**Patient Relations Privacy Notice**

**2025/26**

**Who we are**

The Royal Wolverhampton NHS Trust collects and processes personal data as part of handling complaints. This notice explains how we collect, use, and protect your personal information when you submit a complaint.

**What information we collect**

We may collect:

* Your name and contact details (e.g., address, email, phone number).
* Details of your complaint.
* Supporting documents and correspondence.
* Any information necessary to investigate and resolve your complaint.

**Why we collect your information**

We collect and use your data to:

* Receive, assess, investigate, and respond to your complaint.
* Fulfil our legal, regulatory and statutory obligations.
* Monitor complaint trends to improve our services.

**Legal basis for processing**

We process your data based on:

* Compliance with legal obligations – The Local Authority Social Services and National Health Service Complaints Regulations 2009
* GDPR Article 6 (1) (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
* GDPR Article 9 (2) (h) as the complaints will often involve processing special category data (health information) for the management of health and social care systems and services.

**Who we share your data with**

We may share your data with:

* Relevant internal departments handling your complaint.
* Regulators, ombudsman services, or legal advisors where required.
* Other healthcare providers involved in your complaint (with consent).
* Those referred to in the complaint including individual members of staff and their line manager.
* Staff involved will be contacted to obtain their comments/a statement. As part of this process, a copy of the complaint will be shared with the staff involved.
* If they don’t wish for the information to be shared, we will inform you that this may limit the investigation and response.
* The patient’s representative where the patient is unable to act for themselves.

We do not sell your personal data.

**How long we keep your information**

We will retain your data only as long as necessary to handle your complaint and meet our legal obligations, usually for 8 years after your complaint is closed.

**What Rights do I have in relation to my information?**

Below is a list of the rights you have in relation to your data and when they apply. To make an application for any of the below rights please contact the Health Records Access Team rwh-tr.healthrecordsaccess@nhs.net in the first instance. All rights should be considered within 30 calendar days from date of receipt but may be extended if complex.

**The Right of Access**

You have the right to request a copy of any information held by the Trust as well as any supplementary information.

**Right to Rectification**

If you believe your information may be inaccurate or incomplete you can make a request to have your information reviewed.

**The Right to Erasure**.

The right to erasure is also known as the ‘right to be forgotten’ introduces a right for you to have personal data erased. Generally, this right is not available with health care data. Where this right is available for specific processing you will be notified.

**The Right to Restrict Processing**

The right to restriction allows you to request the restriction or suppression your personal data. This right is closely linked with the right to rectify and the right to object and will only apply if:

* you contest the accuracy of your personal data and the accuracy is being verified by the trust;
* the data has been unlawfully processed (ie in breach of the lawfulness requirement of the first principle of the GDPR) and you oppose erasure and requests restriction instead;
* the personal data is no longer needed but we need to keep it in order to establish, exercise or defend a legal claim.

**The Right to Data Portability**

The right to data portability allows you to obtain and reuse your personal data across different services. The process should allow for moving, copying or transfer of personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The right to data portability is not an absolute right and generally will not apply to your health care record unless:

* The processing is based on your consent or in the performance of a contract;
* When processing is carried out by automated means

**The Right to Object**

The right to object to processing means that data should cease to be processed. This right applies only where data is obtained with your consent. In most cases we rely on our legal basis to process your data and not consent and therefore for care purposes this right may not apply. If your data is used for any other reason this right may apply, but would have to be assessed on an individual basis.

**Use of profiling**

Profiling is automated processing of personal data to evaluate certain things about an individual. The Trust may use profiling techniques for health care planning purposes. An example of this type of processing is the process of risk stratification of patients based on frequency of attendance.

**Contact us**

If you have any questions about your data in the first instance please contact the [Patient Advice and Liaison Service (PALS)](https://royalwolverhampton.nhs.uk/patients-and-visitors/patient-experience-team/) via email:rwh-tr.pals@nhs.net

How to make a complaint:

**Data Protection Officer (DPO): Raz Edwards**
Email: rwh-tr.IG-Enquiries@nhs.net
Address: New Cross Hospital,

Wolverhampton Road,

Heath Town,

Wolverhampton

WV10 0QP

The Data Protection Officer 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, taking into account the nature, scope, context and purposes of processing.

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

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 Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Telephone: 0303 123 1113
Website: [Information Commissioner’s Office](https://ico.org.uk/)