

# Spirit Implement Privacy Notice

## **Spirit Implement**

Spirit Health family of companies supplies quality products and services to the NHS. Spirit Implement Ltd, part of the Spirit Health family of companies, provide medicines optimisation services across the NHS. This is a systematic process which delivers effective implementation of local guidance at a GP 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 if relevant, the local ICB contact.

## **What information is being collected for the Medicines Optimisation Service by Spirit?**

### **Patient information**

- General information: Name, Date of birth, Postcode
- Clinical information including NHS number, condition and current treatments

Numbers of patients identified and involved at all steps of the service (totals only)

### **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 for the Data Controller to fulfil their contract with the specified NHS organisation. Without collecting this information, it would not be possible to provide the Medicines Optimisation Service in a targeted way. It is also for the vital interest of the patients, who will go onto the locally preferred treatment option.

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.

The information is collected for us to make recommendations to the lead GP to make changes to treatment in line with local guidelines.

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

- To identify the appropriate patients for the treatment change
- To inform patients of any changes being made
- To swap the treatment
- Follow progress of the individuals
- To obtain GP authorisation for any treatment change

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

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

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

The initial audit is stored on the practice computer and information transferred to a data collection sheet in pseudonymised form (eg EMIS number and initials), which is also stored on the implementers' laptop (BitLocker encrypted) and emailed to the GP via nhs.net email.

The Data Processor will retain pseudonymised data (incl. EMIS number and initials) through delivery of the service and for a maximum period of three months on completion of the service for the purpose of maintaining an audit trail should any queries arise and require follow up. Following this, at the end of the 3 months period the data will be permanently deleted from Spirit SharePoint. This will be 3 months after completion of the service in the final practice, a confirmation statement will be sent to the ICB Medicines Management and IG team to confirm all data has been permanently deleted.

All service delivery information collected (e.g. anonymised numbers of patients reviewed) is stored electronically in a secure accredited network. Paper documents, where required, 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 Implement,  
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)