

Privacy Information

PRIVACY NOTICE – THE VISITOR BOOKING SYSTEM (VBS) AND YOUR DATA

1. Introduction

As Coronavirus restrictions are easing, there is a need to implement a solution that protects patients admitted in hospitals. Patients should be able to have family and friends visit in hospitals, however consideration to who can visit and their covid status will need to remain to protect the vulnerable in care. VBS itself is not a new concept to hospitals, it will replace current manual processes already in place within hospitals, which are based on paper appointments booked via telephone. Due to the dependency on bed management systems, it will not replace the current manual processes in all inpatient wards, it will provide an alternative process/access to visiting.

The VBS will enable nominated visitors to book appointments to visit friends and family admitted in hospitals using a booking portal accessible from a PC/laptop or smartphone.

The Southern Health and Social Care Trust (SHSCT) will be the sole Data Controllers for booking information processed in the VBS. SHSCT will manage the administration, appointment booking management and management of nominated visitor lists provided by patients within VBS.

2. Background – Visitor Booking System

Visitor Booking System (VBS) has been commissioned by Digital Health Care Northern Ireland (DHCNI) and will be hosted on Belfast Trust infrastructure. The current process in place within hospitals is performed by hospital admin staff manually booking visitor appointments via telephone calls. This system will support easier track and trace of individuals if infection has been reported, allow easier access to patients for visitors and increase efficiency for hospital administration staff with booking visitor appointments.

The VBS solution provides citizens with an easily accessible, streamlined process for obtaining a hospital visitor appointment, to visit patients admitted for hospital care.

The scope of the VBS covers both a digital and telephone-based solution. Request by nominated patient visitors should be booked through the visitor booking website, however for citizens who do not have access to digital technologies or cannot use the digital booking channels they will be able to book visits via telephone.

3. Why are you processing my personal information?

The Visitor Booking System has been developed by an existing DHCNI software partner Civica, who are a data processor for the VBS. Several organisations who process your data are needed to produce, record, and manage VBS. These data processors work under strict instruction from the data controllers for the VBS. These processing organisations process your personal data for the following purposes:

- **BigMotive** – develop the VBS user app and webpages where your data is entered
- **Department of Finance, NI Direct/ NIDA** - NI Direct will process your data as part of the identity checking service they provide for citizens – ‘The NICS Identity Assurance service (NIDA)’. Use of NIDA along with the SureCert Service delivered by NI Direct provides a real-time ID and

Biometric identity checking service, to enable citizens to prove their identity to access government services.

- **Belfast Health and Social Care Trust (BHSCT)** hosts the VBS data and application on their infrastructure.

4. What information is collected?

If you use the Visitor Booking System to obtain an appointment to visit a hospital patient, you will be directed to use your NIDirect account. If you do not have an NIDirect account, you will be needed to create a new account, provide the details outlined below and agree to terms and conditions of using the service. The privacy notice for NI Direct can be found [here](#).

- Full Name
- Date of Birth
- Postcode
- Mobile Number
- ID verification document (passport or driving licence)

Please note that the Visitor Booking System (VBS) will never:

- Ask you to dial a premium rate number (for example, those starting 09 or 087) to speak to us.
- Ask you to make any form of payment or purchase a product of any kind.
- Ask for any details about your bank account.
- Ask for your social media identities or login details, or those of your contacts.
- Ask for any passwords or PINs or ask you to set up any passwords or PINs over the phone.
- Ask you to download any software to your PC or ask you to hand over control of your PC, smartphone, or tablet to anyone else.
- Ask you to access any website or smartphone application that does not belong to the Government, or HSC.

5. The lawful basis for processing your personal information

We process your personal information according to the UK General Data Protection Regulation and the Data Protection Act 2018, which will be referred to as Data Protection legislation. Your data is processed for VBS as part of our public task (in line with UK GDPR Article 6(1)(e))¹.

The Dept of Health, Southern Health and Social Care Trust and Belfast Health and Social Care Trust statutory duty, is outlined in the Health and Social Care (Reform) Act (Northern Ireland) 2009, as below:

- Section 2(1) the duty to promote in Northern Ireland an integrated system of health care designed to secure improvement in the physical and mental health of people in Northern Ireland and in the prevention, diagnosis, and treatment of illness, and
- Section 2(3)(g) the duty to secure the commissioning and development of programmes and initiatives conducive to the improvement of the health and social well-being of people in Northern Ireland, and
- Section 3(1)(b) the power to provide, or secure provision of, such health and social care as it considers appropriate for the purpose of discharging its duty under section 2; and do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of that duty.

¹ This refers to the processing that is necessary for the performance of the official tasks carried out in the public interest.

Some of the data processed relates to health data which is described. In relation to that processing, the following UK GDPR conditions apply:

- Article 9(2)(i) – the processing is necessary for reasons of public interest in public health.
- Data Protection Act 2018 Schedule 1, Part 1 (2) – Health or Social Care Purposes
- Data Protection Act 2018 – Schedule 1, Part 1 (3) – reasons of public interest in public health

6. How will my data be processed?

Your data will be processed in line with data protection legislation requirements and in a manner that ensures appropriate security of your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

7. Do I need to give my consent?

While you will voluntarily choose to use the VBS service, we do not process your data based on consent in relation to data protection legislation (see section 5).

8. Where do you get my personal data from?

Much of the data we use will have been provided directly by you when you book a visitor appointment, or when you call the relevant trust to manually book a visitor appointment. To support this the VBS will receive data directly from:

- Information you provided when booking your visitor appointment
- Information provided by the patient or an authorised representative of the patient, to validate your name against the approved list of authorised visitors
- Data you enter onto the NIDA/Surecert portal for the purpose of identity verification when you access the portal on NI Direct to prove your identity.

9. Do you share my personal data with anyone else?

We may share your data with organisations who carry out functions on our behalf as 'data processors', in relation to the VBS. Details of the data processors has been added in Annex A.

We will not disclose any personal information provided by you to anyone other than data processors (see list in Annex A), unless legally required to do so.

10. Do you transfer my personal data to other countries?

No. Your data will be processed within the UK.

11. How long do you keep my personal data?

We will only retain your personal data for as long as necessary, in line with our Retention and Disposal Schedule (28 days after the hospital visit). For complaints (see section 13) or cases where additional checks or more data are needed to support verification (e.g., the name you provide online does not match your name on your passport/driving licence), we may need to retain your supplied data/call centre calls/emails for up to a year. In all cases your data will be deleted once any queries or investigations are complete in line with Retention and Disposal Schedule.

12. What rights do I have?

The GDPR sets out the 8 rights that individuals have in respect of their data. These have been considered in respect of the Visitor Booking System as follows:

a) The right to be informed

Individuals are provided with information about the collection and use of their personal data for the VBS, including what personal data is collected, the purposes for collecting, retention periods and potential sharing of data, as part of this privacy notice.

b) Right of access

Individuals can ask for copies of the information that we hold about them. Individuals can contact the respective DPO as provided in Section 13 of this document.

c) Right to rectification

Individuals can ask to have inaccurate personal data corrected or completed if it is incomplete. Individuals can contact the respective DPO as provided in Section 13 of this document.

d) Right to erasure

GDPR introduced a right for individuals to have personal data erased ('the right to be forgotten'), however the right is not absolute and only applies in certain circumstances.

e) Right to restrict processing

Individuals have the right to request the restriction or suppression of their personal data, however the right is not absolute. While individuals can request that VBS stops processing their data, data will be held as set out in number 'd' above.

f) Right to data portability

Individuals can ask VBS to share their information with another organisation (although this may not always be possible).

g) Right to object

Individuals have the right to object to the processing of their personal data, including when the lawful basis for processing is public task. However, this is not an absolute right, and processing can continue if there are compelling legitimate grounds for the processing, which override the interests, rights, and freedoms of the individual.

h) Rights relating to automated decision-making

Individuals will not be subject to solely automated decisions which may have a legal or significant impact on their rights

If you want more detailed information on these rights, this can be found on the ICO website, at: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

13. How do I complain if I am not happy?

The VBS follow the Health and Social Care Complaints Procedure. The details of which can be found [here](#).

If you have a specific issue, or complaint, regarding the VBS, please contact:

- ServiceUserFeedback@southerntrust.hscni.net

If you are unhappy with how your personal data is being processed by the VBS please contact:

- FOI.Team@SouthernTrust.hscni.net

If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). Should you have any concerns about how your data has been handled or remain dissatisfied with any response regarding the processing of your personal data, you can raise these concerns with the ICO, as follows:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK0 5AF
Tel: 0303 123 1113
Email: icocasework@ico.org.uk
<https://ico.org.uk/global/contact-us/>

14. Changes to this Privacy Notice

This Privacy Notice will be kept under regular review and any updated versions will be placed on our website.

15. Useful links

Users can also refer to the following links for further information:

NIDA Privacy Notice

<https://www.nidirect.gov.uk/articles/nidirect-web-service-privacy-notice>

Annex A

All data processors are appointed under Data Processors Agreements in compliance with Article 28 of the UK GDPR, either via UK GDPR compliant contracts, or MoUs.

Under the terms of these arrangements DOH is the data controller responsible for assessing that all processors listed below, except DoF/ESS, are competent to process personal data in line with UK GDPR requirements. DoH is responsible for assessing that DoF/ESS are competent to process data in line with UK GDPR requirements under these arrangements. This assessment will consider the nature of the processing and the risks to the data subjects.

Under Article 28(1) DOH will ensure that only processors that can provide “sufficient guarantees” (in terms of its expert knowledge, resources, and reliability) to implement appropriate technical and organisational measures to ensure the processing complies with the UK GDPR and protects the rights of individuals. DoH will ensure the same regarding DoF/ESS.

Contracts or Memorandum of Understanding (MoUs) will be in place to govern relationships with the data processors, which set out the obligations of each party and the data controllers’ obligations and rights regarding the data that is being processed. All contracts adhere to established BSO Procurement and Logistics Services (PaLs) processes and legal input provided by BSO Department of Legal Services (DLS).

All data processing takes place within the UK area and as such is subject to legislation in the form of the UK - General Data Protection Regulation (GDPR).

The following provides a list of data processors involved in delivery of the system.

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