

Rainbows Information Promise Data Privacy Statements

It's your data and your privacy.
It's our responsibility to secure it

rainbows.co.uk

2022

General Policy and Promise

- We are Cope Children's' Trust a company limited by Guarantee and a registered charity who operate as Rainbows Hospice for Children and Young People. We also have a trading subsidiary called Cope Marketing Limited.
- As a responsible charity, we value the trust you place in us when you shared your personal data.
- It is our promise to you that we will be open and honest about how we use the information you have entrusted with us.
- We take very seriously the security of data you entrust us with. We keep your data in secure networks and servers, either at our hospice in Loughborough or in outsourced UK locations where we have appropriate agreements and security controls in place to keep your data secure. We also have manual archiving of information which we keep secure by physical controls over access.
- We have policies and procedures to ensure data is not lost, accidentally destroyed, misused or disclosed.
- We will use your personal information for the purpose for which you gave it to us and to administer and keep records of your relationship with us and provide you with other relevant information with regard to your relationship with the charity.
- We only hold data which is relevant to your interaction with the charity and will only hold such data for as long as it is needed or required by law.
- We will send you information about the charity, our activities and ways you can support us and will give you opportunities to choose what you receive and how you receive it.
- We recognise your rights under the law and will always observe your request for access, amendment and removal of data.

General Policy and Promise

- We never sell to or share your data with third parties except that we may share such data for limited purposes as detailed later in this promise. When we do so we remain the data controller and ensure that your data is properly kept safe and only used in accordance with the law and our promise to you.
- There are a few exceptional situations where we may have to breach confidentiality and pass on your details without your consent particularly in regards to safeguarding issues or if we are concerned that you are a danger to yourself or others.
- We may share data between our charity and our subsidiary trading company but only as far as necessary to undertake your instructions.
- The following pages give more specific details on different data we hold for different categories of individuals and how that data is used.
- Your rights under GDPR are detailed here.
- This information does not include extensive information for every aspect of how we collect data and use your personal information. For further clarification [please contact us](#) and we will be happy to help.
- For information on our website cookies policy please [visit the cookies information page here](#)

Supporter Data Policy and Promise

- If you support Rainbows or fundraise on our behalf the legal basis on which we hold and use your data is legitimate interest. This means that we will be in touch with you because we believe we have a legitimate interest in doing so and because it is something that you would expect to hear from us about. The basis on which we will communicate with you electronically is consent.
- We will always be respectful of your rights to privacy and will always consider the total quantity of communications individuals will receive from you, and the current status of your relationship with us before communicating with you.
- We will always respect your wishes and will always give you the option to opt out of some or all communications from us.
- We will use data we hold to personalise the information on fundraising activities that we are undertaking.
- We retain data only for as long as necessary and then we securely archive and destroy it.
- We may disclose your personal data to partner organisations (a data processor) that fulfil operational requirements on our behalf - for example if we are using a mailing house or event organiser. We will always ensure we have appropriate control measures in place to secure your data whilst in their control.
- We also need to disclose your data in respective Gift Aid claims to HMRC.
- We may perform screening or profiling in respect of you as a donor for the purpose of personalising the material we may send to you.

Supporter Data Policy and Promise

- We may use your data for statistical analysis of our donors in general for internal purposes of management and developing our activities.
- We may also collect data about you from third party fundraising sites such as Just Giving or Facebook. You should make sure you are comfortable with their information policy when using their website which is not our responsibility.
- We may use third parties to process your data for us in regards to the above relationship but we remain the data controller and will ensure all data is kept safely and is dealt with in accordance with the law and our promise.

- Our commitment to you is that we will:

Never sell your data

Always keep your data secure

Only send you material that is of potential interest to you,

Give you the option to not receive further communications,

Ensure our marketing is controlled and proportionate to ensure supporters do not feel overwhelmed,

Respect your data and your wishes.

Care and Family Support Users

The staff caring for you / your child need to collect and maintain information about you / your child's medical condition, treatment, and care, so that we can give the best possible care. On acceptance of your child / young person for the hospice services we will seek written consent for holding and sharing of information and we will regularly review this consent with you.

Why we collect information about your child

- We receive information about your child from your child, you, your family and from other people involved in their care (e.g. GP, hospital doctors and nurses). We use this information to keep records about their care .
- These Records are stored electronically or on paper and may include:
 - Personal details like their name, address, date of birth, parent/guardian, legal representative.
 - Contacts we have with you like appointments and telephone calls.
 - Notes and reports about their health, treatment and care.
 - Results of x-rays and laboratory tests.
 - Relevant information from people who care for them or know them well
 - Things we are told about wishes and preferences

Care and Family Support Users

How your child's records might be shared

When your child is referred to us and starts to access our services, we check the information with you to make sure it is accurate, and we ask your permission to continue sharing health information with other care providers in the future, so that everyone involved in your child's holistic care has accurate details about them. The types of care providers we normally share with include GPs, Hospital Consultants, community nursing services, social workers, and healthcare co-ordinators.

In these circumstances, we only share relevant information from their Records for medical purposes and if these people have a genuine need for it, or if we are under a legal obligation to do so. If you give us any specific instructions not to share their Records in this way, we will respect this to the extent we are not prohibited from doing so by any legal obligation, although this may affect your child's care. If it will affect care, we will let you know.

We will share some of your details with local NHS partners, such as Clinical Commissioning Groups, to support planning of local health services and funding. Where possible, information shared with NHS partners will be anonymised or pseudonymised to protect your and your child's privacy. Under the National data opt out you have the right to ask us not to share any information for research and planning purposes.

Sometimes we are requested to share information to inform research to improve future care or services. Under the National data opt out you have the right to tell us not to share any of your information.

The national data opt-out was introduced on 25 May 2018, enabling individuals to opt-out from the use of their data for research or planning purposes. For more information on the national data opt-out, please visit www.digital.nhs.uk/services/national-data-opt-out. You can find details here for how you can view and manage your choices.

Care and Family Support Users

Why we collect information about you

If you are a relative of a child accessing support services, we collect information about your health and wellbeing to manage your support needs. This may include details about your emotional wellbeing, mental health, family circumstances and welfare entitlements. This also applies to any brothers or sisters (siblings) of the child we provide care to, if they access our sibling support services.

We will only collect this information from you directly, and we won't share it with anyone without your permission unless there is a legal reason to do so.

Care and Family Support Users

When we might need/ask to use your data for other purposes

We value your input in promoting Rainbows and providing feedback about our services. We will always ask for your consent to use your information when requesting feedback or when involving you in surveys or consultations.

Occasionally we might ask to use your data for publicity and fundraising purposes. We will never do this without your explicit consent which will be reviewed annually. You can withdraw that consent at any point.

In order to ensure that our services continue to be safe and of a high quality we regularly check Care Records and Medicine Charts against our set standards for audit purposes. Data collected is not person specific and is carried out by our nursing staff.

In rare circumstances, we may be obliged to share your information without forewarning or without your consent. For example, if we believe you or your child may be at risk of harm or there is a public health risk, we may have a legal or professional duty to share information about you with the authorities. In all such cases, the sharing will be reviewed by our Caldicott Guardian and will only happen if they believe it is absolutely necessary.

We have a Data Protection officer responsible for compliance with data protection regulations. Rebecca Scrace, Finance and Compliance Manager Email Rebecca.scrace@rainbows.co.uk Tel 01509 638069

We also have a Caldicott Guardian who is responsible for protecting people's confidentiality, in accordance with NHS information sharing rules. Our Caldicott Guardian is Julie Taylor, Executive Nurse and Director of Clinical Services Email Julie.taylor@rainbows.co.uk Tel 01509 638038

As a regulated healthcare provider, we have a Duty of Candour to inform you about mistakes, apologise for them, and support you while we work to resolve them. As a learning organisation we make every effort to ensure mistakes are not repeated.

Staff and Volunteers Policy and Promise

- If you are an existing employee, applicant or volunteer, the legal basis on which we hold and process your data is Legitimate Interest, on the basis that you have provided the data for us to process in respect of your volunteering or employment and we both have an interest in processing that data in relation to this.
- Legitimate Interest will last as long as your service with us.
- If you join us after 25 May 2018, the legal basis will be consent, which we will obtain at the time of your application. This will allow us to process the information if your application is successful.
- If you apply for a role at Rainbows, we will use the information we collect from you to process your application. We will also use it to communicate with you regarding the application, validate any information collected, validate your entitlement to work/volunteer in the UK and, if necessary, assess disability access requirements. Finally, we will use your information to monitor recruitment statistics and exercise specific rights or obligations with regards to the position or you as an applicant.
- Information we collect from employees and volunteers enables us to maintain accurate records of our relationship, communicate with you, process payments required, monitor employment statistics, carry out our obligations and exercise rights in relation to employment/volunteering.
- We may need to request access to records of criminal convictions and offences if necessary for your employment/volunteering.

Staff and Volunteers Policy and Promise

- Your data may be shared internally for the purposes of managing the recruitment process or managing your employment or volunteering with us.
- Your data will only be shared with other organisations as necessary to check your application once you have been offered a position and to process your information for Rainbows benefits and employment taxes.
- We are obliged to share the following information with third parties:
 - Personal and financial information with regard to payroll and pensions management.
 - Personal information with professional bodies and regulators
 - Payroll information with HMRC
- We will only use your data for the purposes outlined and will only contact you using that data for the purposes outlined.
- We will obtain your consent to use your data for any other purpose.
- Data will be held for the following periods
 - Unsuccessful applicants – up to six months after the recruitment process is completed and then securely destroyed
 - Successful applicants – six years after the completion of your service

Contacting us about the data we hold

To update or correct the data we hold please contact the appropriate departments as below:

Relationship	Phone	Email
Donor/Shop customer	01509 638049	supportercare@rainbows.co.uk
Family in care of the hospice		careteam@rainbows.co.uk
Employee/volunteer	01509 283903	jobs@rainbows.co.uk
Other		dataprotection@rainbows.co.uk

To request access to the data we hold about you or to raise a complaint about our use or retention of data, contact either the Data Protection Officer, Caldicott Guardian or Senior Information Risk Owner.

Office	Senior Information Risk Owner	Caldicott Guardian	Data Protection Officer
Name/ Role	Julia Bates Director of People	Julie Taylor Executive Nurse	Rebecca Scrace Finance and Compliance Manager
Phone	01509 283934	01509 638038	01509 638069
Email	Julia.bates@rainbows.co.uk	Julie.taylor@rainbows.co.uk	rebecca.scrace@rainbows.co.uk

Or write to us at the Data Protection Office at Rainbows Hospice, Lark Rise, Loughborough, LE11 2HS

Your rights

Right to be	Explanation
Informed	Our communications with you will include GDPR information and explain your options. The publication of this notice also provides clear and transparent information on the data we hold about you as a data subject
Access	You can request a copy of any data we hold about you
Rectification	You can request we correct any incorrect data we hold about you
Forgotten	In certain circumstances you can ask for your data to be erased from our records
Restriction of processing	When certain conditions apply you can restrict processing of your data
Portability	You can have information transferred from us to another organisation
Object to processing.	You have the right to object to certain forms of processing including direct marketing
Object to automated decision making.	You have the right to object to decisions being made about you solely made by system or technology

If you feel that we have not observed your rights or you have concerns about our use of data, please contact us to discuss the matter.

You have the right to register your concern with the UK Information Commissioners office. You can find the details on their website ico.org.uk



We care for children, young people and their families
in the East Midlands – wherever they are.

Hospice | Hospital | Home



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Rainbows is registered as Cope Children's Trust in England and Wales. Registered Charity No. 1014051.
Registered Office: Lark Rise, Loughborough, Leicestershire LE11 2HS.