

Privacy Notice

At Highland Hospice, we are committed to protecting your personal information and privacy. We comply with all legislation regarding the collection and use of personal data. This Privacy Notice describes how we collect and use your personal information.

We may update this Privacy Notice from time to time so please check back periodically. We will notify you of significant changes by placing a notice on our website.

If you have any queries about this Privacy Notice, please contact our nominated person responsible for Data Protection who is our Head of People on 01463 243132 or generalenquiries@highlandhospice.org.uk.

Highland Hospice

In this Privacy Notice, 'Highland Hospice' means Highland Hospice (registered as a charity in Scotland, No SC011227 and a company limited by guarantee (SC093464) and/or Highland Hospice Trading Limited (registered company SC110041) and/or Ness Islands Railway Ltd (registered company SC625594), whose offices are at Ness House, 1 Bishops Road, Inverness IV3 5SB. We are registered with the Information Commissioner's Office, registration reference Z691694X.

When We Collect Personal Information

We collect personal information about you when you interact with us (e.g. in person, by phone or online) in order to:

- access one of our care, support or educational services
- be acknowledged as the next of kin of one of our service users
- apply to work or volunteer with us
- enquire about our activities and services
- make a donation
- participate in an event
- donate to our shops or warehouse
- buy from our online shop

We may also receive information about you from third parties that we work with or support, for example the NHS, The Highland Council, GPs, our service users, Local Hospice Lottery, JustGiving, pension providers or Disclosure Scotland.

The Personal Information We Collect

People who are supported by our services and those who are important to them

The types of information we might collect include names, postal addresses, email addresses, phone numbers, date of birth and next of kin as well as information of a medical and personal-sensitive nature.

This information is collected for the purposes of providing care services to those referred to us and could be used and shared between departments within the

organisation as well as with other health and social care service providers under strict guidelines. We may also receive further information from the NHS or The Highland Council which is only shared with us under strict guidelines and where information sharing could improve the delivery of care or is necessary for direct care.

We may also use more sensitive types of personal information, including information about racial or ethnic origin; religious or philosophical beliefs; health or sexual orientation.

People Engaging with Knowledge Exchange Services

We may collect names, work and personal e-mails and work addresses

Employees and Volunteers

The types of information we might collect include your name, postal address, email address, phone numbers, date of birth, next of kin, employment history, health relevant to your employment or volunteering role, bank details, NI number and character or employment references.

We may also use more sensitive types of personal information, including information about racial or ethnic origin; religious or philosophical beliefs; or sexual orientation for statistical and reporting purposes but these will be anonymised and no individual will be identifiable.

Supporters

The types of information we might collect include your name, postal address, email address, phone numbers, date of birth, next of kin, communication preferences, credit or debit card details, and whether you are a tax payer so that we can claim Gift Aid. We also hold records of your donations and fundraising efforts alongside the communications that we have had with you.

We will not store credit or debit card details after they have been processed.

We do not collect more sensitive types of personal data such as race or disability, about our supporters unless there is a legitimate reason for this (e.g. if you participate in an event for which we may need to provide support.)

Individuals Captured by CCTV

Highland Hospice has CCTV in operation at our retail warehouse and at Highland Hospice in Inverness. CCTV will capture images in real time wherever the cameras are pointed. These cameras may capture footage of you whilst you are on or close to the premises. Cameras have been situated outside the buildings. There are signs in place to inform you where cameras are in use.

We may collect static and moving images of people. We do not deliberately set out to capture any special category personal data. However, cameras may incidentally record information which falls within these categories. Additionally, footage cameras may be used as evidence regarding criminal offences or related security measures.

Lawful Basis and Purpose

People who are supported by our services and those who are important to them

The lawful basis for processing this data is the legitimate purpose of providing a health and social care service. Special category data held on people we support is processed for the purposes of providing a health and social care service.

If you, a relative or a friend, are cared for or supported by Highland Hospice, the personal-sensitive information you provide to us will be used only for the purposes of offering access to and providing you with services including bereavement support, for training our staff or for monitoring the volume and quality of our services. Highland Hospice will not disclose your personal information to any third party without your consent, except in the following circumstances:

- to health and social care professionals and organisations involved in the provision of your care, and always within the appropriate regulations governing sharing of your health and social care records.
- to the NHS Scotland Information Services Division as part of a statutory return on our activity.
- exceptionally, to professional bodies or otherwise as required by law, regulation or codes of practice
- from time to time, Highland Hospice may participate with partners in research projects for the furtherance of work in the field of palliative care. We will only ever use data with the explicit consent of the individual.

We will not use your information for other purposes without your permission. If you tell us about your own experience with terminal illness or the experience of someone else we will explain how we will use that information. If you don't want us to use such information for other purposes or change your mind at any time, it will not affect any services we provide.

If you receive education, training or mentoring we will use your personal details only for the purposes of offering access to and providing you with such services.

People Engaging with Knowledge Exchange Services

The lawful basis for processing data is for the legitimate purpose of providing training, education, development and knowledge exchange.

We use the information to offer access to and provide you with such services both in person and online.

Employees and Volunteers

The lawful basis for processing this data is the legitimate purpose of managing the relationship between the Hospice and the employee or volunteer.

We use the information collected on our employee and volunteer application forms to identify if you are suitable to work for or volunteer with Highland Hospice. If your application is unsuccessful, we dispose of your data within six months. If your application is successful, we will retain a copy of your application form and your data will be stored electronically to allow us to manage the employment or volunteering relationship we have with you.

In addition, we seek the consent of volunteers working in specified services to share their data with other care professionals, to enable the support of individuals receiving support from the Hospice.

If you cease to be employed by Highland Hospice we will retain your personal data for a period of **six years**.

If you cease to volunteer with Highland Hospice we will retain your personal data for a period of **six years**.

Supporters

The lawful basis for processing data held is the legitimate purpose of raising charitable funds to support the delivery of a health and social care service in the Highlands. If for a **period of two years** you stop making donations we only process your data with your consent.

We use the personal information collected from you for a number of purposes, including:

- to provide you with services, products or information you have requested;
- to process and acknowledge donations or payments we have received from you;
- to fulfil sales made online or through our shops;
- to record and administer your participation in events for which you have registered;
- to record your gifts of money or the sale of goods you donated to our shops and, if appropriate, to reclaim tax paid on these through the Gift Aid scheme;
- to keep a record and breakdown of our fundraising income which we may analyse to help us improve income in future years;
- for a period of **two years** following your most recent donation to send you newsletters and fundraising information unless you choose not to receive these. If a period of **two years** passes without a donation we will only continue to mail you with your consent (see section on 'Your Updates and Preferences' below).

We may also use your details:

- to invite voluntary participation in research or surveys;
- to analyse and improve our work, services, activities, products or information (including our website) or for our internal records;
- for fraud prevention, credit risk reduction or otherwise as required by law or regulation;
- to improve our communication with you and to contact you in the most appropriate and relevant way.

When you use our secure online donation or payment pages you will be directed to a specialist supplier company, who will receive your credit card number and contact information to process the transaction. We do not retain your credit or debit card details.

We use external companies to help us with larger mailings and to process Direct Debits, these companies are UK based and are data protection compliant. If you complete a Gift Aid declaration we will share your name and address and the value of your donations with HMRC for the purposes of reclaiming tax paid.

Individuals captured by CCTV

The lawful basis for processing your personal data is that we have a legitimate interest in using this information to ensure the health, safety and security of supporters, employees and volunteers. This will contribute to the detection, prevention and reduction of incidences of crime, to prevent and respond effectively to all forms of possible harassment and disorder, to create a safer environment and to assist with health and safety and other serious occurrences.

CCTV data is held for a period of 1 month.

Your Updates and Preferences

It is important that we keep your personal information up to date. You can contact us on 01463 243132 or generalenquiries@highlandhospice.org.uk at any time if your circumstances change.

For our legitimate fundraising purposes we will mail you newsletters and fundraising information for a **period of two years** following your latest donation. If a period of **two years** passes without a donation we will contact you to provide an option to consent to continue to hear from us. Any consent provided will be valid for a period of **five years** without a donation.

You can stop receiving mail at any time by contacting the Fundraising Team on 01463 243132 or generalenquiries@highlandhospice.org.uk.

You can stop receiving emails or texts by clicking on the “unsubscribe” link in our marketing emails or sending us an “opt out” text message.

You can update your contact preferences by contacting the Fundraising Team on 01463 243132 or generalenquiries@highlandhospice.org.uk.

We will not use your details for fundraising or related purposes if you tell us not to, however, we will retain your details on our database to help ensure that we do not contact you again.

Sharing with Third Parties

We will never sell your data to any third party. We will not share your details with other charities for marketing purposes.

We will only share information with other organisations where we have your permission to do so in accordance with this Privacy Notice, where it is necessary for a legitimate reason connected with the services we offer or where it is required by law or regulation.

Sometimes, we may need to share your information with a small number of trusted partners (service providers, agents and affiliated companies) for the purposes outlined above (e.g. a supplier that produces promotional material or delivers goods for us or a supplier that processes payments securely). Where we use third parties, we require them to adhere to appropriate controls to protect personal information.

We use Microsoft Office 365, Cybertill, SMI Staffcare, SPARK, Salesforce, Talos360, Raiser’s Edge, Vantage and OASIS which are multi-tenant cloud services, to store data. This means that internal documents and information which are generated at Highland Hospice are stored in cloud services which are hosted within the European Economic Area (EEA).

Our Volunteer and Helping Hands client data is stored on a multi-tenant cloudservice called Better Impact. The Better Impact servers are based in Canada and so your personal data will be stored and accessed by us in Canada. The European Commission has determined that data storage in Canada offers an adequate level of data protection.

Vantage is used to record incidents, complaints and compliments. Whilst the majority of data is stored within the UK and the European Economic Area (“the EEA”), some or all of your data may be stored outside of the EEA. You are deemed to accept and agree to this by using Vantage. If data is stored outside the EEA, Vantage

Technologies will take all reasonable steps to ensure that data is treated as safely and securely as it would be within the UK and under the GDPR guidelines. CCTV footage is stored on a local recorder in the UK.

Learnpro which is our Learning Management System is stored on a multi-tenant cloud service. Where data is transferred out of the EEA, Learnpro ensure a similar degree of protection is afforded to it.

We may, on an exceptional basis, use other tools or services which process data outside the EEA. In these cases we require suppliers to ensure adequate protection for personal data e.g. Microsoft may provide us with emergency support for Office 365 from outside the EEA in rare circumstances.

Transferring personal information abroad

It is sometimes necessary to transfer personal health information overseas, for example if you require urgent medical treatment abroad. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with guidance from the Information Commissioners Office or Highland Hospice Policies.

Data Security

Highland Hospice is committed to keeping your personal information safe and secure and we have security policies and technical measures in place to help protect your information.

Unfortunately, no data transmission over the internet can be guaranteed 100% secure. As a result, while we strive to protect your personal information, Highland Hospice cannot ensure or warrant the security of any information you transmit to us, and you do so at your own risk.

As a user you can help protect the integrity of any data you transmit to Highland Hospice by taking common precautions such as regularly allowing patching for your operating system, ensuring you are running up to date and supported anti-virus software, and only transmitting data where HTTPS appears at the beginning of the page URL (this refers to the security technology Secure Sockets Layer (SSL) and indicates that the data is being transmitted securely).

Your Rights

You have the following rights with regard to the data we store about you:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erase
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling (we do not use automated decision making or profiling).

If you wish to exercise any of these rights please contact our Head of People on 01463 243132 or generalenquiries@highlandhospice.org.uk for more information.

For more information about your privacy rights or if you are not happy with how we deal with a request relating to your privacy, you can always contact the Information Commissioner's Office (ICO) directly.

Health and Care Record Requests

The Caldicott Guardian, the Head of Hospice Services, is responsible for overseeing the request process and approving the release of information relating to patients/clients/service users and former patients/clients/service users of the Hospice.

If the patient/client/service user is incapable, within the meaning of the Adults with Incapacity (Scotland) Act 2000 (asp 4) in relation to making or authorising the application, any person entitled to act on behalf of the patient/client may make a request.

Where the patient/client/service user has died, the patient/client/service user's personal representative and any person who may have a claim arising out of the patient/client/service user's death may make a request.

Cookies

We use these to improve the user's experience of our website, temporarily store data and understand the parts of the website that users are visiting. Cookies help us gather statistics on the use of our website anonymously. You can set your browser to not accept cookies, but this may affect the functionality of the website. More about cookies can be found at www.allaboutcookies.org.

[We are a partner in the Local Hospice Lottery which is run by Local Hospice Lottery Ltd. We have installed a Meta Pixel on our web page for the lottery which allows LHL Ltd to track marketing activity.](#)

[View our Cookie Policy and a full list of cookies on our site here.](#)

Online Links and Third Parties

This notice only applies to Highland Hospice and its subsidiary companies, so when you link through to our partner companies (e.g. to donate, register for an event or pay in the online shop) please read their own privacy notices.

July 2024