

Data Protection Privacy Notice

WelcoMe at NHS Golden Jubilee

About WelcoMe

WelcoMe is an online service platform used by venues to provide enhanced customer service to disabled visitors and customers. The disabled users can access the platform via the web application or via widgets to create a profile with their disability requirements and send it to a venue in advance of their planned visit. This enables the venue staff to gain valuable tips and advice around the user's needs and requirements.

NHS Golden Jubilee are notified of the visit request and receive an overview of the service users disability, including photos to assist with identification and disability awareness refreshers from a diverse list of common and less well known conditions to facilitate meaningful and person centred interaction. Additionally, the platform enables staff to get in touch with service users to update them of any changes to their visit and manage expectations accordingly

Patients will receive an information leaflet when they receive their appointment letter, which will explain what the WelcoMe platform can provide and what they need to know if they decide to register with the app.

A Data Protection Impact Assessment (DPIA) has also been completed to support the data processing within this initiative.

WelcoMe Data Protection Privacy Notice can be viewed on their website, follow the link below for more details:

[Privacy Policy 1 \(wel-co.me\)](#)

About NHS Golden Jubilee

NHS Golden Jubilee is a public organisation created in Scotland under the National Health Service (Scotland) Act 1978 (the 1978 Act). It is one of the organisations which form part of NHS Scotland (NHSS).

The NHS Golden Jubilee, which is the brand name for the National Waiting Times Centre Board, is a registered Data Controller on the Information Commissioner's Office (ICO) website.

The Data Controller registration number on the ICO website for NHS Golden Jubilee is **Z7996020**.

About the personal information we use

NHS Golden Jubilee will access the data you provide to the WelcoMe platform, via our organisational account. This is to enable us to review requests within the system and ensure we can provide an enhanced level of person centred care for patients with a disability/long term health condition accessing services at NHS Golden Jubilee. Only the relevant staff, who already have access to your information as part of your ongoing care, will have access to your information on the WelcoMe platform. Once the visit request has been completed, the patient information is removed from the app.

The information provided about patients involves the following information:

- Patient's name
- Community Health Index Number (CHI number)
- Telephone number
- Appropriate and proportionate health information in relation to the specific service the patient is receiving

Only the relevant clinical information about you is accessed by the team here at NHS Golden Jubilee. The Information will only be accessed of patients who agree to be part of the WelcoMe platform.

Our purposes for using personal information

Under the 1978 Act NHS Golden Jubilee has the statutory responsibility to provide or arrange for the provision of a range of healthcare, health improvement and health protection services. We are given these tasks so that we can help to promote the improvement of the health and wellbeing of our patients and assist in operating a comprehensive and integrated national health service in Scotland.

We use personal information to enable us to provide healthcare services for patients, data matching under the national fraud initiative; research; supporting and managing our employees; maintaining our accounts and records and the use of CCTV systems for crime prevention.

Our legal basis for using personal information

NHS Golden Jubilee, as data controller, is required to have a legal basis when using personal information.

NHS Golden Jubilee considers that performance of our tasks and functions are in the public interest. So, when using personal information our legal basis is usually that its use is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in us.

In some situations, we may rely on a different legal basis; for example, when we are using personal information to pay a supplier, our legal basis is that its use is necessary for the purposes of our legitimate interests as a buyer of goods and services. Another example would be for compliance with a legal obligation to which NHS Golden Jubilee is subject to, for example under the Public Health etc. (Scotland) Act 2008 we are required to notify Health

Protection Scotland when someone contracts a specific disease.

When we are using more sensitive types of personal information, including health information, our legal basis is usually that the use is necessary:

- for the provision of health or social care or treatment or the management of health or social care systems and services; or
- for reasons of public interest in the area of public health; or
- for reasons of substantial public interest for aims that are proportionate and respect people's rights, for example research; or
- in order to protect the vital interests of an individual; or
- for the establishment, exercise or defence of legal claims or in the case of a court order

On rare occasions we may rely on your explicit consent as our legal basis for using your personal information. When we do this we will explain what it means, and the rights that are available, to you. You should be aware that we will continue to ask for your consent for other things like taking part in a drug trial, or when you are having an operation.

Who provides the personal information?

NHS Golden Jubilee will already receive personal information about patients, who have agreed to be referred here for their treatment, from individual Health Boards. If patients provide additional support request information to the WelcoMe platform, then we will have access to this information via our organisational account to the app.

The personal and health information shared with the WelcoMe platform is limited to only what is necessary for the purpose of the service we are providing.

Sharing personal information with others

The data will only be shared between the information that the patient provides on the WelcoMe platform and the appropriate staff here at NHS Golden Jubilee for the purposes outlined above. NHS Golden Jubilee will not share this information with anyone else and only the relevant staff will have access to this data via the organisational account.

Transferring personal information abroad

Personal data of patients will not be transferred outside of the United Kingdom.

Retention periods of the information we hold

Patient information will be held securely (electronically) on the WelcoMe platform until the visit has been completed. Once the visit request has been completed, the patient information is removed from the WelcoMe platform.

How we protect personal information

We take care to ensure your personal information is only accessible to authorised people. Our staff have a legal and contractual duty to keep personal health information secure, and confidential.

The following security measures are in place to protect personal information:

- All staff undertake mandatory training in Data Protection and IT Security
- Compliance with Scottish Government Public Sector Cyber Resilience Framework
- Organisational policy and procedures on the safe handling of personal information
- Access controls and audits of electronic systems

Your rights

This section contains a description of your data protection rights within NHS Golden Jubilee.

The right to be informed

NHS Golden Jubilee must explain how we use your personal information. We use a number of ways to communicate how personal information is used, including:

- This Data Protection Notice
- Our main Data Protection Notice (<https://www.nhsgoldenjubilee.co.uk/site-information/privacy-policy>)
- Information leaflets
- Discussions with staff providing your care

The right of access

You have the right to access any data we may hold about you. Any request in relation to right of access for information within the WelcoMe platform will be managed by NHS Golden Jubilee following the standard processes already in place for right of access requests.

The first point of contact for this is ig@gjnh.scot.nhs.uk

The right to rectification

If you identify an error in the information we hold about you, you have the right to request rectification. You can also rectify information via your access to the WelcoMe platform. Any information that NHS Golden Jubilee hold that you require rectified can be done by requesting via ig@gjnh.scot.nhs.uk

The right to object

The patient can, at any time, withdraw from using the WelcoMe platform. NHS Golden Jubilee will no longer receive requests via the WelcoMe platform, however, we will still process your information on our NHS systems if you agree to be referred to us for treatment from your local NHS Board.

Right to restrict processing (where applicable)

Requests to restrict the right to processing will be managed under the current NHS Golden Jubilee processes and will be assessed if such a request is made.

Right to data portability (where applicable)

Information can be supplied in different formats if requested.

Right to erasure (where applicable)

This right does not apply in these circumstances involving health records.

Rights in relation to automated decision-making and profiling (where applicable)

This does not apply in these circumstances as there will be no automated decision making or profiling involved in the data processing.

The right to complain.

NHS Golden Jubilee employ a Data Protection Officer (DPO) to check that we handle personal information in a way that meets data protection law. If you are unhappy with the way in which we use your personal information, please tell our Data Protection Officer using the contact details below.

Mrs Sharon Stott
Head of Digital Governance/DPO
eHealth Department
Golden Jubilee National Hospital
Agamemnon Street
Clydebank, G81 4DY

Tel: 0141 951 5765

Email: Sharon.stott@gjnh.scot.nhs.uk

You also have the right to complain about how we use your personal information to the Information Commissioner's Office (ICO). Details about this are on their website at www.ico.org.uk.