

## **Privacy Notice (individual advocacy clients)**

### **Introduction**

North Wales Community Health Council, NWCHC, (referred to in this notice as "the CHC" "we", "us" or "our") treat privacy and confidentiality very seriously. We comply with all aspects of the UK's data protection legislative framework, which includes the European General Data Protection Regulation (GDPR) and the UK's own legislation.

This is a summary privacy notice that gives you key information about how we use your personal information. For more information, please refer to our full Privacy Notice which is available on our website or request a copy from our Information Governance Officer (IGO).

### **Data Controller and Data Protection Officer**

Your information will be held by the CHC as Data Controller or sometimes the CHC and the Board of Community Health Councils in Wales (The Board) as joint controllers. We have appointed a dedicated Information Governance Officer (IGO) to ensure appropriate oversight of our data processing activities. The IGO, Sue Irlam is the Business Manager. The IGO, guided by the Data Protection Officer (DPO) is Geoff Ryall-Harvey, the Chief Officer, can provide any clarity that you may have about this privacy notice. Contact details below:

Sue Irlam  
Business Manager  
North Wales Community Health Council  
Unit 11 Chestnut Court  
Parc Menai  
Bangor, LL57 4FH  
Telephone: 01248 697164  
Email: [sue.irlam@wales.nhs.uk](mailto:sue.irlam@wales.nhs.uk)

### **Why do we collect and use your personal information**

The primary reason the CHC collects and uses your personal data is in connection with the provision of advocacy services to you. Specifically, our statutory functions include providing a

complaints advocacy service for individuals who wish to make a complaint about NHS treatment they have received and we may process your information in the course of exercising these functions. We may also process your information in the course of liaising with the Board so that advocacy assistance can be arranged for you, or in the course of dealing with any complaint you may have about the advocacy service provided by us. It is lawful for us to do this because it is necessary to collect and use your personal data in order to fulfil a public function.

In the course of carrying out our functions, we are likely to learn information about you. You may tell us most of this yourself, but we will also generate some of it and we will receive information about you from others involved in your matter. We may also supplement the information we have from publicly available sources.

It is possible that this will involve personal information that falls into one of the special categories recognised in the data protection legislation. It is lawful for us to do this where it is necessary for reasons of public interest in the area of public health, the establishment, exercise or defence of a legal claim or you consent by giving us the information voluntarily.

### **Sharing your information**

We share your personal data with third parties in order to carry out the public functions listed above. In particular we may share your information with the Board or the Public Services Ombudsman for Wales. We may also share your information with the Local Health Board, NHS Trust, general practitioner or other healthcare provider who provided treatment to you, but only to the extent that this is necessary for the provision of an advocacy service to you. In some cases we might also share information with another CHC if you require an advocacy service through the medium of Welsh and we are not able to provide this service.

Your personal data may also be shared with other third parties such as Welsh Government, our insurers and professional advisers and third parties who supply goods and services to us, in order to allow us comply with our reporting and legal

requirements and to enable us to run our organisation effectively.

We do not sell, rent or otherwise make personal information commercially available to any third party.

### **Personal information you share with us**

The law allows us to collect and use personal information about others in the course of providing you with advocacy services. If you wish to give us personal information about another person, please speak to us to ensure that you are legally entitled to give us the information and for advice on whether you need to inform that person.

### **How long do we keep personal information**

Our policy is to not hold personal information for longer than is necessary. We have established data retention timelines for all of the personal information that we hold based on why we need the information and captured this in our Data Retention Policy. We delete or destroy personal information securely in accordance with the Data Retention Policy.

On the completion of your case, we will generally keep the personal information relevant to it for a period of six years from closure, although there may be a different retention period for some of your information and if so, this will be specified in our Data Retention Policy.

### **Security**

We are strongly committed to information security. We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us including the use of encryption and pseudonymisation. If you wish to discuss the security of your information please contact us.

### **Privacy Rights**

Individuals have a number of rights under the data protection legislation. Our full Privacy Notice contains full details of all of the rights, although please be aware that not all of the rights will apply to you.

## **How to Complain**

Please let us know if you are unhappy with how we have used your personal information. To do this please contact our IGO:

Sue Irlam  
Business Manager  
North Wales Community Health Council  
Unit 11 Chestnut Court  
Parc Menai  
Bangor, LL57 4FH  
Telephone: 01248 697164  
Email: [sue.irlam@wales.nhs.uk](mailto:sue.irlam@wales.nhs.uk)

You also have the right to complain to the Information Commissioner's Office. More information about this is available on the ICO's website [www.ico.org.uk](http://www.ico.org.uk)