

Privacy Notice

At St Raphael's Hospice, we are committed to protecting your personal information and privacy. We aim to 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.

If you have any queries about this Privacy Notice, please contact our Data Protection Lead on 020 8099 7777 or enquiries@straphaels.org.uk

St Raphael's Hospice

In this Privacy Notice, 'St Raphael's Hospice' means St Raphael's Hospice - a registered charity (charity number 1182636) specialising in end of life care, based at London Road, Cheam, Sutton SM3 9DX. We are registered with the Information Commissioner's Office, registration reference ZA108179.

What is Personal Information

Personal Information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What is Personal-Sensitive Information

Personal-Sensitive data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We collect personal and personal-sensitive information from you when you use our Services.

We do not consider personal or personal-sensitive information to include information that has been anonymised or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

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 clinical, educational or social care support services
- be acknowledged as the next of kin, main carer, main contact or emergency contact 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
- buy from our online shop

We may also receive information about you from third parties that we work with or support, for example our service users, Just Giving, pension providers or DBS/CRB.

The Personal Information We Collect

Service Users, Next of Kin, Main Carer/Contact, Emergency Contact

The types of information we might collect from service users and family members/main carer/emergency contacts include contact details (names, postal addresses, email addresses, phone numbers) date of birth and next of kin as well as information of a clinical and personal-sensitive nature.

If you give us Personal Information about someone else, you must do so only with that person's authorisation. You should inform them how we collect, use, disclose, and retain their personal information according to our privacy notice.

We may collect personal-sensitive information including but not limited to race, faith, gender, religion, disability and family life for statistical and reporting purposes but these will be anonymised and no individual will be identifiable.

Employees and Volunteers

The types of information we might collect from employees and volunteers include contact details including name, address, personal email address, phone numbers, date of birth, emergency contact/next of kin details, employment history, disabilities relevant to the employment or volunteering role, recruitment, payroll, performance and training records, information obtained through electronic means, such as swipe-cards, information about your use of our IT systems, including usage of telephones, e-mail and the Internet and photographs.

We may collect personal-sensitive information including but not limited to race, faith, gender, religion, disability and family life for statistical and reporting purposes but these will be anonymised and no individual will be identifiable.

Supporters

The types of information we might collect from supporters include contact details including name, postal address, email address, phone numbers, date of birth, 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 unless you have provided us with specific authorisation.

We do not collect personal-sensitive 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.)

Third Parties - Suppliers and Contractors

The types of information we might collect from third parties include contact details including name, postal address, email address, phone numbers, communication preferences, bank, credit or debit card details..

We will not store credit or debit card details after they have been processed unless you have provided us with specific authorisation.

We do not collect personal-sensitive data such as race or disability, about our suppliers and contractors unless there is a legitimate reason for this.

Lawful Basis and Purpose

Service Users and Next of Kin, Family Members, Main Contacts

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016

Article 6(1)(f) relates to personal data and states

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”

Article 9(2)(h) relates to personal-sensitive data and states

“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional ...”

The lawful basis for processing service user personal data including, main carer/contact, next of kin, family data is for the purposes of the legitimate interests of providing a health and social care service and of communicating with potential supporters of the Hospice in its provision of a health and social care service. Personal-sensitive data held on service users is processed for the purposes of providing a health and social care service.

This personal and personal-sensitive information is collected for the purposes of providing clinical care and non-clinical therapeutic 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 which is only shared with us under strict guidelines.

Your personal data will be retained in accordance with the Records Management Code of Practice for Health and Social Care 2021 (and subsequent revisions) to service our legitimate interest in providing a health and social care service.

This personal information is also collected for the purposes of providing our fundraising department with contact information for potential sources of support. The Hospice’s operational running is heavily reliant upon supporter donations. Without donations, engagement and participation in fundraising events or activities that both provide opportunity to generate funds for the Hospice and promote the Hospice’s services in the heart of its local community, the Hospice could not afford to operate.

Your personal data will be retained to service our legitimate interest in communicating with potential supporters of the Hospice in its provision of a health and social care service.

Should you **not** wish to receive information or other contact from our Fundraising Department again then you should contact our Director of Fundraising and Communications either by:

Mail: The Director of Fundraising and Communications
St Raphael's Hospice
London Road, Cheam, SUTTON, SM3 9DX
Telephone: 020 8254 2450 or
E-mail: supportercare@straphaels.org.uk.

If you, a relative or a friend, are cared for or are supported by St Raphael's 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 quality of our services.

St Raphael's 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.
- unless it is in accordance with the lawful basis and legitimate interest of the Hospice as set out above. Such disclosure will be subject to strict data security agreements with such Third Parties that legally limit the use of your data to only service the legitimate interest of the Hospice.
- exceptionally, to professional bodies or otherwise as required by law, regulation or codes of practice

We will not use your information for other purposes without your permission.

Employees and Volunteers

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016

Article 6(1)(c) relates to personal data and states

“processing is necessary for compliance with a legal obligation to which the controller is subject;”

Article 6(1)(f) relates to personal data and states

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”

Article 9(2)(h) relates to personal-sensitive data and states

“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional ...”

The lawful basis for processing employee and volunteer data is in the legitimate interest of managing the relationship between the Hospice and the employee or volunteer, compliance with our legal statutory obligations and of communicating with potential supporters of the Hospice in its provision of a health and social care service.

We use the information collected on our employee and volunteer application forms to identify if you are suitable to work or volunteer with St Raphael's 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 and for communicating with you as a potential supporter of the Hospice in its provision of a health and social care service.

If you cease to be employed by or volunteer with St Raphael's Hospice we will retain your personal data that services our legal obligation and our legitimate interest in communicating with potential supporters of the Hospice in its provision of a health and social care service.

Should you **not** wish to receive information from the Hospice or other contact from our fundraising department again then you should contact our Director of Fundraising and Communications either by:

Mail: The Director of Fundraising and Communications
St Raphael's Hospice
London Road, Cheam, SUTTON SM3 9DX
Telephone: 020 8254 2450 or
E-mail: supportercare@straphaels.org.uk

Supporters

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016

Article 6(1)(c) relates to personal data and states

“processing is necessary for compliance with a legal obligation to which the controller is subject;”

Article 6(1)(f) relates to personal data and states

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”

The lawful basis for processing data held on our supporters is in the legitimate interest of raising charitable funds to support the delivery of a health and social care service from St Raphael's. This information provides our fundraising department with contact information for potential sources of support. The Hospice's operational running is heavily reliant upon supporter donations. Without donations, engagement and participation in fundraising events or activities that both provide opportunity to generate funds for the Hospice and promote the Hospice's services in the heart of its local community, the Hospice could not afford to operate.

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

- to provide you with services, products or information;
- 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;
- 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.

We may also use your details:

- to invite voluntary participation in research or surveys;

Your personal data will be retained to service our legitimate interest in communicating with potential supporters of the Hospice in its provision of a health and social care service.

Should you **not** wish to receive information or other contact from our Fundraising Department again then you should contact our Director of Fundraising and Communications either by:-

Mail: The Director of Fundraising and Communications
St Raphael's Hospice
London Road, Cheam, SUTTON SM3 9DX
Telephone: 020 8254 2450 or
E-mail: supporter@straphaels.org.uk.

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.

We will never sell or share your data with any other third party unless required by law.

Relying on our legitimate interest of raising charitable funds to support the delivery of a health and social care service from St Raphael's, we may contact you via post or phone call (unless you have registered with the Telephone Preference Service) otherwise any contact from us via text message or e-mail must be by us having received your expressed consent.

Third Parties

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016

Article 6(1)(b) relates to personal data and states

“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

Article 6(1)(f) relates to personal data and states

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”

The lawful basis for processing third party data is in the legitimate interest of managing the relationship between the Hospice and its third party suppliers and compliance with our legal statutory obligations and of communicating with potential supporters of the Hospice in its provision of a health and social care service.

We will retain your personal data that services our legal obligation and our legitimate interest in communicating with potential supporters of the Hospice in its provision of a health and social care service.

Your Updates and Preferences

It is important that we keep your personal information up to date. You can contact us on 020 8099 7777 or enquiries@straphaels.org.uk at any time if your circumstances change.

For our legitimate fundraising purposes we will mail you newsletters and fundraising information unless you inform us that you do not wish to receive such contact from St Raphael's.

You can stop receiving such correspondence/contact at any time by contacting the Fundraising Team on 020 8254 2450 or supportercare@straphaels.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 020 8254 2450 or supportercare@straphaels.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.

Please be aware that should we receive your instruction that you no longer wish to receive our communications that there will be a time-lag and you may still receive

communications already processed. Every endeavour will be made to reduce such a likelihood and action your instruction in a timely fashion.

Sharing with Third Parties

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

We will only share information with other organisations such as GP practices, community and hospital teams 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 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.

Data Security

St Raphael's 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.

No data transmission over the internet can be guaranteed 100% secure. As a result, while we strive to protect your personal information, St Raphael's 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 St Raphael's 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:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- 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 Data Protection Lead on enquiries@straphaels.org.uk for more information. If after contacting us you are unhappy with our use of your personal data, you should raise a complaint with us. If, having exhausted our complaints' process you remain unhappy, you have the right to complain to the Information Commissioner's Office, www.ico.org.uk.

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.

Online Links and Third Parties

This notice only applies to St Raphael's 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.

Change of Ownership

If our legal status changes, for example if we form or become part of a new legal entity, then we may share information with that entity in accordance with our privacy standards. Should such an event occur, we will require that the new entity follow this privacy notice with respect to your personal information. If we intend to handle your personal information for any purposes not covered in this privacy notice, you will receive prior notification of the processing of your personal information for the new purposes.

Contact Us

If you have any queries in relation to our collection, storage, processing and use of personal information, please contact our Data Protection Lead on 020 8099 7777 or enquiries@straphaels.org.uk.