

Privacy Policy

Community Health Partnerships Limited is a company wholly owned by the Department of Health and Social Care and is the public-sector shareholder in 49 NHS Local Improvement Finance Trusts (LIFT), a form of public-private partnership. We provide debt funding for health infrastructure via the LIFT programme and in future the Regional Health Infrastructure Company (RHIC) Programme, which is currently subject to government approval.

We are also head tenant in 307 LIFT buildings and provide a range of property management services to ensure efficient use and smooth operation of these specialist healthcare facilities.

This privacy policy explains how we use any personal information we collect about you when you have any dealings with us as a:

- tenant;
- customer in receipt of partnering services (you could be a clinical commissioner, general practitioner, hospital trust, community service provider, mental health provider and/or local authority);
- user of our healthcare buildings (you could be a patient, member of staff or visitor);
- request to film or take photos within our buildings;
- make any sort of enquiry; or
- when you use this website.

If you are a job applicant or member of staff then please refer to CHP's Employee Privacy Notice.

What information do we collect?

We collect information that enables us to deliver high quality, complaint services to our customers, partners and shareholders.

The types of personal information we collect include:

- personal details such as names, organisational name, job title, work address, work e-mail address and phone number, information about the services you provide and relevant points of contact, information about your tenancy, and information about any affiliation between your services and any other service.
- employment details, for example for those that work for us either directly or are commissioned by us to provide a service
- financial details, where we provide payment for services
- visual images, for example photography and filming of individuals for promotional purposes, and in these instances, we will always obtain your explicit consent.

We also collect sensitive classes of information if you are a prospective or current employee, details of which can be found within CHP's Employee Privacy Notice.

We collect this information in two ways:

- **Information you give us.** You may give us information by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you agree to provide a service to the company, sign a tenancy agreement/commence a tenancy and/or send an enquiry using the contact us details found on our website. For suppliers this data extends to the provision of bank details to enable the processing of payments. It also includes information given when you contact us via our customer services, contact us or refer to us via social media channels, Twitter and LinkedIn.
- **Information we receive from other sources which has been appropriately shared with us.** We may also receive information from the following sources:
 - Third parties with whom we work closely (including, for example, business partners, sub-contractors, analytics providers, search information providers, credit reference agencies).
 - Government and NHS bodies (including for example NHS England, NHS Improvement, Clinical Commissioning Groups, and Local Improvement Finance Trust companies, and the Department of Health and Social Care).
 - Publicly available information, including that which can be discovered by visits to your rental property, and on the Internet.

Website usage information is collected using cookies.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can instruct your browser not to accept cookies - the above websites provide guidance on how to do this. Disabling cookies however, may affect the functionality of some website features.

Other websites

This privacy policy applies exclusively to the website of Community Health Partnerships Ltd. As it contains links to other websites, care should be taken to acknowledge the privacy notices of other third-party sites.

Why do we collect this information?

We use this information in the following ways:

- to carry out our obligations from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about your tenancy, and services offered in respect of it;
- anonymously for the creation of analytical reports about services in your local area and nationwide;
- to inform Local Improvement Finance Trust companies about your tenancy and its terms, to allow them to ensure their own obligations to shareholders and lenders can be discharged;
- to allow us to handle payments for your tenancy effectively;
- to enable us to manage your tenancy, including to organise repairs and maintenance of your property;
- to enable sub-contractors, including but not limited to NHS Property Services, to perform facilities management services;
- to notify you about changes to our service;
- to keep you informed of operational management of your LIFT building including any issues;
- to respond to ad hoc queries from the Department of Health and Social Care.

Sharing your information

There are a number of reasons why we share information. This can be due to:

- Our obligations to comply with current legislation
- Our duty to comply with a Court Order
- You have consented to disclosure

We may pass on your personal information if we have a legal obligation to do so, or if we have to enforce or apply our [terms of use](#) and other agreements. This includes exchanging information with other government departments for legal reasons.

We won't share your information with any other organisations for marketing, market research or commercial purposes, and we don't pass on your details to other websites.

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may also share your information with selected third parties including:

- Suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- NHS services, including NHS Shared Business Services and NHS Property Services to enable effective management of your tenancy;

- Local Improvement Finance Trust companies and the Department of Health to provide information regarding the services provided in your locality; and
- NHS England and Clinical Commissioning Groups for billing purposes.
- We may disclose your personal information to third parties:
 - in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - if Community Health Partnerships Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
 - if the Department of Health or another government body restructures the way in which healthcare is managed, in which case personal data held may transfer to another body; and/or
 - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our tenancy agreement and any other agreements; or to protect the rights, property, or safety of Community Health Partnerships Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Retaining information

We will only retain information for as long as necessary. Records are maintained in line with the Community Health Partnerships' retention schedule which determines the length of time records should be kept.

How is your Data Stored and kept secure?

At CHP we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on secure servers and password protection is utilised in all company pcs and information systems. Any paper copies containing personal data will be kept in a locked filing cabinet and shredded/destroyed at the end of the appropriate retention period OR scanned in and immediately shredded/destroyed.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access including regular reviews of our process. We do not transfer your data outside the European Economic Area ("EEA"). If in future we do need to transfer your data outside the EEA, we will only do so if adequate protection measures are in place in compliance with data protection legislation.

Any data you send is at your own risk.

CHP has procedures and security features in place to keep your data secure once we receive it. CHP will not be liable for any information security issues arising during the transfer of data to the company.

The company has a dedicated Data Protection Officer who is accountable for the management of all information assets and any associated risks and incidents.

All staff are required to undertake annual information governance training and are provided with an information governance user handbook that they are required to read, understand and agree to adhere to. The handbook ensures that staff are aware of their information governance responsibilities and follow best practice guidelines ensuring the necessary safeguards and appropriate use of person-identifiable and confidential information.

What are your rights?

You have the right to request:

- Access to personal information held about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for marketing purposes. We will inform you before collecting your data if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.
- That we do not process your personal data for scientific or historical research purposes, where relevant, unless the processing is necessary in the public interest.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- That the data is erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation.
- That the processing of information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing)
- Data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do

so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Keeping your information accurate and up to date

If your information changes for any reason then you should inform us (via the channel through which you first provided your details) of the change as soon as possible so that we can ensure your information is kept accurate and up to date.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on May 2018.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you by:

- email SubjectAccessRequest@communityhealthpartnerships.co.uk or
- write to us at Community Health Partnerships, Manchester One, 53 Portland Street, London, M1 3LD