance and provide you with certificates and course evaluation material
- To be able to contact you throughout the course or placement
- To be able to contact someone in the case of an emergency
- To record your development, training, qualifications and professional registrations
- To provide any necessary support that you may need in order to access and complete the course or placement

We also need to process your information to ensure that we are complying with our legal obligations as an organisation, for example:

- To ensure the safety and security of our patients, staff/volunteers and the organisation, as we are working with vulnerable individuals

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If there is a need to protect and safeguard vulnerable children and adults
- If we receive a formal order from a court acting in their judiciary capacity

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Contract – to provide you with a placement or course.
- For the assessment of your working capacity and occupational health in line with our contracts with NHS Clinical Commissioning Groups.
- Legal Obligation – to ensure compliance with the Safeguarding Vulnerable Groups Act 2006

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some of our training and development services. All third party contracts are assessed to ensure compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Online training modules – we work with a learning provider for training called e-Learning for Healthcare (e-LfH). Staff also access NHS mandatory training through e-LfH.
- External training – we work with other organisations who provide training in areas that we are unable to deliver in house.
- Incident Reporting – all incidents are recorded used our internal procedures.

Enquires, Donors and Supporters

What information do we collect about you?

We collect your personal information when you ask about our activities, take part in our events, make donations and sign up to our newsletters and updates. We may also collect information about organisations and prospective contacts from publicly available sources of information. We will keep records of your personal information in paper or electronic forms. Details of the information we may process include, but are not limited to:

- Name, address, telephone number, email address, age and gender
- Dietary Requirements (if applicable to the event)
- Payment information and donation history
- Records of consent and correspondence between you and Willow Wood

- Photographs, quotes, or video footage when you have taken part in our events

Please note: Willow Wood will collect children's data with the consent of a parent or guardian and will only correspond with the parent or guardian. The information of children will not be shared and we do not correspond with children under the age of 16.

Why do we process your information?

The information that you provide is used for our fundraising activities:

- To manage the fundraising event or campaign
- To keep a record of who has signed up to our events
- To provide relevant information and resources to participants
- To provide a safe environment for our events to take place
- To process income from the events

We may also process your information for purposes that are not linked to fundraising:

- To claim gift aid on donations from the HMRC with your consent
- To keep current and potential supporters informed about fundraising and events that may be of interest to you
- Where you have provided consent, we may use photographs, videos and quotes of/from you to publicise the Hospice and our activities:
- To keep a log of supporter preferences to help us understand specific interests and trends in monies raised
- To provide a transparent audit trail for income received in line with the Fundraising Regulations for the receipt of income

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If there is a need to protect and safeguard vulnerable children and adults
- If we receive a formal order from a court acting in their judiciary capacity

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long

as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Contract – to process your information in order to perform our contract with you, for example when you sign up to our fundraising events or make a donation.
- Legitimate interest – to process your data to support the fundraising activities of the organisation, for example when we contact you to keep you updated about new fundraising events. You have the right to object to this type of processing.
- Legal obligation – to comply with the law, for example when we keep a record of donations and Gift Aid for the purpose of financial audit in line with The Companies Act 2006.
- Consent –
 - To send you information relating to our fundraising via electronic means, in line with Privacy and Electronic Communications Regulations.
 - To apply for Gift Aid against your donations.

Please note: If you have given consent you have the right to withdraw that consent at any time, this will not affect the legality of activities that used the information before the withdrawal.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Event Sign-up – we work with organisations to advertise/market our fundraising activities and provide registration facilities, for example 123Formbuilder.
- Event Management – we work with organisations who help us to put on a variety of fundraising events, examples include Extreme Adventures, Tour de Manc and Skyline.
- Virtual Events – we work with organisations who help us provide online fundraising events like quizzes, for example Zoom and Virtual Balloon Race.
- Data Management – all donor/supporter information and correspondence are managed through an electronic database called Donorflex, which used by a number of charitable organisations.
- Mailing and Marketing – we use mailing houses to distribute our event registration packs, Friends Newsletter and other communications, for

example Gecko and NRG Mail. We also use e-mail marketing systems for example, Mailchimp and Into Blue, and printing companies who on occasion receive our print files to make materials for promotional and other purposes, for example Prontaprint, Renbrand, and Leaflet Frog.

- Running Appeals – we work with organisations who provide us with resources for collection tins and online dedications/donations, for example Facebook Donate, Thyngs, Minted Box,
- Just Giving, Everyday Hero, MuchLoved, PayPal Giving , Virgin Money Giving and Easy Fundraising.
- Payment Processing – we work with organisations to process payments for donations for example, PayPal, Stripe, SagePay, WorldPay Liberty Pay, AIB Merchant Services and Secure Collections
- Research – we also work with organisations to analyse information related to income generation. In some cases, the information may be entered into specialist software systems that will perform statistical analysis to help us:
 - Identify our most popular events
 - Understand our revenue generation streams
 - Forecast for future campaigns

Lottery Members and Trading Company Customers

What information do we collect about you?

We collect your personal information when join our lottery and buy items from our shops or online platforms. We will keep records of your personal information in paper or electronic forms. Details of the information we may process include, but are not limited to:

- Name, address, telephone number, email address, date of birth
- Payment information
- Records of consent and correspondence between you and Willow Wood

Why do we process your information?

The information that you provide is used to provide you with goods and services:

- To enter you into our Lottery draw
- To sell and deliver items from our online sales and charity shops
- To collect items that you have kindly donated
- To process income from your lottery membership and purchases
- To inform of other associated services

We may also process your information for purposes that are not linked to good and services:

- To provide a transparent audit trail for income received
- To claim gift aid on income received from the HMRC with your consent
- To ensure compliance with the Gambling Commission
- To keep a log of customer preferences to help us understand specific interests and trends in monies raised
- To keep current and potential supporters informed about new goods and services

We may also share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If there is a need to protect and safeguard vulnerable children and adults
- If we receive a formal order from a court acting in their judiciary capacity

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Contract – to process your information in order to perform our contract with you, for example when you sign up to our lottery or buy goods/services from us.
- Legal obligation – to comply with the law, for example when we keep a record of donations and Gift Aid for the purpose of financial audit in line with The Companies Act 2006.
- Consent – to apply for Gift Aid against your donations.

Please note: If you have given consent you have the right to withdraw that consent at any time, this will not affect the legality of activities that used the information before the withdrawal.

Which other organisations do we work with?

In order for Willow Wood to operate, we need to engage with other organisations for the provision of some services. All third party contracts are assessed to ensure compliance with the General Data Protection Regulations. Examples of contracted services includes:

- Lottery Sign-up – we work with organisations to advertise/market our goods and services, and provide registration facilities, for example LPS, SEC and Integrated Promotions.
- Data Management – Lottery memberships and the draw are managed through an electronic database called Carn, which used by a number of charitable organisations.
- Online Trading – we work with eBay, Amazon and Discogs to sell goods for income generation.
- Delivery of goods – we work with Royal Mail, DHL and UKMail to deliver goods to you.
- Trading in our shops – we use a till system called Chariot to process and record sales.
- Payment Processing – we work with organisations to process payments for donations for example, PayPal, Stripe, SagePay, WorldPay, Liberty Pay, AIB Merchant Services and Secure Collections

When you come to Willow Wood Premises

What information do we collect about you?

When you come to any of the Willow Wood sites as a member of staff, volunteer, trustee, contractor, client, student/trainee or guest/visitor you will be required to complete a signing in book to register your attendance. Personal information that we will collect will include:

- Name
- Car registration
- CCTV video recordings*

**We operate CCTV systems in areas that are used by staff and areas that are used by members of the public, there are notices displayed to inform the subjects of the recording.*

Why do we process your information?

The information that you provide is used for ensuring the safety and security of our patients, staff, volunteers, visitors and property, and to facilitate the detection and prevention of crime.

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long

as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Legitimate interest –
 - To help us ensure the safety of our patients, staff, volunteers, visitors and property, and to facilitate the detection and prevention of crime.

Which other organisations do we work with?

We may share your information with other organisations when we are required to do so by law, for example:

- If we are sent a request from the Police under the Crime and Disorder Act 1998
- If we receive a formal order from a court acting in their judiciary capacity

You have the right to see CCTV images of yourself and be provided with a copy subject to certain criteria. We will not release images of other people to you. If you are involved in an incident whilst on our premises, we will record details of the incident in an electronic database which is hosted internally.

Visitors to our Website and Social Media Sites

What information do we collect about you?

In order for us to provide a high-quality website and social media service, Willow Wood needs to collect and process personal information about you, for example:

- Cookies – the name of the domain from which you access the Internet, the date and time you access our site, and the Internet address of the website from which you linked to our site
- Your name and contact details, and other persons involved in queries/correspondence
- Your name and contact details, and other persons involved in complaints

Why do we process your information?

We will use your information to provide a relevant and efficient web and social media service:

- Cookies measure the number of visits to the different sections of our site, and to help us make our site more useful to visitors. Guidance for

managing cookies through your browser can be found at the following website: <https://www.aboutcookies.org>

- To correspond with you relating to your query or complaint

How do we process your information lawfully?

In the Data Protection Act 2018 and the General Data Protection Regulations, processing of your personal information must be done fairly, lawfully and transparently. Willow Wood will only process information relating to you as long as there is a lawful basis in line with the legislation and it is necessary for us to do so. The following legal bases are commonly relied upon:

- Legitimate interest –
 - To process your data to help us improve our website and social media sites
 - To respond to your queries or complaints

Which other organisations do we work with?

In order for Willow Wood to operate our website, we need to engage with other organisations for the provision of:

- Website Publishing – we use an organisation called Frank Design Ltd to publish the content of our website.
- Website and Social Media Monitoring – we work with Google Analytics, Twitter Analytics and Facebook Analytics to collect standard user and internet log information and details of visitor behaviour patterns. You cannot be identified from this information.
- Website Maintenance – we work with Frank Design Ltd to maintain the website; this includes:
 - Daily back-ups of the site
 - Ever-cache technology: proprietary caching technology for massive scalability and speed
 - Firewall protection: multiple powerful firewalls between our data and threats

Please note: From time to time our website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s). We encourage you to read the privacy statements on the other website(s) you visit.

Transferring your information outside of the European Economic Area

It is not common practice to transfer any information to countries outside the UK. If your information is to be sent outside of the European Economic Area, we will only do so once we have confirmation that the recipient is subject to equivalent data protection legislation, and that your information will remain secure. Additionally, there will always be a Data Processing contract in place, which will specify what the data is to be used for.

How long will Willow Wood retain your information

At Willow Wood we will only retain your information for as long as we need it. We have three records management policies in place that are read alongside each other:

- Records Management Policy based on the NHS – Records Management for Health and Social Care 2016 guidelines – for detail of the healthcare retention schedules that we follow, please click the below link:

<https://digital.nhs.uk/binaries/content/assets/legacy/excel/o/o/rmcop-retention-schedules.xls>

- Policy for Fundraising and Marketing Records Management
- Policy for the Management of Employee Records

Your Rights

Under the Data Protection Act 2018 and the GDPR, you have the following rights relating to personal information that we process about you:

- Right to Access (Subject Access Request / Access to Health Records)
- Right to Rectification
- Right to Erasure (Right to be forgotten)
- Right to Object
- Right to Restrict Processing
- Right to Data Portability
- Right not to be subject to automated decision making including profiling

** Please note: not all rights may apply to your individual circumstances. An example of this could be when you would like to have your records erased, but they have been collected in order to meet a legal obligation, or if you request access to records that would cause serious physical or mental harm to you or others.*

Contact Us

If you would like to exercise any of your rights or you would like further information relating to data protection, please contact:

Information Governance Lead

Willow Wood hospice

Willow Wood Close

Ashton-under-Lyne

Lancashire

OL6 6SL

Telephone: 0161 330 1100

Email: iglead@willowwood.info

Website: <https://www.willowwood.info>

The Information Commissioner's Office

The supervisory authority for data protection in the United Kingdom is the Information Commissioner's Office (ICO). If you would like to see our registration with the ICO, enter the following registration codes into the website:

- Z6221064 for our Hospice processing activities
- Z7059700 for our Trading Company processing activities

If you would like further information relating to data protection or would like to lodge a complaint, you have the right to contact the ICO at the following address:

The Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

Website: www.ico.org.uk