



Healthworks
the community health charity

The Health Resource Centre, Adelaide Terrace, Newcastle upon Tyne NE4 8BE

Tel: 0191 272 4244

Health Improvement: Community Wellbeing Pathfinders Privacy Notice

Who are we?

Healthworks is a charity/not-for-profit organisation providing a wide range of specialist services on behalf of the NHS, Local Authorities, ICS and Universities among others, to address health inequalities and their impact on the health of the people within our population, the social determinants of health and the impact these have on our most disadvantaged communities across Newcastle and the North East.

The Community Wellbeing Pathfinder Service is a free, personalised support service delivered by Healthworks, aimed at helping adults (18+) in the Newcastle upon Tyne area improve their overall wellbeing and life circumstances. We run this service on behalf of Newcastle City Council, who fund and manage the programme.

This means that:

- Newcastle City Council is the Data Controller (they decide what information is collected and how it is used).
- Healthworks Newcastle is the Data Processor (we collect, store and use the information safely on their behalf).

Contact details:

Data Controller (Newcastle City Council)

Data Protection, Newcastle City Council, Floor 6, Civic Centre, Barras Bridge, Newcastle upon Tyne, NE1 8QH

Data Protection Officer: Phil Slater

Email: dataprotection@newcastle.gov.uk

Data Processor (Healthworks Newcastle)

Healthworks, Health Resource Centre, Adelaide Terrace, Newcastle upon Tyne, NE4 8BE

Tel: 0191 272 4244 | Email: data.protection@hwn.org.uk

ICO Registration Number: Z6958810

What this notice covers:

This Privacy Notice explains:

- What personal information we collect about you
- How and why, we use it
- Who we share it with and how we protect it
- Your legal rights and how you can contact us about your information

We are committed to protecting your privacy and ensuring your information is used fairly, stored safely, and handled in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal data and special categories of personal data

Personal data is defined by the UK General Data Protection Regulation (Regulation 2016/679) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified.

For us to provide you with a service, we need to collect personal data, including health information which is a special category of personal data. We are committed to ensuring that the information we collect, and use, is appropriate for this purpose and does not constitute an invasion of your privacy.

We will process (collect, store and use) the information you provide in a manner compatible with the UK's General Data Protection Regulation (GDPR).

We will endeavour to keep your information accurate and up to date and not keep it longer than necessary.

What personal data do we collect?

In accordance with the Health and Social care Act 2012 and Health and Social Care (Quality & Safety) Act 2015, personal and sensitive information we will collect from you may include:

- The reasons for referral and information supplied by your GP, medical advisor, NHS referrer or other referrer. This will include your name, date of birth, address, contact telephone numbers, email address and certain health information.
- The information supplied by you at first contact and in your assessment session, with additional information from professionals where applicable.
- Assessments and plans relating to your intervention or support.
- Summary records of your intervention and support.
- Copies of any letters or emails sent to you or received from you.
- Details of any telephone conversations with you.

We collect this personal information to provide treatment services to you (including communicating with you, your GP, your NHS referrer, other medical advisors, care and support providers as appropriate).

We securely store your information on our electronic care records system and in paper form.

Why do we collect information about you?

At Healthworks, we collect and process personal data in order to provide you with the best and most appropriate support. This is essential in helping us to:

- Understand your needs and assess your suitability for the service
- Provide and tailor wellbeing support to you
- Keep records of the support and progress we provide
- Contact you about your sessions or follow-ups
- Monitor and evaluate the service to make sure it's effective and reaching the right people
- Report anonymised information to Newcastle City Council (for example, how many people were supported and what outcomes were achieved)
- Meet our legal and safeguarding responsibilities
- Improve future services through research, learning and quality reviews

Legal basis

Under UK data protection law, we must have a lawful reason to use your information. For the CWP service, these are:

For personal data (Article 6 UK GDPR):

- Public task: To deliver a service in the public interest on behalf of Newcastle City Council.
- Legal obligation: To meet legal duties around public health and safeguarding.
- Contract: To deliver the service as set out in the agreement between the Council and Healthworks.
- Consent: Where you choose to share specific details or agree to be contacted about other support.

For special category (sensitive) data (Article 9 UK GDPR):

- Explicit consent from you (as recorded on the service consent form)
- Provision of health or social care
- Public health purposes
- Statistical or research purposes (where information is anonymised)

How your information is stored and protected

Your information is stored securely in the following systems:

- Evide Impact Tracker: used by Healthworks to record your case notes, progress and outcomes.
- Outcomes Star / Star Online: a secure national system managed by Triangle Consulting Social Enterprise Ltd, used for wellbeing assessments.

Only authorised Healthworks staff involved in your support can access your data. Both systems use strong encryption and password protection. Healthworks follows National Cyber Security Centre (NCSC) guidance to keep all electronic data safe, and paper records (if used) are stored in locked cabinets in secure offices.

Who do we share your information with?

Healthworks has a data protection policy which means that relevant information is only shared with people involved in your health care. This will include:

- Staff engaged by us to carry out our services to you.
- Your GP.
- Your local NHS service if this is appropriate.
- The Department of Health and other statutory bodies to whom Healthworks is required to submit data.
- Local audits within Healthworks, including the management of untoward or adverse incidents, person satisfaction and measurement of outcomes.

We will only consider sharing your personal information with other organisations or professionals where we consider that it is an important part of delivering effective intervention. For example, if the Community Wellbeing Pathfinders service stops being delivered by Healthworks, your personal information will not be kept by us.

Instead, it will be securely returned to Newcastle City Council or transferred to a new approved provider (acting as the new Data Processor) under the same data protection rules.

We do share your information with consent; however, we can also share your information when there is another legal basis to do so.

There may be occasions when we are legally required to share your personal data. This includes sharing information for the prevention of harm to yourself or others, child protection, the prevention, investigation and detection of a serious crime, including terrorism, or a Court Order. In these circumstances, Healthworks will always do its best to notify you of the sharing of information and only share the minimum information required for the purpose.

We only share information with your family, friends, or advocates with your explicit consent. You have the right to refuse/withdraw your consent to this sharing at any time.

Some of our services work with partner organisations who we share information with. For details of which partners we work with, within specific teams, please contact your service.

How long we keep your information

Your information will be kept for seven years after your case is closed, in line with Newcastle City Council's Data Retention Policy and the NHS Records Management Code of Practice.

After this time, it will be securely destroyed using approved methods such as shredding or secure digital wiping.

NHS Digital

Some of our services within Healthworks share anonymised information with NHS Digital to help achieve better outcomes and experiences of care. The information is securely sent to NHS Digital, which is the central organisation that receives the same data from all NHS-funded services across England.

The type of anonymous information includes demographics (such as postcode or ethnicity), referral, treatment and outcomes details.

This information is used to produce anonymised national reports that show a summary of, for instance, the numbers of patients referred to different services across the country, average waiting times and outcomes. The reports help the NHS to improve the care it provides.

No information that could reveal your identity is used in these reports.

For more information about how NHS Digital uses data, including their lawful basis for processing, how long they hold it, and your rights, please visit: <https://www.nhs.uk/your-nhs-data-matters/> Or, call: 0300 303 5678.

The National Data Opt-Out

The national data opt-out was introduced on 25 May 2018, enabling service users to opt out of the use of their data for search or planning purposes. This is in line with the recommendations of the National Data Guardian's Review of Data Security, Consent and Opt-Outs.

You can view or change your national data opt-out choice at any time by using the following link: www.nhs.uk/your-nhs-data-matters .

If you require more information about the national opt-out, please visit: <https://digital.nhs.uk/services/national-data-opt-out>

Service evaluation

Our services are always looking to demonstrate which interventions positively impact our service users. Therefore, we actively participate in service evaluation work. When conducting evaluations, we will gather information about the impact of the interventions we deliver. In some instances, we will use data to support external research and evaluation. In all instances, any data used in research and evaluation is completely anonymised before it is shared outside of the organisation or published externally.

Your rights as a data subject

At any point while we are in possession of or processing your personal information, you have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you. You will need to provide a form of ID to access this.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to erasure – in certain circumstances you can ask for the data we hold about you to be erased from our records; however, there are exceptions to the right to erasure and Healthworks are legally required to maintain your records in accordance with the retention guide.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

You can find out more about your rights under the UK's data protection laws at www.ico.org.uk

To exercise your rights, you can contact either:

Healthworks Data Protection Officer

Email: data.protection@hwn.org.uk | Tel: 0191 272 4244

or

Newcastle City Council Information Management Team

Email: dataprotection@newcastle.gov.uk

Complaints

If you wish to make a complaint about how your personal information is being processed by Healthworks (or third parties as described), you can contact the Data Protection Officer using the contact details above.

If you are not satisfied with how your complaint has been, or is being, handled, you have the right to lodge a complaint directly with the Information Commissioners Office who is the identified supervisory body:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0330 8303 0338

www.ico.org.uk

Changes to this privacy notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website www.healthworksnc.org.uk

How to contact us

To contact us about anything to do with your personal data and data protection, including to make a request for access to your records (subject access request), please contact our Data Protection Officer (DPO):

FAO Data Protection Officer

Healthworks

Health Resource Centre,

Adelaide Terrace

Newcastle upon Tyne

NE4 8BE

Tel: 0191 272 4244

Data.protection@hwn.org.uk

Data Protection Impact Assessments

For more information relating to our Data Protection Impact Assessments, please contact the Data Protection Officer at Data.protection@hwn.org.uk

Information Governance Policies and Procedures

If you would like a copy of, or have any queries regarding, our IG Policies and Procedures, please contact our Data Protection Officer at data.protection@hwn.org.uk

Organisations Healthworks shares information with:

Data processors are third parties who we instruct to provide services for us. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. Our main current data processors are listed below:

Organisation	Reasons for processing	Link to Privacy Policy
Evide (Impact-Tracker)	For Health Improvement Intervention	https://hwn.impact-tracker.net/site/page?view=privacy
Quit Manager	For Stop Smoking Intervention	https://www.bionical.com/privacy-policy
Triangle Consulting	For Star Online data	https://outcomesstar.org/privacy-policy/
Sportfin	Impact demonstration and evidence	https://www.sportfin.io/privacy
PharmOutcomes	Community Stop Smoking NRT voucher issuing	https://www.emishealth.com/privacy-policy
RedCap	Online and offline data capture for research studies	https://projectredcap.org/software/mobile-app/privacypolicy/