



# Privacy statement

May 2018



---

# Privacy statement

---

## Privacy statement

This Privacy Statement sets out the data processing practices carried out by Healthwatch Oldham. We retain and use personal data (information that relates to and identifies living people) to help us carry out our role as the local independent champion for people who use health and social care services.

Find out more about our purpose and what we do at <https://www.healthwatcholdham.co.uk/content/about>

We will always make sure that your information is protected and treated securely. Any information that you give will be held in accordance with:

- Data Protection Act 1998
- As of 25 May 2018, the new data protection legislation introduced under the General Data Protection Regulation (GDPR) and Data Protection Bill.

Read our Information Governance Policy here:

[http://www.healthwatcholdham.co.uk/sites/default/files/hwo\\_ig\\_policy.pdf](http://www.healthwatcholdham.co.uk/sites/default/files/hwo_ig_policy.pdf)

We also make our Information Asset Register available for people to read to give further clarity about how data relating to them is managed and kept secure. This includes our retention schedule and clear details about the lawful basis for storing and keeping personally identifiable information. Please contact us if you want to find out more about our Asset Register.

## Information we collect

We collect personal information from visitors to this website through the use of online forms and every time you email us your details. We also collect feedback and views from people about the health and social care services that they access. In addition, we receive information about our own staff and people who apply to work for us.

- Information about people who use our website
- Information about people who share their experiences with us by other means
- Information about our own staff and people applying to work for us

## Security

We are strongly committed to data security and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption.

We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us.

Only authorised employees and contractors under strict controls will have access to your personal information.

## Information about people who use our website

Please note that this statement does not cover links within this website to other websites.

When you browse through the information on this website, it does not store or capture your personal information. We do log your IP address (as it is automatically recognised by the web server) but this is only so you can download this website onto your device rather than for any tracking purpose; it is not used for any other purpose.

We will only collect personal information provided by you, such as:

- feedback from surveys and online forms
- email and postal addresses
- preferred means of communication.

## Cookies

Please be aware that some systems on our website require the use of cookies, but we will always state if this is the case. We will never collect and store information about you without your permission.

Find out more about our use of Cookies at:

<http://www.healthwatch.co.uk/cookies>

## How we will use your personal information

Personal information about you can be used for the following purposes:

- in our day-to-day work;
- to send you our newsletter where you have requested it;
- to respond to any queries you may have;
- to improve the quality and safety of care.

This may include any personal information that you choose to share with us, but we will treat this as confidential and protect it accordingly.

We will never include your personal information in survey reports.

## Information about people who share their experiences with us by other means

There are a number of ways that we collect feedback from people about their experiences of using health and social care services day to day. Our staff will visit different health and social care settings as part of their role to evaluate how services are being delivered. We receive phone calls and requests for information directly from members of the public as part of our signposting service. We provide a service to guide people through the NHS complaints process.

Where personally identifiable information is collected we will ensure that we have your consent to keep it and we will be clear on how we intend to use your

information. We will aim to anonymise information where we can but there may be instances where this is not possible in order to make change happen on your behalf. There may be exceptional circumstances where we can and will keep the data without consent but we must have a lawful basis for doing so, such as for safeguarding purposes.

We ensure that where consent is required it will be freely given, used only for agreed specific and unambiguous purposes and that you are well informed about how the information will be kept. This includes where it will be stored, details on security and for how long it will be kept. We will comply with current data protection legislation at all times.

Personal information may be collected with your consent through:

- Our signposting and advice service
- When we receive feedback by phone, outreach work or through surveys
- Enter and View activity
- NHS Complaints service
- Events

### **Personal data received from other sources**

On occasion we will receive information from the families, friends and carers of people who access health and social care services. We use this data to inform providers and commissioners to help them deliver services that work for you.

Where it is practically possible, we will make sure that we have your consent to use information that is about you. We will only process your personal data where there is a lawful basis to do so under current data protection legislation.

### **Publishing information**

In most circumstances we anonymise our data to ensure that a person cannot be identified, unless this has been otherwise agreed and consent has been given.

### **Sharing your data with Healthwatch England**

We are required to share information with Healthwatch England to ensure that your views are considered at a national level. This enables them to analyse service provision across the country and supply the Department of Health and national commissioners with the information you provide.

Find out more about Healthwatch England's purpose and what they do at <https://www.healthwatch.co.uk>

The information we provide to Healthwatch England contains no personally identifiable data. Any information that is used for national publications is anonymised and will only be used with the consent of a local Healthwatch.

### **Our data systems**

Healthwatch Oldham uses a secure digital system to manage their data. Third party organisations provide maintenance support for the system and a Data Processing

Agreement is in place to ensure that this is held securely and according to current data protection legislation.

Healthwatch England is a committee of the Care Quality Commission (CQC) but acts independently. These organisations must comply with all legal requirements and do not reuse any data for any other reason or make it available to others.

### **Information about our own staff and people applying to work with us**

We need to process personal data about our own staff (and people applying to work for us) so that we can carry out our role and meet our legal and contractual responsibilities as an employer.

The personal data that we process includes information about racial or ethnic origin, religion, disability, gender and sexuality. We use this information to check we are promoting and ensuring diversity in our workforce and to make sure we are complying with equalities legislation.

Our employees decide whether or not to share this monitoring data with us, and can choose to withdraw their consent for this at any time. Employees who wish to withdraw their consent for us to process this data can let us know.

Other personal data that we are required to process includes information on qualifications and experience, pay and performance, contact details and bank details.

We check that people who work for us are fit and suitable for their roles. This may include asking people to undertake Disclosure and Barring Service (DBS) checks.

We have a legal obligation to comply with the Freedom of Information Act 2000 and this may include the requirement to disclose some information about our employees - especially those in senior or public facing roles. We also publish some information about our staff, including the names and work contact details of people in some roles.

### **How we share information with other organisations**

We only share personal information with other organisations where it is lawful to do so and in accordance with our Information Governance Policy. Information is shared in order to fulfil our remit which is to pass on your experiences of care to help improve them on your behalf.

We work with Healthwatch England, the Care Quality Commission (CQC), local commissioners, NHS Improvement and our local authority to make this happen. We can also engage external suppliers to process personal information on our behalf.

We will only disclose your personal information where we have your consent to do so, or where there is another very good reason to make the disclosure - for example, we may disclose information to CQC or a local authority where we think it is necessary to do so in order to protect a vulnerable person from abuse or harm. Any such disclosure will be made in accordance with the requirements of the current data protection legislation.

Wherever possible, we will ensure that any information that we share or disclose is anonymised, so as to ensure that you cannot be identified from it.

We sometimes use other organisations to process personal data on our behalf. Where we do this, those companies are required to follow the same rules and information security requirements as us, outlined in a Data Processing Contract. They are not permitted to use or reuse the data for other purposes.

## Retention and disposal of personal data

We publish a Record Keeping and Retention Policy ([http://www.healthwatcholdham.co.uk/sites/default/files/hwo\\_record\\_keeping\\_and\\_retention\\_policy.pdf](http://www.healthwatcholdham.co.uk/sites/default/files/hwo_record_keeping_and_retention_policy.pdf)) which explains how long we keep different types of records and documents for, including records and documents containing personal data. Personal data is deleted or securely destroyed at the end of its retention period.

## Your rights

### Your right to access information about you

If you think we may hold personal data relating to you and want to see it please write to [info@healthwatcholdham.co.uk](mailto:info@healthwatcholdham.co.uk)

### Correcting or deleting your personal data

If you know that we are holding your personal data and believe that it may be wrong, or if you want it to be deleted or for us to stop using it, you have a right to request that it can be deleted or amended.

Please make your objection in writing to [info@healthwatcholdham.co.uk](mailto:info@healthwatcholdham.co.uk)

Or send it by post to:

Manager, Healthwatch Oldham, 12 Manchester Chambers, West Street, Oldham, OL1 1LF

### Complaints about how we look after or use your information

If you feel that we have not met our responsibilities under data protection legislation, you have a right to request an independent assessment from the Information Commissioner's Office (ICO). You can find details on their website at [www.ico.org.uk](http://www.ico.org.uk).

## Our contact details and key roles

Healthwatch Oldham is part of the Action Together family of services. Action Together will act as the data controller for all of the personal data that you provide us with at Healthwatch Oldham. Any issues relating to the processing of personal data by or on behalf of Healthwatch Oldham may be addressed to:

Data Protection Manager, Action Together, 95-97 Penny Meadow, Ashton-under-Lyne, OL6 6EP

Telephone: 0161 667 2526

Email: <mailto:info@actiontogether.org.uk>