
NDPP Fair Processing Notice

Ingeus UK Limited and our Delivery Partners use your personal and confidential information for a number of purposes. This notice provides a summary of how we use your information. To ensure that we process your personal data fairly and lawfully, this notice will inform you of:

- Who we are
- Why we need your data
- How it will be used
- Who it may be shared with
- Your rights

The law determines how organisations can use personal information. The key laws are: the Data Protection Act 1998 (DPA), the Human Rights Act 1998 (HRA), relevant health service legislation, and the common law duty of confidentiality.

Ingeus and our Delivery Partners recognise the importance of protecting personal and confidential information in all that we do to ensure we meet our legal duties.

Who we are

Ingeus UK Limited is a provider of people-centred services (such as employability programmes, skills training and health-related support) which help people to reach their full potential. We have a network of organisations which we use to help us deliver these services, either to provide support or to deliver services on our behalf- they are called our Delivery Partners. Our key Delivery Partners for the NHS National Diabetes Prevention Programme are Leicester Diabetes Centre, an internationally-renowned NHS applied health research centre, and pharmacies such as LloydsPharmacy who will conduct blood tests on our behalf.

In this notice, the term ‘we’ means Ingeus and our Delivery Partners.

Why we collect and use your information

We only collect and use your information for the lawful purposes of administering the services we are contracted to deliver on behalf of NHS England, Public Health England and Diabetes UK. We endeavour to provide you with the highest quality of service and therefore need to keep information about you, your health, the services and care we have provided and those which we plan to provide to ensure:

- We provide a good basis for any support or advisory services we offer to you
- The support and the service we provide is safe, effective, appropriate and relevant to you
- We work effectively with others providing you with treatment, support, advice or other health related service

Your information may also be used for:

- Performance monitoring and analysis to help us assess the quality and standard of our services
- Conducting investigations in response to a complaint or enquiry
- Accounting and record keeping e.g. keeping accounts related to business activities and financial management
- With your agreement, research and evaluation such as participating in feedback surveys

The types of information we use

The types of information we may collect and keep on record about you includes:

- Personal details such as your name, address, contact details, and NHS number
- Physical and mental health conditions
- Family details e.g. next of kin information
- Information regarding your lifestyle and social circumstances
- Weight and blood glucose readings
- Details of your GP
- If you provide it, socio-demographic information such as your ethnicity and religion

Retaining your information

We will only retain information for as long as contractually and legally necessary. Information is retained according to contractual requirements set by NHS England, Public Health England and Diabetes UK. When your information is no longer required to be retained it will securely and confidentially destroyed.

Sharing your information

We may share information about you with the following partner organisations to support the service we provide and to assist with your care:

- Delivery Partners who we work with to provide the National Diabetes Prevention Programme, such as the pharmacies who administer blood tests on our behalf
- Your GP regarding your ongoing progress on the programme
- The commissioners of the programme
- If you agree, to support organisations who are evaluating the service

With your consent (and in line with strict information sharing protocols), we may also share your information with the following people or services to ensure the appropriate people are involved in your care in line with your wishes, to protect the health of the general public or to check the quality of service we have given you:

- Carers, partner or other family members
- Social Services
- Education Services
- Local Authorities

We may also share your information for statistical purposes- in these instances your information will be anonymised to ensure you cannot be identified.

We **will not** share information that identifies you to any third party, other than those listed above for any reason, unless:

- You ask us to do so
- We ask and you give us specific permission
- We have to do this by law e.g. by request of a court order
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality e.g. to prevent someone from being seriously harmed

Keeping your information safe

We take our duty to protect your personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure we maintain the confidentiality and security of personal data for which we are responsible, whether electronically or on paper.

All our staff are required to undertake annual data protection training and to work according to the Ingeus Health & Care Confidentiality Code of Conduct. Our staff are subject to the Common Law Duty of Confidence and the NHS Confidentiality Code of Conduct which requires us to protect your information, inform you of how your information will be used, and to allow you in most cases to decide if and how your information can be shared.

We have appointed a Senior Information Risk Owner (SIRO) who is accountable for the management of all information assets and any associated risks and incidents and a Caldicott Guardian who is responsible for the management of your information and its confidentiality.

Your rights

You have the right to know what information we hold about you, what we use it for and, if the information is to be shared, who it will be shared with. Your data sharing preferences will be clearly indicated in your record and we will regularly review them with you.

Where you have provided consent for us to share your information with specific individuals, you have the right to withdraw your consent at any time (provided this does not conflict with our legal obligations).

You also have the right to apply for access to the information we hold about you- this is called a Subject Access Request. To make a request:

- Send your request in writing to: The Data Protection Officer, Ingeus UK Ltd, 66 Prescott Street, London, E1 8HG or email DataProtectionOfficer@ingeus.co.uk
- Your request will need to include sufficient information to enable us to correctly identify your records (e.g. full name, address, date of birth, and NHS number if known)
- We will let you know if there is a fee required and whether Ingeus or the organisation that referred us to you will handle your request

You have the right for any inaccurate information we hold to be corrected. Please inform the Ingeus Data Protection Officer via the methods above so your request can be reviewed.

If you require this notice in a different format or you need further information or assistance, please contact the Ingeus Data Protection Officer.