



# Spirit Implement Privacy Notice

## Spirit Implement

Spirit supplies quality products and services to the NHS. The Spirit Implementation Team undertake Diabetes Device Review. This is a systematic process which delivers effective implementation of local guidance at a practice level. The service brings benefits to both the local NHS and to patients

## Key Principles

- All work will aim to improve patient care and NHS efficiency
- Nothing happens within the practice without their consent
- All information is reported as required to the agreed practice and CCG contact.

## What information is being collected for the Diabetes Device Review by Spirit?

### Patient information

- General information: Name, Date of birth, Postcode
- Clinical information: NHS number, Type of diabetes - Type 1 or 2, current device, diabetes medication

Numbers of patients identified and involved at all steps of the service (totals only)**NB: Patient information remains in the practice at all times. No patient identifiable data is removed or held anywhere by Spirit**

### NHS staff information

- Name and job title
- Contact information, telephone number, email address

### How is it collected?

- Directly from the patient's healthcare professional e.g. GP or Practice Nurse
- Directly from the patient
- Directly from the GP Practice computer system

### Why is it being collected?

This information is being collected in order for the Data Controller to fulfil their contract with the specified Clinical Commissioning Group. Without collecting this information, it would not be possible to provide the Diabetes Device Review in a targeted way. It is also for the vital interest of the patients, who will go onto the latest devices for the management of diabetes.

In addition to this, consent is also used/obtained – this would be while attending the clinic for changeover of the meters or through the clinic invitation letter

### **Information is collected for**

The information is collected for us to deliver the Diabetes Review Clinic to swap patients to a new glucose meter.

### **How will it be used?**

- To identify the appropriate patients for the meter change
- To invite the patient into the clinic
- To swap the meter
- Follow progress of the individuals
- To obtain GP authorisation for an invitation to clinic

### **Who will it be shared with?**

- The Patient's GP Practice
- The patient
- Clinic facilitators and administrators

### **Where will the data be stored?**

All information collected is stored electronically in a secure accredited network. Paper documents are kept in a locked cupboard and destroyed one year after the implementation has been completed.

### **Automated decisions**

No automated decision making is used with the data collected.

### **Your rights as a data subject**

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where Spirit is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact [lisa.wakeford@spirit-healthcare.co.uk](mailto:lisa.wakeford@spirit-healthcare.co.uk)

### **The Data Protection Officer (DPO)**

Spirit have appointed a DPO. This is our Head of Governance – Lisa Wakeford. The role of the DPO is to assist data 'Controllers' and 'Processors' to comply with data protection law and avoid the risks that organisations face when processing personal data.

### **The Data Controller**

The Data Controller responsible for keeping your information confidential is:  
Spirit, Spirit House,  
Saffron Way,  
Leicester, LE2 6UP

Telephone: 08008815423

[www.spirit-healthcare.co.uk](http://www.spirit-healthcare.co.uk)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

### **Information Commissioner**

The Data Protection Act 2018 requires organisations to lodge a notification with the Information Commissioner to describe the purposes for which they process personal information. These details are publicly available in the Register of Data Controllers. Our Registration number is: **Z1816219**

Further information can be obtained from:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, SK9 5AF

Telephone: 0303 123 1113

[www.ico.org.uk](http://www.ico.org.uk)