

## Legal Basis for Processing Data – National Diabetes Prevention Programme (NDPP)

Type of Organisation information is shared with	The type of information	What we use your information for	The lawful reason that we have identified to process your information
<b>NHS England</b>	Full data set: names, age, ethnicity, lifestyle, weight, HPA1c, contact information etc. They also receive case studies where Patient consent has been provided.	NHSE provides funding for a programme to encourage participants at risk of contracting Type 2 Diabetes to change lifestyle habits, such as diet and weight loss, to avoid contracting the condition.	<p><b>Art 6(1)(e)</b> - 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.</p> <p><b>Art 9(2)(h)</b> - Processing is necessary for the processing of preventative medicine, medical diagnosis, the provision of health or social care treatment.</p> <p><b>Art 9(2)(i)</b> - Processing is necessary for reason of public interest in the area of public health.</p>
<b>Changing Health</b>	Name, email address and telephone number.	If participants choose not to attend face to face group sessions, participants are offered the opportunity to take part in the programme via a digital mobile phone application or online desktop platform provided by Changing Health.	<p><b>Art 6(1)(a)</b> – the data subject has given consent to the processing of his or her data for one or more specific purpose.</p> <p><b>Art 9(2)(a)</b> – the data subject has given explicit consent to the processing of his or her data for one or more specific purpose.</p>
<b>Commissioning Support Unit (CSU)</b>	Selected personal data in line with the Data Output Specification and Direct Recruitment Data Requirements document.	Authorised Ingeus staff may share selected data with the relevant CSU for the purpose of performance monitoring and evaluation of the contracts and service.	As above

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<b>Clinical Commissioning Groups (CCGs)</b>	No personal data is shared with these organisations. Only referral numbers are shared. Personal information is not identifiable. CCGs may, however, monitor sessions being provided to participants.	NHSE provides funding for a programme to encourage participants at risk of contracting Type 2 Diabetes to change lifestyle habits, such as diet and weight loss, to avoid contracting the condition. Clinical Commissioning Groups are involved in providing health services for residents in their areas.	As above
<b>Diabetes UK (Charity)</b>	No personal data stored, although Diabetes UK occasionally monitor sessions being provided to Patients.	None - during sessions they might hear names but no personal information is provided to them or recorded by them. The observations conducted are for the purpose of performance monitoring and continuous improvement.	<b>Art 6(1)(e)</b> - 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.
<b>Local GPs</b>	Full data set shared: Health information, names, addresses. Read Codes - which are put onto patient files (e.g. code for diabetes).	Ingeus sends GP's an acknowledgement of patients starting the programme and a discharge letter when they leave the programme. Patient identifiable information is also sent via NHS.net accounts if GP's state that there might be missing information or when Intravenous blood tests are required, or to alert the GP to a blood test result that indicates the patient already has Type 2 diabetes.	Sometimes consent might be obtained from individuals in accordance with <b>Art 6(1)(a)</b> and /or <b>Art 9(2)(a)</b> .  Otherwise processing is permitted under <b>Art 6(1)(e)</b> , <b>Art 9(2)(h)</b> and <b>Art 9(2)(i)</b> .
<b>Leicester Diabetes Centre (LDC)</b>	Anonymised data set for the purpose of quality assurance and evaluation.  In order to assess the quality and standard of the NDPP programme	Subcontractors are appointed by Ingeus to deliver core aspects of the NDPP.  LDC provides curriculum support to Ingeus and assures quality of the programme.	As for NHSE  <b>Art 6(1)(a)</b> – the data subject has given consent to the processing of his or her data for one or more specific purpose.

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	delivery by our Educators, we may also occasionally obtain video/audio recordings of a small number of core programme sessions that may indirectly include visual and audio information about you. These recordings will be shared with LDC and stored for a limited time.		<b>Art 6(1)(f)</b> – processing is necessary for the purposes of the legitimate interests pursued by the data controller.
<b>NHS Check Providers</b>	Referral data may be received but Ingeus does not send these Patient personal data. They can be different from GPs, and may be separate private providers	NHS checks can establish whether a participant is eligible for the NDPP programme. Providers of NHS checks can make a direct referral to NHSE for a participant to start on the programme.	As for NHSE
<b>Other Referral Organisations</b>	Limited data: Name, contact details, and potentially a description of the problem or incident.	These organisations provide one-off interventions to participants on an ad hoc basis. These are often IAPT services for mental health. In many instances such referrals will go through GPs.	As for NHSE
<b>Insurers</b>	Data required describing the nature of the claim. This may be quite detailed depending on the allegation made / being defended/prosecuted.	It is possible that participants or third parties may bring claims or suffer incidents while participating on the programme. We are required to disclose any such incidents to our insurers.	<b>Art 6(1)(f)</b> - processing is necessary to protect the legitimate interests of the data controller.  <b>Art 9(2)(f)</b> - processing is necessary for the establishment and defence of legal claims.
<b>Other Ingeus entities providing IT or management services (Ingeus Europe Limited)</b>	Full data set is accessible to nominated individuals.	Nominated Ingeus Europe staff will have access to the full Participant data set to provide IT and/or management support. All data is retained in the UK.	As for NHSE

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<b>IT Support and Software companies</b>	Ingeus logs the complete data set with ReferAll, who support the ReferAll system.	In order to deliver the services, patient information needs to be stored and processed on a software system. All data is retained in the EEA.	As for NHSE
<b>Feedback Survey – Membership Engagement Services (MES)</b>	Limited personal information- phone number and email address.	In order to improve our services and ensure we delivery quality services to participants we send out short feedback surveys using software provided by MES.	<b>Art 6(1)(f)</b> - processing is necessary to protect the legitimate interests of the data controller.
<b>Police / Adult Safeguarding - crisis helpline</b>	Limited personal data set provided for the purposes of reporting an incident.	Ingeus is required by law to notify police, GPs or local authorities about any safeguarding concerns.	<b>Art 6(1)(c)</b> - processing is necessary to comply with a legal obligation to which the controller is subject.  <b>Art 9(2)(g)</b> - processing is necessary, on the basis of Member State law to safeguard the fundamental rights and the interests of the data subject.
<b>Family members of participants</b>	Name, details of any incident, information disclosed by participant	Sometimes family members need to be contacted at the request of participant, generally for interpreter skills.	<b>Art 6(1)(a)</b> – the data subject has given consent to the processing of his or her data for one or more specific purpose.