



## London Procurement Partnership

*Commercial advantage for the NHS by the NHS*



### Privacy Notice

General Data Protection Regulation

## Version Control

Contributor(s)	Date	Version	Comments
Henry Vivian-Neal	April 2018	0.1	Initial draft Intended for deployment on the LPP website and to be referred to in ITTs <i>etc.</i>
Henry Vivian-Neal	April 2018	0.2	Minor updates and edits
Henry Vivian-Neal	May 2018	Final	After review with the Data Governance team at Guy's & St Thomas' NHS Foundation Trust

Review date: May 2018 and annually thereafter

## Contact Details

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## 1. Introduction

This Privacy Notice is issued by NHS London Procurement Partnership ('LPP') under the General Data Protection Regulation ('GDPR').

LPP is:

a Procurement Consortium, owned by its members, who are:

- i. NHS Foundation Trusts;
- ii. NHS Trusts;
- iii. Clinical Commissioning Groups;
- iv. Arms-length government bodies; and
- v. other organisations.<sup>1</sup>

LPP is hosted by Guy's & St Thomas' NHS Foundation Trust and is based at:

200 Great Dover Street  
London SE1 4YB

**Telephone:** 020 7188 6680

**Email:** [lpp.comms@nhs.net](mailto:lpp.comms@nhs.net)

**Web:** <http://www.lpp.nhs.uk/>

LPP is not a legal entity in its own right and, as it is hosted by Guy's & St Thomas' NHS Foundation Trust, it is subject to the Data Governance and other policies of the Trust.

## 2. Personal Data

LPP collects and processes Personal Data:

1. in connection with the framework contracts that it awards on behalf of its members;
2. that is supplied by its members in connection with their membership;
3. that is supplied by individuals who are non-members in connection with agreement to receive communications;
4. that is supplied to LPP by its commercial partners (*e.g.*, suppliers) in connection with their appointment(s) to contracts; and
5. for the purpose of calculating commissions (or activity-based income) due to LPP

in accordance with Article 6 (b) of the GDPR (which establishes that an organisation such as LPP may process Personal Data because such processing is necessary for a contract that LPP has with the individual, or because s/he has asked LPP to take specific steps before entering into a contract).

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<sup>1</sup> An up-to-date list of the members of LPP is set out at <http://lpp.nhs.uk/about-lpp/our-members/>

Other information, such as spend data between members of LPP and suppliers, is held by LPP and may contain Personal Data.

LPP does not capture and store any personal information about website visitors, except where you voluntarily choose to give your personal details via email, through registration or by using an electronic form on our site in which your details are stored on our contact database.

The GDPR obliges LPP to follow security procedures regarding the storage and disclosure of information which has been supplied to LPP in order to avoid unauthorised loss or access. As such, LPP has implemented industry-standard security systems and procedures to protect information from unauthorised disclosure, misuse or destruction.

### 3. How LPP will use information about you

LPP's contact databases are used to send the following information to members:

- Invitations to upcoming LPP events and other events relevant to procurement in the NHS;
- Members' Newsletters which contain updates on agreements as well as relevant LPP and sector activities;
- Updates on agreement, supplier and contract information; and
- Surveys to assess agreements, supplier performance, on-going procurement requirements, member satisfaction and event satisfaction.

Any personal information provided for this purpose will be processed in accordance with the GDPR.

LPP will only hold your Personal Data for as long as is necessary. LPP will not disclose any personal information to any third parties with the exception of passing on your name, job title, institution and work email address to contracted consortia suppliers and speakers at LPP events you have chosen to attend. Please contact LPP if you wish to opt out of this.

### 4. Retention of Personal Data

LPP retains Personal and other Data in accordance with the [NHS Records Management Code of Practice](#),<sup>2</sup> which sets out minimum periods for the retention of records. The current (May 2018) guidance for the retention of tenders and contracts is:

Record Type	Retention Start	Retention period	Action at end of retention period
Contracts sealed or unsealed	End of contract	6 years	Review and if no longer needed destroy
Contracts - financial approval files	End of contract	15 years	Review and if no longer needed destroy

<sup>2</sup> *The Records Management Code of Practice for Health and Social Care* (2016): Information Governance Alliance for the Department of Health.

Record Type	Retention Start	Retention period	Action at end of retention period
Contracts - financial approved suppliers documentation	When supplier finishes work	11 years	Review and if no longer needed destroy
Tenders (successful)	End of contract	6 years	Review and if no longer needed destroy
Tenders (unsuccessful)	Award of tender	6 years	Review and if no longer needed destroy

## 5. Subject Access Requests

You have the right to request a copy of the information that LPP holds about you.

If you would like a copy of Personal Data that LPP holds about you, please submit a Subject Access Request in writing to the address above, providing sufficient information to judge whether the person making the request is the individual to whom the personal data relates.

All requests will be dealt with in line with the guidelines set out by the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

## 6. Disclosures required by law

Personal Data may be disclosed where LPP is obliged by law to do so. LPP may also disclose Personal Data where it is allowed by law in order to protect or enforce its rights or the rights of others and for the detection and prevention of crimes, such as fraud.

## 7. Other websites

The LPP website contains links to other sites. This Privacy Notice applies to LPP only and so if you choose to click through to a website from a link displayed on <http://www.lpp.nhs.uk/> this Privacy Notice will no longer apply.

## 8. Data Controller and Data Protection Officer

The Data Controller and the Data Protection Officer for LPP are its host organisation, Guy's & St Thomas' NHS Foundation Trust:

Data, Technology & Information Directorate  
 First Floor, South Wing  
 St Thomas' Hospital  
 Westminster Bridge Road  
 London SE1 7EH

**Telephone:** 0207 188 7188 ext 54766  
**Email:** askIG@gstt.nhs.uk or  
SubjectAccess@gstt.nhs.uk

## 9. Notes

Capitalised Terms (*e.g.*, 'Personal Data') that are used in this *Privacy Notice* shall have the same definitions as those set out in the General Data Protection Regulation.

[Overview of the General Data Protection Regulation](#)