Privacy Notice – Digital Innovation Unit - Programme of Digital Care

Who are we and what do we do?

The Digital Innovation Unit works across The Royal Wolverhampton NHS Trust and Walsall Healthcare Trust to support develop and improvement of digital technologies that help deliver safer, more efficient, and more personalised care.

Our Programme of Digital Care integrates information from acute, primary, and community services to support joined-up care and improve direct patient outcomes.

We want you to feel confident about how and why we use your personal information. This statement fulfils a legal requirement to inform you as the patient as to what happens with your personal information and what rights you have in relation to such data.

What information do we collect about you?

At The Royal Wolverhampton NHS Trust, we are committed to providing safe, effective care to the highest standards. Our team supports this by developing and improving digital technologies that help health professionals access accurate and up-to-date information about your care.

We work to ensure that digital systems across Acute, Primary Care, and Community services are connected, so your health information is securely shared between the right teams, at the right time. This helps make your care more joined-up and seamless.

The information we hold may include:

- Your name, date of birth and contact details
- Details about your health, illnesses, or medical history
- Records of your appointments, treatments, and care plans
- Test results, scans, and other relevant health information

Why do we collect your information?

We use information about you to ensure you receive the safest, most effective care possible. This information helps us to:

- Understand your individual health needs, so care can be tailored to you
- Plan and coordinate your treatment, ensuring the right support is in place at the right time
- Work closely with other health and care professionals involved in your care, such as your GP, hospital teams, and community services
- Review and improve the quality of our services, helping us to deliver better care for you and others
- Your information is handled securely and used only when necessary to support your care or improve services, in line with data protection laws and NHS guidance.

How do we use your information and what is the legal basis?

We use your information to:

- Diagnose and treat illnesses or conditions
- Manage your healthcare and treatment
- Share information with others involved in your care
- Improve our services through planning and quality checks

Legal reason for using your data:
As part of our work to support digital innovation across The Royal Wolverhampton NHS Trust and Walsall Healthcare Trust, the Digital Innovation Unit (DIU) helps develop and improve technologies that enable safer, more eficient, and more joined-up care. While we do not directly deliver patient care or hold paper records, we support the integration of digital systems that allow health professionals to access accurate and timely information.

The Trust is the data controller and must establish a lawful basis for processing personal data, including special category (sensitive) data. The DIU operates under the Trust's governance and data protection policies, and the following lawful bases apply to the digital systems and innovations we support:

Type of processing	GDPR Article 6 Condition for personal data	GDPR Article 9 Condition for special categories (sensitive data)	Statutory basis or other relevant conditions
Lawful basis for direct care and administrative purposes All health and adult social care providers are subject to the statutory duty to share information about a patient for their direct care. This would also include (a) preventive or occupational medicine, (b) the assessment of the working capacity of an employee, (c) medical diagnosis, (d) the provision of health care or treatment, (e) the provision of social care, or (f) the management of health care systems or services (g) waiting list management (h) performance against national targets	Article 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of oficial authority (e.g. supporting NHS services).	Article 9(2)(h) – Processing is necessary for the provision of health or social care or the management of health or social care systems.	NHS Trusts National Health Service and Community Care Act 1990 NHS England's powers to commission health services under the NHS Act 2006 or to delegate such powers 251B of the Health and Social Care Act 2012

(i) activity monitoring (j) local clinical audit			

These provisions apply to the digital tools and platforms we help implement, which support:

- The secure sharing of patient information across Acute, Primary Care, and Community services.
- The management and improvement of health care systems.
- The delivery of seamless care through integrated digital records.

All processing activities supported by the DIU are carried out in line with NHS data protection standards, and we work closely with clinical, operational, and information governance teams to ensure compliance.

Who do we share your information with?

To support the safe and efective delivery of your care, we may share relevant information about you with the following organisations:

- Department of Health and other NHS bodies
- Integrated Care Boards (ICBs)
- Hospitals and other healthcare providers involved in your care
- General Practitioners (GPs) – including those outside Wolverhampton if you are registered elsewhere
- Ambulance services
- Mental health services
- Social care services

In some cases, and only with your consent and under strict data-sharing agreements, we may also share information with:

- Education services
- Local authorities
- Voluntary sector organisations
- Private sector providers

We may also share your information with authorised individuals or organisations for the following purposes:

- To review the quality and efectiveness of the care and advice we provide
- To protect public health
- To manage and improve NHS services
- To investigate concerns or complaints raised by you or your family

We are working with trusted partners to introduce new technologies that enhance your care experience. These partners support the Trust in delivering improved services and managing data securely and responsibly. All data sharing is governed by formal protocols to ensure it is appropriate, relevant, and used only for the purposes outlined above.

Some information may be used for statistical analysis, research, or audit purposes. In these cases, we apply strict safeguards to protect your identity, including anonymisation and pseudonymisation techniques where appropriate.

All organisations and individuals who receive information from us are legally required to keep it confidential and secure.

Who and where do we obtain your information from?

Our team supports the delivery of care by working with information that has already been collected by healthcare professionals and services directly involved in your treatment. We do not collect information from you directly.

We access and use data that has been provided through the following sources:

Healthcare Services - Information about you is collected by clinical teams when you register with a service, attend appointments, or receive treatment. This includes data recorded by:

- Your GP
- Hospitals and other NHS providers
- Community and mental health services
- Social care teams

This information is then made available to us through secure NHS systems to support care coordination, service planning, and digital innovation.

Existing Clinical Systems - We may access data held in national and local clinical systems, such as:

- Summary Care Record
- GP clinical systems
- Hospital electronic patient records
- Referral management systems

Access is strictly controlled and limited to staf who need the information to support care delivery. All systems are auditable and governed by NHS data protection standards.

We use this data to support service improvement, digital transformation, and the development of technologies that enhance patient care. All data is handled in accordance with strict governance protocols to ensure it is used appropriately, securely, and lawfully.

What rights do I have in relation to my information?

You have rights about how your information is used. These include:

- **Right to see your records** – You can ask for a copy of the information we hold about you.

- **Right to correct information** – If something is wrong or incomplete, you can ask us to fix it.
- **Right to delete information** – Sometimes called the 'right to be forgotten'. This doesn't usually apply to healthcare records, but if it does, we will let you know.
- **Right to limit use of your information** – In certain situations, you can ask us to stop using your information while we check accuracy or other concerns.
- **Right to data transfer** – You can ask for your information in a format to move to another service, but this only applies in some cases.
- **Right to object** – You can ask us to stop using your information for certain purposes (e.g., marketing). This usually doesn't apply to healthcare where we are using your data to provide treatment.

To make an application for any of these rights, all rights should be considered within 30 days from date of receipt but may be extended if complex.

Email: rwh-tr.healthrecordsaccess@nhs.net

National Data Opt Out: How we use your information for purposes in addition to your individual care

As part of the wider health and care system, The Royal Wolverhampton NHS Trust works with partner organisations to improve care for patients and the public. While the Digital Innovation Unit does not collect information directly from patients, we support the use of data already recorded by clinical services to enhance care delivery, digital innovation, and service planning.

Whenever you access a health or care service—such as visiting Accident & Emergency, attending a hospital appointment, or receiving community care—important information about you is recorded in a patient record. This helps ensure you receive safe, efective, and personalised care.

In addition to supporting your individual care, information collected by health and care services may also be used for wider purposes, including:

Improving the quality and safety of care

Supporting research into new treatments and technologies

Preventing illness and disease

Monitoring service performance

Planning and commissioning services

These uses are only permitted where there is a clear legal basis, and where appropriate safeguards are in place to protect your privacy. Most of the time, anonymised data is used for research and planning, meaning you cannot be identified, and your confidential patient information is not required.

You have the right to choose whether your confidential patient information is used for purposes beyond your individual care. If you are happy for your data to be used in this way, you do not

need to take any action. If you choose to opt out, your confidential information will still be used to support your direct care, but not for research or planning.

This is known as the **National Data Opt-Out**.

To learn more or to set your preferences, please visit Your NHS Data Matters, please visit Your NHS Data Matters. where you can:

- Understand what is meant by confidential patient information
- See examples of how data is used for care and for wider purposes
- Learn about the benefits of data sharing
- Find out how your data is protected
- Access the system to view, set, or change your opt-out setting
- Find contact details if you prefer to opt out by phone
- See where the opt-out does not apply (e.g. in certain public health emergencies)

You can change your choice at any time.

Please note: Your data will never be shared with insurance companies or used for marketing purposes without your explicit consent.

All health and care organisations are required to comply with the National Data Opt-Out. The Royal Wolverhampton NHS Trust is currently compliant with this policy.

How do I request a copy of my information

You have a right to see or have copies of any information held by the Trust that relates to you free of charge. We have the right to charge an administration fee in situations where repeated requests are received for the same information or the request is excessive. You will be required to prove your identity when making requests.

Subject Access Requests under GDPR rules (post 25 May 18) will be processed within 30 days. However, once our teams have established the volume of records requested there may be a requirement to extended this up to a further 2 months. We will contact you within 30 days should this be the case.

To request access to health records please complete a Subject Access Request form, link provided below, and forward on to:

Health Records Access Team
Health Records Library
Location B19
New Cross Hospital
Wednesfield Road
Wolverhampton
WV10 0QP

Email: rwh-tr.healthrecordsaccess@nhs.net
Telephone: 01902 307999 Extension 85544/85545/88093

Subject Access Request form (PDF, 171Kb)
Subject Access Request form (Word) (Word, 54Kb)

The Health Records Access Team also deal with the Health Records of deceased persons. Access to the health records of a deceased person is governed by the Access to Health Records Act (1990). Under this legislation when a patient has died, only their personal representative, executor or administrator of their will, or anyone having a claim resulting from the death (this could be a relative or another person), has the right to apply for access to the deceased's health records.

Access to Health Records Request form (PDF, 111Kb)
Access to Health Records Request form (Word, 53Kb)

How long is my information kept for?

We follow NHS rules for keeping records safely:

- **Adult hospital records** – 8 years after last treatment or death
- **Children's records** – Until age 25 (or 26 if treated at age 17)
- **GP records (living patients)** – Kept while you remain registered or have contact within 10 years
- **GP records (deceased patients)** – Kept for 10 years after death

After these times, records are securely destroyed or archived.

How to raise a concern or complaint

If you have a question or concern about your care or a compliant, speak to the health professional caring for you, if this is not resolved to your satisfaction you can contact the **Patient Advice and Liaison Service (PALS):**
Email: rwh-tr.pals@nhs.net
Telephone: 01902 695368, 01902 695362 or 07880 601085 (lines open between 10am and 3pm).

If you have any concerns about how your information is being processed or any of the rights as detailed above, please contact the Trust in the first instance through:
Health Records Access Team
Health Records Library
Location B19
New Cross Hospital
Wolverhampton Road
Wolverhampton
WV10 0QP
Email: rwh-tr.healthrecordsaccess@nhs.net
Telephone: 01902 307999 Extension 85544/85545/88093

Data Protection Officer (DPO)
Email: rwh-tr.IG-Enquiries@nhs.net
Address: New Cross Hospital, Wolverhampton Road, Heath Town, Wolverhampton WV10 0QP

The Data Protection Oficer is a point of contact for advice and guidance in relation to your rights. The DPO is responsible for monitoring the Trusts compliance with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2016 as any policies the Trust has in relation to the protection of personal data. The DPO shall perform their duties in an independent manner with due regard to the risk associated with processing operations, considering the nature, scope, context and purposes of processing.

You also have a right to complain directly to the Information Commissioner's Office if you feel the Trust has not responded effectively to any of the above.

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone: 0303 123 1113

Website: Information Commissioner's Office