

## Trust General Privacy Notice

<b>Name of Data Controller</b>	Norfolk & Norwich University Hospital, Colney Lane, Colney, Norwich NR4 7UY
<b>Name of controller contacts/DPO</b>	Mark Northcott, Data Protection Officer Email: <a href="mailto:info.gov@nnuh.nhs.uk">info.gov@nnuh.nhs.uk</a>

This notice tells you how the Norfolk and Norwich University Hospitals NHS Foundation Trust (NNUH) (the “Trust”) will use your personal data to provide health care services, and your rights in relation to this use.

We also provide this information in an easy-to-understand format for children available at: <https://www.nnuh.nhs.uk/publication/children-s-privacy-notice/>

Where we provide services that use your information for specific reasons or in different ways, we have purpose-specific privacy notices which give the relevant information available at: <https://www.nnuh.nhs.uk/privacy-notice/>

This is part of our commitment to ensure that we are transparent and accountable for how we process your personal information.

### Why we collect information.

We collect personal confidential information about you which will be used to support the delivery of high-quality care and treatment. We process your data to help us deliver our services in performing our public task of delivering health care. Where we are doing so to fulfil a statutory function, we do so because we have to meet a legal obligation.

Your information is known as your personal data and your medical information is known as special category data. Your records may also include other special category data, such as your sexuality, race or religious beliefs. For example, these records may include:

- Basic details about you such as name, address, date of birth, next of kin, GP practice etc.
- Contact we have had with you such as your appointments, inpatients stay or clinic visits.
- Notes and reports about your health and any treatment and care you may have received or need.
- Results of clinical investigations such as x-rays, scans and laboratory tests and photography
- Relevant information from other health and social care providers, local authorities, voluntary organisations, relatives or those who know you well and who care for you

When we process your data, we do so to provide a medical diagnosis and for the purpose of health or social care or treatment or the management of health or social care systems and services. It is important we have accurate and up to date

information about you so we can give you the best possible care. Please **always** check your personal details are correct whenever you visit us and tell us if there are any changes, for example, changes to your contact details or GP practice as soon as possible.

When providing care, or commissioning other providers to provide direct care, we may check patient information against the National Patient Demographic Service (PDS), which is supported by GPs. NNUH staff cannot update the GP System, therefore it is extremely important your personal information recorded on the PDS is always correct and up to date.

### **How we use information.**

It is important for us to have a complete picture as this information helps staff involved in your care to develop care plans, deliver suitable treatment and deliver and provide improved care.

Your records are used to direct, manage and deliver the care you receive to ensure:

- The doctors, nurses and other health or social care professionals involved in your care have correct and up to date information to:
  - Assess your health and decide on the most suitable care for you.
  - Assess and improve the quality and type of care you receive.
- Appropriate information is available if you see another doctor or are referred to a specialist or another part of the NHS or social care.

Your information will also be used to help us to:

- Manage and review the care we provide to ensure it is of the highest standard and quality.
- Ensure our services meet patients' needs in the future.
- Plan your integrated care with others
- Investigate any concerns, complaints and legal claims you may have
- Prepare statistics on NHS performance
- Audit Trust accounts and services
- Service Evaluations/Improvements
- Use de-identified information to conduct health research and development. If information which will identify you is needed for research, we will request your permission before we use it. You may then choose to get involved or not.
- Use de-identified information about you to teach and train healthcare professionals.

Where we do expect to need to use personal information for anything other than direct healthcare, we will always refer to the National Data Opt-Out Service to ensure that information is not used if you have opted out. If you need more information about the National Data Opt-Out it is available on the NHS website at: [Understanding the national data opt-out](#).

## **How information is saved and kept safe.**

It is important that your information is kept safe and secure to protect your confidentiality. Information is saved in secure electronic and paper records and access is restricted to those who need to know. There are various ways in which your privacy is protected:

- by removing your identifying information,
- using an independent review process,
- adhering to strict contractual conditions and
- ensuring strict sharing or processing agreements are in place.
- Managing who has access to what information (user access controls)

## **How we keep information confidential.**

Everyone working for the Trust is subject to the Common Law Duty of Confidentiality and the Data Protection Act 2018 (including UK GDPR). Information provided in confidence will only be used for the purposes for which it has been gathered, or for purposes closely associated with it, unless there are other circumstances covered by the law which mean we must disclose the data.

Under the NHS Confidentiality Code of Conduct, all staff must protect information, inform you of how your information will be used and allow you to decide if and how some of your information can be shared. This will be noted in your records.

All Trust staff must undertake annual training in data protection, confidentiality and cyber security, with additional training for specialists, such as healthcare workers, data protection officers and IT staff.

You may be receiving care from other organisations as well as the NHS e.g. Social Services and the Voluntary Sector. We may need to share some information about you so we can all work together for your benefit. We will only ever use or pass on information about you if others involved in your care have a genuine need for it. When we pass on any information, we will ensure it is kept confidential and secure.

Anyone who receives information from us is also under a legal duty to keep it confidential and secure.

We are required by law to report certain information to the appropriate authorities. This is only provided after formal permission has been given by a qualified health professional, as defined under the Data Protection Act 2018. Examples of occasions when we must pass on information include:

- Notification of births and deaths
- Where we find infectious diseases which may endanger the safety of others such as measles and meningitis
- Adult and Child safeguarding and Domestic Abuse cases
- When there is a formal court order requesting disclosure
- Department of Work and Pensions requests

## **Who we share your information with.**

To provide the best care possible, sometimes we will need to share your data with others. We only do this where it will be in your best interests, or we are under a legal obligation to do so. Anyone who receives information from us has a legal duty to keep it confidential.

We will share information with partner organisations including, but not restricted to:

- NHS Trusts, Hospitals and healthcare service providers which are involved in your care
- Non-NHS healthcare service providers involved in your care
- Norfolk and Waveney Integrated Care Board and other NHS Bodies
- General Practitioners (GPs)
- Ambulance Trusts

You may be receiving care from other service providers as well as the NHS, for example Social Services. We may need to share some information about you with them so we can all work together for your benefit if they have a genuine need for it as part of your care or we have your permission. Therefore, we may also share your information with organisations including, but not restricted to:

- Social Services
- Education Services
- Local Authorities
- Police
- Voluntary and private sector providers working with the NHS.

Where we share your information, we will have appropriate security measures in place. There will be either a contract or an information sharing agreement in place. We will only share your information where we are satisfied that there are sufficiently secure arrangements in place with the other organisation.

## **The law that allows us to use information.**

The Trust must provide a legal basis for the processing of your information.

The Trust is an NHS organisation, and it has a public duty to provide care for its patients. Under UK Data Protection Legislation, the Trust may process your information to provide you with health and social care treatment, as well as the management of health or social care systems and services.

If we need to use your personal information for any reason beyond those stated above, we will discuss this with you. You have the right to ask us not to use your information in this way, however there might be times when we must still share your information, we will discuss this with you.

We use your information using the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation 2021 (GDPR). Specifically, we rely on articles 6 – Lawfulness of processing and 9 – Processing of Special Categories of Data.

Where necessary, we share information in line with the NHS Act 2006 (Section 72) and the Health and Social Care Act 2015 (Section 3).

### **How long we keep your records.**

The length of time that we keep records varies but we use internal policies that follow NHS guidance on the retention periods for data and information which we hold - [NHS Records Management Code of Practice](#).

### **Your information, your rights.**

You have certain rights in relation to your information. These rights depend on the reason we process your data. It may not be possible to agree to your request, if the need to keep the record is of significant importance. If it is not, we will explain the reason for this to you. Your rights are to:

- **Be Informed** - To be informed why, where and how we use your information
- **Access** - To ask for access to your information
- **Rectification** - To ask for your information to be corrected if it is inaccurate or incomplete
- **Erasure** - To ask for your information to be deleted or removed where there is no need for us to continue processing it
- **Restrict Processing** - To ask us to restrict the use of your information
- **Data Portability** - To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information
- **Object** - To object to how your information is used
- Challenge any decisions made without human intervention (automated decision making)

You have the right to refuse/withdraw consent to information sharing at any time, unless we are legally required to continue to do so. The possible consequences of withdrawing consent to share will be fully explained to you and could include delays in receiving care

If you would like further information about any of these rights, please contact the Trust's Data Protection Officer using the details below or visit our website.

### **Contacting us if you have a concern or complaint.**

We aim to meet the highest standards when collecting and using personal information. We encourage people to bring concerns to our attention and we take any complaints we receive very seriously.

If you have any further queries on the uses of your information, please speak to your health professional or you can contact our PALS and Complaints Department:

email [palsandcomplaints@nnuh.nhs.uk](mailto:palsandcomplaints@nnuh.nhs.uk)

01603 289036 Monday to Friday

OR

Get in touch with our Data Protection Officer at:

Email - [info.gov@nnuh.nhs.uk](mailto:info.gov@nnuh.nhs.uk)

Post - Level 4

Norfolk and Norwich University Hospital Foundation Trust  
20 Rouen Road  
Norwich  
NR1 1QQ

Phone - 01603 286286.

If you are still unhappy with the outcome of your enquiry you can contact the ICO:

Online - [ICO - Make a complaint](#)

Post - The Information Commissioner

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Phone - 01625 545700

