

Northern Ireland Hospice Privacy Notice

Introduction

Northern Ireland Hospice (“NIH”, “we”, “us”, “our”), registered charity NIC102337 and company number NI 14817, is the Data Controller for the personal data described in this Privacy Notice. We are committed to protecting the privacy of everyone who interacts with us, including:

- people using our care services (patients, carers and families)
- employees, volunteers and applicants
- education participants
- donors and supporters
- retail and café customers
- members and trustees
- suppliers and service providers.

This Privacy Notice explains:

- what personal data we collect and process
- how and why we do so
- how long we keep it
- the lawful bases we rely on
- who we share it with
- your rights under data protection legislation.

We only use personal data in line with all applicable laws, including:

- the UK General Data Protection Regulation (UK GDPR)
- the Data Protection Act 2018
- other relevant legislation and guidance applicable in Northern Ireland.

1.0 Care Services

We aim to provide the highest quality palliative care. To do this, we must keep accurate and up-to-date records about the care we provide to you.

NIH collects, stores and process personal information about prospective, current and former patients who have been referred to the Hospice, and where relevant, personal information about family members, carers and friends where provided for care purposes (e.g. next-of-kin details).

Lawful Bases

We process personal data for the provision of health and social care under:

- **Article 6(1)(e)** UK GDPR – public task (where services are commissioned by HSC)
- **Article 6(1)(f)** – legitimate interests (for Hospice-funded services)
- **Article 9(2)(h)** – provision and management of health or social care
- **Article 9(2)(c)/(d)** – vital interests or not-for-profit purposes where applicable.

Patient consent is specifically obtained for research activities or participation in certain clinical audit activities where required by law or good practice.

1.1 What Personal Data We Handle

This includes:

- Basic identification and contact details (name, address, date of birth, NHS number, phone number, emergency contacts)
- Next-of-kin information
- Demographic details (gender, ethnicity, religion, sexual orientation)
- Relevant medical information including diagnoses, medications, treatments, and clinical notes
- Information shared by other health and social care organisations
- CCTV images (for safety, security and crime prevention)
- Records held in paper and electronic formats, securely stored in line with our Records and Document Management Policy.

1.2 Purpose of Processing

We use your information to:

- Provide safe and effective clinical care
- Ensure professionals involved in your care have the information necessary to support you
- Review, audit and improve our services
- Investigate concerns or complaints
- Support teaching and training
- Use anonymised or pseudonymised data for audit, service reviews and research.

NIH uses electronic patient information systems, some of which are linked to NHS systems. This enables coordinated care. In shared-system environments, NIH may act as a Joint Data Controller with relevant HSC bodies.

1.3 Sharing Your Information

We share your data only with:

- Health and social care professionals and organisations involved in your care
- Other bodies where required by law or regulatory codes
- Professional bodies in exceptional circumstances

We do not share your data for marketing purposes.

2.0 Donors and Supporters

We collect and use personal data to manage supporter relationships, process donations, administer Gift Aid, communicate updates, and improve fundraising effectiveness.

2.1 Sources of Data

- **Directly from you:** e.g. event sign-ups, donations, communications
- **Indirectly:** e.g. via fundraising platforms (JustGiving, PayPal)
- **Funeral Directors:** where you give permission for in-memory donations
- **Public sources:** e.g. social media (subject to your settings), Companies House, newspapers.

NIH does not buy personal data.

Cookies and device data are used on our website (see Section 8).

2.2 What We Collect and How We Use It

- Name and contact details
- Financial details (for processing payments - handled securely)
- Gift Aid declarations
- Event information (dietary needs, T-shirt sizes, etc.)
- Communication preferences

We use this information to:

- Process donations and Gift Aid
- Provide information you request
- Keep you updated about our work, where permitted
- Maintain accurate supporter records
- Prevent fraud and maintain financial security

Profiling and Screening

To ensure relevant communication and cost-effective fundraising, NIH uses profiling tools, including geographic and demographic analysis (e.g. CACI Acorn).

No profiling results in automated decisions with legal or significant effects.

You have the right to object to profiling at any time.

2.3 Direct Marketing

We may contact you:

- **By post** under legitimate interests, unless you opt out
- **By email or SMS** only with your consent
- **By telephone** only where allowed under PECR rules or with your consent

You may change your preferences at any time by contacting Supporter Care.

2.4 Children's Data

We only collect children's details for participation in specific events or fundraising activities, always with parental/guardian consent. We do not market to children under 16 (other than acknowledgements).

3.0 Employment, Volunteering and Training Records

NIH processes personal data relating to prospective, current and former employees, workers, volunteers and trainees.

Lawful Bases

We process this data under:

- **Article 6(1)(b)** – contract (employment or engagement)
- **Article 6(1)(c)** – legal obligation
- **Article 6(1)(f)** – legitimate interests (e.g. workforce management)
- **Article 9(2)(b)/(h)** – employment, social protection and health

AccessNI checks are processed under safeguarding legislation.

3.1 Data We Handle

Including but not limited to:

- Personal and emergency contact details
- Employment history, qualifications and references
- Right to work documentation
- Payroll, tax, pension data
- Health and safety records
- Occupational health information

- Criminal record data (where required)
- CCTV or photos used for promotional materials (with consent)

3.2 Purposes

- Staff administration, payroll, pension and HR management
- Recruitment and onboarding
- Compliance with employment and safeguarding legislation
- Health and safety monitoring
- Education and training
- Prevention and detection of fraud or crime

3.3 Sharing

We may share data with payroll processors, accountants, occupational health providers, pension schemes, legal advisors, AccessNI, and regulatory bodies. Only necessary data is shared.

4.0 Education Department

We process personal data to administer courses, deliver training (including online learning), manage communications, and process payments.

Lawful Bases

- **Legitimate interests** – delivering education services and running our operations
- **Contract** – providing education services in return for a fee
- **Consent** – for electronic marketing of education courses
- **Legal obligation** – financial records retention

4.1 Data We Collect

- Contact details
- Email correspondence
- Payment card details (processed securely; not stored by NIH)
- Website analytics information (IP address, browser type, etc.)
- Cookies (with consent - see Section 8)

4.2 Use of Data

- Delivering training and materials
- Managing course administration
- Communicating updates (where consented)
- Internal administration and quality improvement
- Handling feedback or complaints

4.3 Sharing

Data may be shared with external trainers solely to deliver relevant training. No data is sold or shared for marketing.

5.0 Retail and Café Operations

We process personal data to complete sales transactions, claim Gift Aid, collect donations, and respond to complaints.

Lawful Bases

- **Contract** – processing retail or café transactions
- **Legal obligation** – Gift Aid
- **Legitimate interests** – operational management

6.0 Members and Trustees

We process Members' data to maintain registers, communicate, process renewals and meet obligations under our Articles.

For Trustees, we process data for Companies House, Charity Commission and regulatory compliance.

Lawful Bases

- **Legitimate interests** – governance administration
- **Legal obligation** – regulatory filings and compliance

7.0 Service Providers

We process business contact information for suppliers, commissioners, funders, banks, advisors and media contacts.

Lawful Bases

- **Contract**: entering into and managing supplier relationships
- **Legitimate interests**: operational requirements
- **Legal obligation**: where applicable

8.0 General Information

8.1 Updating Your Personal Data

Please notify us of any changes to your details. We may also use publicly available sources to ensure accuracy (e.g. Royal Mail postcode lookup).

Contact:

Northern Ireland Hospice
74 Somerton Road
Belfast BT15 3LH
Tel: 028 9078 1836

8.2 Your Rights

Under UK GDPR, you have the right to:

- be informed (this Notice)
- access your data
- request rectification
- request erasure (where no overriding obligation exists)
- restrict processing
- object to processing based on legitimate interests or direct marketing
- withdraw consent at any time (where relied upon)
- data portability (in specific cases)
- not be subject to automated decision-making with legal or significant effects (NIH does not carry this out)

You may complain to the Information Commissioner's Office (ICO).

8.3 How We Protect Your Data

We have organisational and technical measures to keep your data secure, including access controls, encryption and regular audits.

8.4 International Transfers

Personal data may only be transferred outside the UK when permitted under UK GDPR, using:

- UK adequacy regulations,
- the International Data Transfer Agreement (IDTA)
- appropriate safeguards approved by the ICO.

We do not routinely transfer data outside the UK.

8.5 Sharing Your Data

We only share your data where:

- you ask us to
- required by law or regulation
- necessary to protect life or prevent serious harm
- required to detect or prevent fraud
- required to comply with court orders or law-enforcement requests.

8.6 Third-Party Processing

Where third-party processors are used, they are subject to strict contractual obligations and security checks.

8.7 Sharing Your Story

You may choose to tell us about your experiences with life threatening, life-limiting illness as a service user, carer, volunteer, staff member, donor or an Ambassador to help further our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report. Consent can be withdrawn at any time.

8.8 Retention

We retain personal data only for as long as necessary for the purposes for which it was collected.

Retention periods are set out in our Records and Document Management Policy, which follows the Department of Health (NI) Good Management, Good Records framework.”

8.9 Cookies

Our website uses cookies. Non-essential cookies (e.g., analytics) require your consent.

Full details are in our Cookie Policy.

8.10 Changes to This Notice

We may update this Notice from time to time. The latest version will be available on our website. Significant changes may be communicated directly.

8.11 Contact

Data Protection Officer
Northern Ireland Hospice
Horizon House
18 O'Neill Road
Newtownabbey
BT36 6WB
Tel: 028 9078 1836
Email: governanceteam@nihospice.org

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