



## Privacy Policy

**Approved by:** Governance Sub-Committee

**Lead Director(s):** Chair of the Governance Sub-Committee

**Originator(s):** CEO

**Date of Approval:** April 2021

**Version:** Updated original version – 3 year review - final

**Review Interval:** Every three years

**Review due by:** April 2024

**Appended Documents:** none

**Responsibility for Dissemination and Implementation:** CEO

**Implementation date:** April 2021

### POLICY STATEMENT

At Beaumont House Hospice Care we are committed to protecting your privacy. When you interact with us by phone, mail, in person or online, we sometimes receive personal information about you. This page, together with our website terms and conditions, tells you about how we collect, use, and store your personal information.

Please read this policy carefully to understand how we collect, use, and store your personal data. If you have any queries about our privacy policy, please contact the Data Protection Officer at [info@beaumonthouse.co.uk](mailto:info@beaumonthouse.co.uk) or call us on 01636 610556.

Version Control	Amendments Made	Amended by	Date
<b>Version 1</b>	Put into new template, with revised job titles, dates etc. added.  Reviewed by DA and CL – no changes	AW	24.02.21
<b>Version 2</b>	Date change. Ready to share with Sub-Comm	AW	12.04.21
<b>Version 3</b>	Reviewed by PH with minor changes	PH	13.04.21
<b>Final</b>	Final version for approval	AW	18.04.21

## CONTENTS

1.	Introduction.....	2
2.	Policy and Procedure Drafting and Approval .....	2
3.	Associated Policies, Procedures and Guidance .....	3
4.	Aims and Objectives.....	3
5.	Scope of the policy .....	3
6.	Accountabilities and Responsibilities .....	4
7.	What This Policy Takes Into Account (Method ) .....	4
7.1	How we collect information about you .....	4
7.2	What information we collect .....	4
7.3	How we use your information .....	5
7.4	Your consent.....	5
7.5	Marketing Consent .....	5
7.6	How we protect your personal information .....	6
7.7	Your credit card information .....	6
7.8	Job applicants, and current and former Beaumont House employees .....	6
7.9	How to find out what personal information we hold about you .....	6
7.10	How to change the personal information we hold about you .....	7
8.	Equality Impact Assessment .....	8
9.	Training Needs Analysis - Staff Training requirements.....	8
10.	Monitoring Compliance with the policy / procedure .....	9
11.	References .....	9
12.	Policy Review.....	9
13.	Sign off sheet regarding dissemination of procedural documents.....	9

### 1. Introduction

We will process any data in accordance with the Data Protection Act 1998 and the General Data Protection Regulations 2018. The purpose of this privacy policy is to inform people who use Beaumont House Hospice Care about what information we collect when they visit the service, how we use the information, whether the information is disclosed and the ways in which we protect users' privacy.

### 2. Policy and Procedure Drafting and Approval

This policy is drafted by the CEO and approved by the Governance Risk and Scrutiny sub-

committee of the Board of Directors.

## **Document Control**

Approved policies and procedures are centrally indexed. One full copy of the policy manual will be kept in the office of the Head of Clinical Services, with a manual of the Care policies in the same office and a manual of the Health & Safety policies in the office of the Catering and Housekeeping Supervisor's office. All other versions will be electronic and kept on the shared drive to avoid out of date copies being used.

Revised versions of all policies and procedures are kept electronically and are accessible by all staff on the U drive. Staff will be made aware of the relevant revisions or new editions via email and via the staff bulletin.

## **3. Associated Policies, Procedures and Guidance**

- Information Governance Policy
- Data Protection Policy

This privacy policy also takes into account several legal instruments, including:

- the Data Protection Act 1998
- the General Data Protection Regulations 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 ("The European Union Cookie Directive")

## **4. Aims and Objectives**

We want people to feel secure when using the website and our care services. We are committed to respecting privacy. The following sets out an overview of how we do that.

## **5. Scope of the policy**

The scope of this policy includes all data held by Beaumont House Hospice Care including HR, Care, Finance and Fundraising information.

Privacy and Data Protection centres around decency and common sense.

In broad terms Beaumont House Hospice Care will:

- keep all information it has about you private and confidential
- use the information solely for the purpose for which it was provided

- not use or disclose the information unless authorised by you specifically or as per the section headed **Your Consent** below (unless ordered by a Court or Regulator)
- not retain the information for longer than absolutely necessary

## **6. Accountabilities and Responsibilities**

The Chief Executive is ultimately accountable for the implementation and operation of this policy in conjunction with the relevant member of the leadership team.

## **7. What This Policy Takes Into Account (Method )**

### **7.1 How we collect information about you**

We may collect and store information about you whenever you interact with us. For example, when you make a donation, register for an event or submit an enquiry, or if register for our services, or apply for a job or volunteering opportunity, or otherwise give us any other personal information.

We may also receive information about you from third parties for a specific purpose– but only if you’ve given them permission to share your information.

### **7.2 What information we collect**

When you interact with us, we may ask you to give us your name, address, email address, telephone number if this is needed, or your, bank account details, if for example you are setting up a regular payment by direct debit. Your date of birth and relevant medical information will only be collected if appropriate, for example to register for a challenge event.

We may collect some, or all, of this information when you visit our website, depending on how you use it. We also monitor how people use our website, so we can improve it. However, you can use our website without giving us any personal information and we won't know who you are.

If you visit our site anonymously, we may however still record information about:

- the areas of the website you visit
- the amount of time you spend on the site
- whether you are new to the site, or have visited it before
- how you came to our website – for example, through an email link or a search engine
- the type of computer, browser, network location and internet connection you use.

We do this by using cookies, which you can learn more about by reading our cookie policy.

### **7.3 How we use your information**

Beaumont House Hospice Care will collect data from you to process your donation, personalise your supporter experience or provide you with the goods or services you have requested, and comply with our administrative duties, financial regulations and the law.

Personal details collected this way will only be used to provide you with information you would reasonably expect or have agreed to. This may include using your data, in combination with public data sources, to analyse, research and profile the data we hold, so that our communications with you and others are appropriate and cost effective.

We promise to make all reasonable efforts to keep your details secure and will only share them with suppliers or professional agents working on our behalf, for example professional fundraising organisations or mailing houses who are sending out our marketing materials on our behalf. We will ensure we received from these agents a contract of confidentiality to ensure they acknowledge their responsibility in processing any data we share

Except as required by law we will never share your details with other organisations to use for their own purposes.

### **7.4 Your consent**

By giving us your personal information, including sensitive personal data like information about your health, you consent to us collecting and using that information in the ways that we describe in this privacy policy and/or that you have specifically consented to.

You also consent to us transferring your information to countries or jurisdictions which may not provide the same level of data protection as the UK, if necessary, for any of the above purposes. If we do transfer your information in this way, we will comply with our legal obligations as a data controller under the Data Protection Act 1998 and, if we need to, put in place a contract with the companies we use to process information to ensure your details are properly protected.

### **7.5 Marketing Consent**

We will only send you marketing information by e-mail, SMS, or phone if you have given us specific consent. If you withdraw your consent and then subsequently opt in, then your most recent preference may take precedence.

If you have responded to a letter of appeal, you may also receive fundraising mail, which you can opt out of at any time.

You can opt out of us using your personal details for marketing at any time either by calling us on 01636 610556, or by e-mail to [info@beaumonthouse.co.uk](mailto:info@beaumonthouse.co.uk)

## **7.6 How we protect your personal information**

We take appropriate physical, electronic, and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

Although we use appropriate security measures once we have received your personal information, the transmission of information over the internet is never completely secure. We do our best to protect personal information, but we cannot guarantee the security of information transmitted to our website, so any transmission is at the user's own risk.

Donations are currently processed via Just Giving and we may use similar programs in the future.

## **7.7 Your credit card information**

If you use your credit/debit card to donate to us, buy something or make a booking online, we pass your credit/debit card details securely to our payment processing system.

## **7.8 Job applicants, and current and former Beaumont House employees**

If you apply for a job or volunteering opportunity, we will also collect information, so we can assess your suitability for the role. We will only use the information you give us to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Beaumont House - for example, if we need a reference, or need to get a 'disclosure' from the Criminal Records Bureau - we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job or a volunteer application, we will hold your personal information for 6 months after we've finished recruiting the post you applied for as per HR guidance. After this date we will destroy or delete your information. We keep de-personalised statistical information about applicants to develop our recruitment processes, but this does not contain any information that could be used to identify individual job applicants.

If you begin employment with us, we will put together a file about your employment. We keep the information in this file secure and will only use it for matters that apply directly to your employment.

Once you stop working for us, we will keep this file according to our record retention guidelines. You can contact us to find out more about this.

## **7.9 How to find out what personal information we hold about you**

You can request details of the personal information we hold about you under the Data Protection Act 1998. We may ask you for an administrative fee of £10.00.

If you would like a copy of the information we hold on you, in the first instance please write to:

The Chief Executive  
Beaumont House Hospice Care  
32 London Road  
Newark  
NG24 1TW

Or email [info@beaumonthouse.co.uk](mailto:info@beaumonthouse.co.uk)

### **7.10 How to change the personal information we hold about you**

If you want to update the information we hold for you, or you think any information we have about you is incorrect or incomplete, please get in touch as soon as possible.

You can write to us at:

The Chief Executive  
Beaumont House Hospice Care  
32 London Road  
Newark  
NG24 1TW

Or email [info@beaumonthouse.co.uk](mailto:info@beaumonthouse.co.uk) or call us on 01636 610556

Our privacy policy may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them.

## 8. Equality Impact Assessment

The impact assessment tool below must be carried out on the policy and considered for aspects of it.

	Name of Policy/Procedure	Yes/No/NA	Comments
1	Does the policy or guidance affect one group less or more favourably than another based on:		
	• Race	No	
	• Ethnic Origin	No	
	• Nationality	No	
	• Gender (Male/Female/Transgender)	No	
	• Culture	No	
	• Religion or Belief	No	
	• Sexual Orientation (Lesbian/Gay/Bisexual)	No	
	• Age	No	
	• Disability (learning disabilities, physical disability, sensory impairment and mental health problems etc)	No	
	Employment status (full/part/bank/retired)	No	
	Marital Status/Civil Partnership	No	
	Trade union membership/non-membership	No	
2	Is there any evident that some groups are affected differently?	No	
3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4	Is the impact of the policy/guidance likely to be negative?	No	
5	If so, can the impact be avoided?	N/A	
6	What alternatives are there to achieving the policy / guidance without the impact?	N/A	
7	Can we reduce the impact by taking different action?	N/A	
	<b>Name of Assessor</b>		<b>Signed</b>
	CEO		

## 9. Training Needs Analysis - Staff Training requirements

All staff need awareness of this policy and the majority of staff are required to complete the mandatory annual data security training in relation to this policy.



## 10. Monitoring Compliance with the policy / procedure

Through exception reports to the Governance, Risk and Scrutiny Sub Committee.

## 11. References

- the Data Protection Act 1998
- the General Data Protection Regulations 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 (“The European Union Cookie Directive”)

## 12. Policy Review

This policy will be reviewed every 3 years or sooner in the light of changes in the law or following investigations of incidents that indicate a change is required.

## 13. Sign off sheet regarding dissemination of procedural documents

To be completed and attached to any document which guides practice when submitted to the appropriate committee for consideration and approval.

<b>Title of document:</b>	<b>Complete and sign</b>
<b>Lead Director:</b>	Chair of Governance Sub Committee
<b>Sub Committee:</b>	Governance
<b>Date Approved:</b>	April 2021
<b>Ratified by Board:</b>	Delegate to sub committee
<b>Dissemination Lead:</b>	CEO
<b>All relevant staff informed of changes, training plan in place to allow for full implementation.</b>	Separately recorded
<b>Date placed in policy files:</b>	April 2021
<b>Review Date:</b>	April 2024