

All Wales Diabetes Prevention Programme: Privacy Notice

Your registered practice is participating in the All Wales Diabetes Prevention Programme (AWDPP). The AWDPP is for adults who have recently had a blood test (known as HbA1c) which shows a high risk of type 2 diabetes. If your result shows a high risk of type 2 diabetes, your practice will write to you and invite you to attend a 30-minute consultation which will provide you with important information to help reduce your risk of type 2 diabetes. The consultation is provided by a health care support worker who works for your local health board and is supported by the local health board dietetics team. Your practice and local health board have developed a Joint Data Controller agreement which mean both must agree to a key set of principles which are in place to protect you and your data. The AWDPP is committed to ensuring that your privacy is protected. Any personal or special category data you have provided or will provide through your participation in the AWDPP will only be used in accordance with this privacy notice.

What information do we collect about you

To help decide if you should attend an AWDPP consultation, your practice will work with your local health board and process information, some of which is considered personal and special category data, and includes:

- Your age
- Your recent HbA1c blood test result

If you are over 18 and your HbA1c blood test result suggests you are at risk of type 2 diabetes, your practice may offer you an AWDPP consultation. However, your practice and health board will also consider other parts of your health which means the AWDPP is not suitable for you. These include:

- History of diabetes
- Body mass index under 20
- Metformin prescription or other medications you are taking which lower blood sugar
- Receiving end of life care
- Pregnancy
- If you are artificially fed

If an AWDPP consultation is suitable for you, your practice will provide your local health board with some of your personal data in order to invite you to a consultation which includes your:

- Name
- Address
- Telephone number

When you attend an AWDPP consultation, the healthcare support worker will collect some data from you including your height and weight and information about your current quality of life. They will also record if you have agreed to be referred to other health board led support services which are part of the AWDPP. Data will only be processed as part of the AWDPP when necessary, with the aim of reducing your risk of type 2 diabetes. All data collected as part of your consultation will be recorded and held securely within your patient record.

How we get your personal information and why we have it

The personal information we process as part of the AWDPP which helps to identify and invite you to a consultation is provided to us (your registered GP practice) for one of the following reasons:

- You provided it as part of your patient registration with the practice
- You provided it as part of other health appointments you have attended in which data has been recorded into your patient record which the practice is responsible for, such as your blood test result

We use the information that you have given us in order to:

- Help reduce your risk of developing type 2 diabetes by providing you with the best possible care and support
- To check the AWDPP is safe, good quality and fair

We will share this information with:

- Your local health board as they are responsible for providing the AWDPP consultations and any health board led support services you may be offered
- Your data will also be shared with the SAIL data bank although will be completely anonymous and will not identify you in any way. SAIL uses anonymised data so that it can be used for research studies and to help make services better, without compromising your individual privacy. To opt out of SAIL using your anonymised data, you can make an enquiry to your GP practice to discuss your options and set your opt out preferences
- The data the AWDPP collects will be used by research teams to examine how effective the AWDPP is as a service at reducing the risk of type 2 diabetes, although you won't be identified personally

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Personal Data: Establishment Order Article 6(1)(e)
- Special Category Data: Medical Purposes Article 9(2)(h)

We process your personal data to directly carry out our statutory functions. This means that because we are established by Act of Parliament and are required by law to carry out these functions, under Data Protection law we are allowed to process your personal data because the processing is 'necessary for performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

How we store your personal information

Both your registered primary care practice and local health board comply with the following measures as part of the AWDPP:

- Information is stored within secure primary care IT systems and kept in accordance with NHS Wales Records Management Code of Practice 2021
- Have in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed in an unauthorised way
- Have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so
- Limit access to your personal data to only those who have a business/healthcare need to know and they will only process your personal data subject to a duty of confidentiality
- All users accessing our systems will use a secure username and password to access the system, and all activity performed is fully audited
- If any of your information needs to be communicated by email, this is done so using secure NHS Wales email addresses where all information is protected via secure web communication channels.
- Any data collected as part of your AWDPP consultation is recorded directly into your patient record and kept by your practice for as long as you remain registered. If you move to a new practice, your patient record transfers with you and your data remains in your record
- Any other personal data collected outside of your patient record, for example personal data used by your health board to help arrange your AWDPP consultation, will be kept for no longer than is necessary to ensure you have received your AWDPP consultation and any subsequent follow up appointments. After which, it will be deleted using commonly used secure IT procedures

Your data protection rights

You have the right to receive information about the personal data we hold as part of the AWDPP by making a 'subject access request' under the UK General Data Protection Regulation (UK GDPR) to your registered practice and/or local health board. The UK GDPR includes a number of rights for individuals. We must generally respond to requests in relation to your rights within one month, although there are some exceptions to this. The availability of some of these rights depends on the legal basis that applies in relation to the processing of your personal data. For this Service, the following rights are listed and how they apply are described below.

Your right to be informed - Your right to be informed is met by the provision of this privacy notice, and similar information when we communicate with you directly – at the point of contact.

Your right of access - You have the right to ask us for copies of your personal information to see what information is held about you

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. However, given the legal bases relied on for this Service the right is not absolute, and we cannot delete data that is factually correct and in accordance with the Public Records Act 1958.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances. You can ask us to do this for example where you contest the accuracy of the data.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds, unless your objection relates to marketing.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to complain to the Information Commissioner

You have the right to complain to the Information Commissioner's Office (ICO) if you are not happy with any aspect of processing of personal data for the AWDPP or believe that we are not meeting our responsibilities as a data controller. The contact details for the Information Commissioner are:

Information Commissioner's Office
Wycliffe House
Water Lane,
Wilmslow SK9 5AF

Website: www.ico.org.uk

Tel: 0303 123 1113

Contact Information

If you have any questions or concerns relating to the content of this AWDPP privacy notice or wish to action your data protection rights, please make contact using the following details:

Practice Name: The Vale Of Neath Practice

Practice Address: Vale Of Neath Medical Centre, Glynneath Road,
Glynneath, Neath, SA11 5AT.

Practice Phone Number: 01639 509050

Practice Email Address: alex.davies2@wales.nhs.uk

Link to Practice's generic data privacy statement:

<https://www.valeofneathgps.org/website/W98046/files/The%20Vale%20Of%20Neath%20Practice%20Privacy%20Policy%202022.pdf>

Health Board Name: Swansea Bay University Health Board

Health Board Nutrition and Dietetic Service Address:

Neath Port Talbot Hospital

Baglan Way

Port Talbot

SA12 7BX

Health Board Nutrition and Dietetics Service Phone Number: 01639 862392

Contact Details of our Data Protection Officer

We are required to appoint a data protection officer (DPO). This is an essential role in facilitating our accountability and compliance with UK Data Protection Law.

Our Data Protection Officer is:

Digital Health and Care Wales (DHCW)

Information Governance, Data Protection Officer Support Service

4th Floor, Tŷ Glan-yr-Afon

21 Cowbridge Road East

Cardiff

CF11 9AD

Email : DHCWGMPDPO@wales.nhs.uk