

## Fair Processing Notice – Membership Database

### Privacy Notice – Membership Records

During the course of its Membership activities, Mid Cheshire Hospitals Foundation Trust collects, stores and processes personal information on current and former Foundation Trust Members. Mid Cheshire Hospitals Foundation Trust is the Data Controller for this information and is registered with the Information Commissioners Office. Our registration number is: Z4846564.

This Privacy Notice includes staff (and former staff), members of the public and volunteers. The only public members included on the database are those that have specifically given consent to become a Member.

We recognise the need to treat personal and sensitive data in a fair and lawful manner. No personal information held by us will be processed unless the requirements for fair and lawful processing can be met.

**What types of personal data do we handle?** In order to carry out our activities and obligations as an employer we handle data in relation to:

- Personal demographics (including gender, race, ethnicity, sexual orientation, religion)
- Contact details such as names, addresses, email addresses and telephone numbers
- Records of engagement and contact as Members of the Trust (including responses to Membership emails and the acceptance of event invitations)

Our staff are trained to handle your information correctly and protect your confidentiality and privacy. We aim to maintain high standards, adopt best practice for our record keeping and regularly check and report on how we are doing. Your information is never collected or sold for direct marketing purposes.

### What is the purpose of processing data?

- Membership administration and management
- Membership engagement planning

**What is our legal basis for using your information?** Public Members apply and provide us with their explicit consent to become a member of the Trust.

Staff are automatically enrolled as members upon commencement of employment and are advised of how to opt-out should they so wish as part of the Trusts recruitment process this is because as a Foundation Trust we are required to establish a membership base from whom governors can be elected under the NHS Act 2006, the processing of staff information is therefore necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

You can change your mind at any time, if you wish to become a member or wish to remove yourself from membership please contact the membership office Membership Office (01270) 612365 [foundation.trust@mcht.nhs.uk](mailto:foundation.trust@mcht.nhs.uk)

**Sharing your information.** There are a number of reasons why we share information. This can be due to:

- Our obligations to comply with legislation
- Our duty to comply any Court Orders which may be imposed

Any disclosures of personal data are always made on case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

**Prevention and Detection of Crime and Fraud.** We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds. We will not routinely disclose any information about you without your express permission. However, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

**Use of Third Party Company.** The Membership database is hosted and maintained by Membership Engagement Services Ltd (MES), 33 Clarendon Road, London, N8 0NW. MES is a wholly owned subsidiary of The ERS Group ([www.theERSgroup.com](http://www.theERSgroup.com)). MES is a 'Data Processor' registered with the ICO working on behalf of clients, the 'Data Controllers'. The Data Protection Officer is Ian Robinson, 33 Clarendon Road, London, N8 0NW, [DPO@theersgroup.com](mailto:DPO@theersgroup.com)

**Information Gathered via the MES website.** The purpose of the MES website, which links to the Mid Cheshire Hospitals NHS Foundation Trust website, is to gather the personal data required in order to sign up Members of the Trust on our behalf. These details may then be used by us to communicate with you about general membership matters. We also collect demographic data based on your postcode to enable us to report the makeup of its membership to NHS Improvement, the Regulator (<https://improvement.nhs.uk>).

Information in this site is gathered in two ways: indirectly (for example, through MES website technology); and directly, (for example through information that you enter). MES may use Cookies, which are small text files stored on your computer or device when you visit a website, which allow the website to work properly and help keep it secure, and help us understand how people are using the website so that we can improve it. For more information about the use of your data please contact the Membership Office using the details below to receive a full Privacy Statement from MES.

**Information Retention.** We will only keep information for as long as it is needed for the purposes described when it was collected. The information will not be kept for longer than legislation permits. You may also request that your information is removed, by emailing [DPO@theERSgroup.com](mailto:DPO@theERSgroup.com) or through the Membership Office of the Trust. When you no longer want to be contacted by us we will suppress your information and delete it after ten years.

**Security.** We want your information to be secure and are committed to maintaining your privacy when doing so. MES and ERS have physical security in their facilities to protect against the loss, theft, misuse, or alteration of information. There are also different layers of security implemented throughout our website platform, for example hardware and application firewalls; intrusion detection systems; and SSL encryption. In addition both organisations are accredited to the Cyber Essentials scheme (<https://apmg-certified.com/PublicOrgLogin/Certificate.aspx>).

**All Sites.** MES may also analyse information gathered to determine what is most effective about their website, to help identify ways to improve it. If data is used for any other purposes, we will describe these to you at the point we collect the information. Neither MES nor ERS pass the data on to any other third party unless requested to do so by the Trust.

**Individuals Rights.** Data Protection laws give individuals rights in respect of the personal information that we hold about you. These are:

1. To be informed why, where and how we use your information.
2. To ask for access to your information.
3. To ask for your information to be corrected if it is inaccurate or incomplete.
4. To ask for your information to be deleted or removed where there is no need for us to continue processing it.
5. To ask us to restrict the use of your information.
6. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.
7. To object to how your information is used.
8. To challenge any decisions made without human intervention (automated decision making)

Should you have any further queries on the uses of your information or wish to lodge a complaint about the use of your information, please contact either the Membership Office or the Trust's Data Protection Officer using the contact details below. If you are still unhappy with the outcome of your enquiry you can write to: The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF - Telephone: 01625 545700.

## Contact Details

Membership Office (01270) 612365 [foundation.trust@mcht.nhs.uk](mailto:foundation.trust@mcht.nhs.uk)

Data Protection Officer Mrs Cora Suckley (01270) 273812

Membership Office (01270 612365) [foundation.trust@mcht.nhs.uk](mailto:foundation.trust@mcht.nhs.uk)