

SNBTS Data Protection Notice.



Who are SNBTS?

The Scottish National Blood Transfusion Service (SNBTS) is the specialist provider of blood, tissues and cell products and services in Scotland. We are part of NHS National Services Scotland (NHS NSS) which is a public organisation created in Scotland under Section 10 of the National Health Service (Scotland) Act 1978.

This leaflet is our Data Protection Notice. It is a guide to tell you more about the way we collect, store and use personal information about you following your registration as a donor with us. It also tells you what your rights are under data protection law, how you can request to see your information and what to do if you have any concerns about our management of personal information.

Legal basis for our use of your data

We collect blood donations from donors in Scotland and use these to make blood components for patients. To support this, we need to collect, use and store donor personal information. Our legal basis for this is that the use of this information is necessary for:

- the performance of a task carried out in the public interest, or in the exercise of official authority vested in us

- the provision of health or social care or treatment or the management of health or social care systems and services.

On some occasions we may rely on another legal basis, which will usually be that the use is necessary:

- for reasons of public interest in the area of public health; or
- for reasons of substantial public interest for aims that are proportionate and respect people's rights, for example research; or
- in order to protect the vital interests of an individual.

Once a donor is registered on our system, their information is retained so that we can meet the statutory requirements covering the blood donation process. Please ask if you would like to discuss this before you register.



We are committed to maintaining the security and confidentiality of your data.

What personal information do we keep?

- Personal details and contact information: Name, address, date of birth, telephone number, email address, ethnicity, occupation, donor ID number
- Attendance details: Where you normally donate (your 'panel'), your appointments and where and when you attended
- Information affecting eligibility to donate: This can include sensitive information relating to health, sexual relationships, travel and other factors affecting donor or patient safety

- Donation details: This includes your blood group and the results of all the other tests we perform on your donations
- Correspondence: Details of letters and other communications we have sent or received in relation to you
- Other medical records: For example, follow up of any problems you report to us after a donation.

How is personal information stored?

Information about you is stored securely on our electronic donor database. We also keep a copy of the Donor Health Check form which you complete every time you attend to give blood.

Where we need to keep other information (for example, medical records relating to a donor), this is held confidentially in either paper or electronic form.

We are committed to maintaining the security and confidentiality of your data and take care to keep all our security measures up-to-date. We also use encryption software, to make sure your information is stored as safely as possible. All our staff and anyone who receives information from us have a legal duty to keep information about you confidential.

What data sources do we use?

Almost all the personal information we receive is provided by the donor themselves, either through our online forms (including our registration form), calls to our donor enquiry line, or attendance at a blood donor session. Donors are asked to complete a Donor Health Check form each time they attend a session. A sample form can be viewed at www.scotblood.co.uk/giving-blood/publications.

We occasionally receive information from other parts of the health service, including GPs and hospital clinics.

What do we do with your information?

We use your information:

- To ensure your safety and the safety of any patients who receive your donations
- To get in touch with you, so we can let you know when and where to donate
- To let you know about any problems with your donation
- To improve our service; for example, by finding better ways to organise our donation sessions
- For clinical audit and other checks, to make sure we are working to the highest standards
- For market research purposes, to help us recruit and retain donors.

If we don't need your personal details for any of these tasks, we will remove as much information as possible before processing.

SNBTS will not share your data with a third party for any purpose other than those listed, without requesting your consent.

Data sharing

SNBTS will only share your data as allowed or required by law. In some circumstances we may need to release your personal details to a third party supplier, for example, to enable printing of donor cards and Donor Health Check forms. All such suppliers will meet the same confidentiality standards as SNBTS.

If we have identified a problem with your donation that is important for your health, we may refer you to an appropriate health care provider, such as your GP. We will always try to speak to you and ask your permission to do this. However, if we are unable to contact you,

we may pass information on without this consent. We will only do this where we feel it is in your best interest to do so.

If you have previously given blood to another UK transfusion service and we have detected a blood-borne infection in your blood, we may also need to contact that service. This is in case there is any risk to recipients of your donations to that service. We will always make an effort to discuss this with you beforehand. All UK transfusion services are required to follow UK data protection law and have processes in place to ensure the confidentiality of any information that is passed on to them.

SNBTS will not share your data with a third party for any purpose other than those listed above, without first requesting your consent.

How long do we keep personal information?

We keep personal information as set out in the Scottish Government Records Management: NHS Code of Practice (Scotland) Version 2.1 January 2012. The NHS Code of Practice sets out minimum retention periods for information, including personal information, held in different types of records including personal health

records and administrative records. Under the terms of the UK Blood Safety and Quality Regulations, we have to retain records relating to blood donation for at least 30 years.

If we have identified a problem with your donation that is important for your health, we may refer you to an appropriate health care provider, such as your GP.



Your rights

Data protection law gives you, the donor, several rights, including the following:

The right to be informed

You have a right to be informed about how we use personal information. We do this in a number of ways including:

- This Data Protection Notice
- Information leaflets
- Discussions with staff providing your care
- Information on our website www.scotblood.co.uk

The right of access


You have a right to see, or have a copy of, the information we hold about you. This right includes making you aware of what information we hold along with the opportunity to satisfy you that we are using your information fairly and legally. You have the right to obtain:

- Confirmation that your personal information is being held or used by us
- Access to your personal information
- Additional information about how we use your personal information

Although we must provide this information free of charge, if your request is considered unfounded or excessive, or if you request the same information more than once, we may charge a reasonable fee.

If you would like to access your personal information, you can do this by getting in touch with the NHS NSS Data Protection Officer, at the address provided at the end of this leaflet. Please provide as much information as possible about what personal information you wish to see. Include your full name, date of birth, address and donor registration number (if available) to help us locate your records. You should also let us know if your request applies to a specific time period.

Once we have received your request and you have provided us with enough information for us to locate your personal information, we will respond to your request without delay, within one month (30 days). However, if your request is complex we may take longer, by up to two months, to respond. If this is the case we will tell you and explain the reason for the delay.



You have a right to see, or have a copy of the information we hold about you.

The right to rectification

If the personal information we hold about you is inaccurate or incomplete you have the right to have this corrected.

If it is agreed that your personal information is inaccurate or incomplete we will aim to amend your records accordingly, normally within one month, or within two months where the request is complex. However, we will contact you as quickly as possible to explain this further if the need to extend our timescales applies to your request. Unless there is a risk to patient safety, we can restrict access to your records to ensure that the inaccurate or incomplete information is not used until amended.

If for any reason we have shared your information with anyone else, perhaps during a referral to another service for example, we will notify them of the changes required so that they can ensure their records are accurate.

If on consideration of your request we do not consider the personal information to be inaccurate then we will add a comment to your record stating your concerns about the information. If this is the case we will contact you within one month to explain our reasons for this.

If you are unhappy about how we have responded to your request for rectification we will provide you with information on how you can complain to the Information Commissioner's Office, or how to take legal action.



The right to object

You have the right to object to our use of personal information about you, and also seek that further processing of personal information about you is restricted. If we can demonstrate compelling legitimate grounds for processing your personal information (for instance, patient or donor safety or for evidence to support legal claims), your right will not be upheld. If you would like to object to, or request restriction of, our use of personal information about you, you can do this by getting in touch with the NHS NSS Data Protection Officer at the address given at the end of this leaflet.

Other rights

There are other rights under current data protection law, however these rights only apply in certain circumstances. If you wish further information on these rights please look at the data protection pages on the NHS NSS website at www.nss.nhs.scot/publications/nss-data-protection-notice-other-rights/



How you can help

Please check that any information in correspondence you receive from us is accurate and up-to-date. This is especially important for contact details (ie, address, telephone numbers, email address). If any of your details are incorrect, please let us know next time you attend a session. Alternatively you can call us 9am-5pm, Monday to Friday, on **0345 90 90 999**, or by using our online enquiry form at www.scotblood.co.uk

If you are a regular donor, your Donor Health Check form will be posted to your home address before your next session. Please remember to keep this form safe as it contains your personal information. If you are unable to attend one of our sessions, make sure you dispose of it so that your information cannot be read by anyone else.

Don't forget to update us about any change of name, address or phone number (including mobile phone numbers).

Further information about data protection

NHS NSS employs a Data Protection Officer to check that we handle personal information in a way that meets data protection law. If you would like more information, or are unhappy with the way in which we use personal information please tell our Data Protection Officer using the contact details below.

NHS National Services Scotland Data Protection Officer

NHS National Services Scotland
Gyle Square
1 South Gyle Crescent
Edinburgh EH12 9EB

Tel: **0131 275 6000**

e-mail: nss.dataprotection@nhs.scot

You also have the right to complain about how we use your personal information to the Information Commissioner's Office (ICO). Details about this are on their website at www.ico.org.uk.

Contact us

t: 0345 90 90 999

e: nss.snbtSENquiry@nhs.scot

w: scotblood.co.uk

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NATL 075 04

Published June 2022