

## New Dialogue Privacy Statement

On 28 November, New Dialogue became the new home of Healthwatch Kingston upon Thames.

Since its creation, our organisation has been registered as the charitable company 'Healthwatch Kingston upon Thames', established to deliver the Healthwatch statutory service for the Royal Borough of Kingston upon Thames.

Following careful consideration, the Healthwatch Kingston Board agreed to change the charitable company name to 'New Dialogue'.

This change relates solely to our organisation's name. The legal entity remains the same, and there is no change to governance, staff, or the delivery of the Healthwatch Kingston upon Thames statutory service.

### 1. Scope (last updated: 10.02.26)

This policy applies to

Employees	x
Contractors	x
Volunteers	x
Partners	x
Suppliers	x
Consultants	x

Unless otherwise stated, this policy and procedure is non-contractual, does not form part of any contract of employment, and may be adapted or amended at any time by the Board of Trustees.

### Purpose of this statement

The [Data Protection Act 2018](#) states that you shouldn't keep personal data longer than necessary. This means that you must have a lawful basis for keeping information, and once you no longer need it, you should securely erase and destroy it.

New Dialogue delivers the Healthwatch Kingston upon Thames contract (your local Healthwatch statutory service in Kingston). We have a lawful basis to process personal data under Article 6(1)(e) of GDPR; however, we may opt to seek consent for certain areas of Healthwatch work and other New Dialogue contracts.

Healthwatch organisations may process personal information without consent when it is *necessary to perform a task in the public interest* or to carry out their official functions, which are laid down in law. This includes gathering people's views of health and social care services and providing advice.

All of the work we do is rooted in the community, and we take our obligations to ensure the correct processing and use of personal data (in particular, under the [Data Protection Act 2018](#) and the [General Data Protection Regulations](#)) seriously. We value the information people give us – it helps us fulfil our mission to act as the local independent champion for people who use health, social care and other public services.

This Privacy Statement sets out the data processing practices carried out by New Dialogue (delivering Healthwatch Kingston and other projects). We retain and use personal data (information that relates to and identifies living people) in a number of ways, as set out below.

From time to time, we revise our Privacy Statement. The current version will always be published on our website.

### **Registration Information**

The data controller for New Dialogue and the Healthwatch Kingston statutory service is [New Dialogue](#), and our independent Data Protection Officer (DPO) is [Data Protection Education](#).

New Dialogue is registered with the Information Commissioner's Office (Reference number: ZA262945)

Find out more about our purpose and what we do on our websites: [New Dialogue](#) and [Healthwatch Kingston](#)

### **How we use personal data**

New Dialogue (delivering Healthwatch Kingston and other projects) process personal data in a number of ways. The following is non-exhaustive and sets out some key data processing activities:

1. To provide communications that you sign up for, such as our email newsletter and/or social media.
2. To help signpost people who contact New Dialogue and Healthwatch Kingston with enquiries and/or who are seeking support accessing health, social care and other public services.
3. To monitor attendance at community engagement events and workshops.
4. To carry out surveys (online and in paper formats) to understand people's experiences with health, social care and other public services.
5. As part of Healthwatch Kingston Enter and View visits, and visits to other health and social care settings, where we may speak with patients, carers, relatives and members of staff about their experiences.

6. As part of New Dialogue and Healthwatch Kingston research projects that gather service user experiences of health, social care and other public services.
7. Engaging with New Dialogue and Healthwatch Kingston in other ways – for example, via various boards and other forums with which New Dialogue or Healthwatch Kingston is involved.
8. To support the work of Healthwatch England.
9. To support the work of health, social care and other public service stakeholders – for example, RBK, the NHS, the local ICS/ICB, etc.
10. In certain circumstances, we may need to process personal data relating to safeguarding and/or by law – for example, under the FOIA 2000.
11. To recruit and support New Dialogue and Healthwatch Kingston volunteers and trustees.
12. To recruit and employ New Dialogue staff to deliver the Healthwatch Kingston statutory service and other programmes and projects.
13. Other means of obtaining views from people about the health, social care and public services they use.

### **The type of personal information we collect**

We currently collect and process the following information:

1. Personal identifiers, contacts and characteristics (for example, name and contact details).
2. Health conditions, including details of healthcare; ethnicity; sexual orientation and religion.
3. Other demographic data, including age and gender or special category data (like health data) where appropriate.
4. We automatically collect some technical information from devices and web browsers that you use. This might include your IP (Internet Protocol) address.

New Dialogue uses information you share with us in line with our contractual arrangements and Healthwatch Kingston statutory service functions. These are inclusive of, but not limited to:

1. Obtaining people's views about their needs, and their experience of health, social care and other public services. New Dialogue and Healthwatch Kingston make these views known to those involved in the commissioning and scrutiny of public services.
2. Creating reports and making recommendations about how services could or should be improved.

3. Promoting and supporting the involvement of people in the monitoring, commissioning and provision of health, social care and other public services.
4. Providing information and advice about health, social care and other public services, their rights and their options.
5. Making recommendations to Healthwatch England to advise the CQC to carry out special reviews or investigations into areas of concern.

We also collect information about your age, ethnicity, gender and health. Depending on the needs of each project, we may collect information about your religion or belief or your sexual orientation.

We are allowed to collect sensitive information like this because it is connected with the provision of and management of health, social care and other public services.

We collect this data to help us understand who we are speaking to and to understand how different groups experience health, social care and other public services.

A Data Protection Impact Assessment (DPIA), is run at the start of every new type of project to assess the type of personal data or special category data required to fulfil the task.

## **Security**

We are strongly committed to data security, and we take reasonable and appropriate steps to protect your personal information from unauthorised access, loss, misuse, alteration or corruption.

We have put in place physical, electronic, and managerial procedures to safeguard and secure the information you provide to us.

Only authorised employees, volunteer representatives and contractors under strict controls will have access to your personal information.

## **Using our website**

Please note that this statement does not cover links within our websites to other websites.

When you browse through the information on our websites, they do not store or capture your personal information. Your IP address is logged (as it is automatically recognised by any web server), but this is only so you can download our websites onto your devices rather than for any tracking purpose; it is not used in any other way.

## **Retention and disposal of personal data**

We publish a data retention schedule within our [Information Security and Governance Policy and Procedures](#), which explains how long we keep different types of records and documents, including any that contain personal data. Personal data is deleted or securely destroyed at the end of our retention periods.

## **Cookies**

Cookies are small text files transferred to your computer or mobile when you visit a website or app. We use them to help us understand how people are using our services so that we can make them better.

Please be aware that some systems on our websites require the use of cookies, but we will always aim to state if this is the case.

## **Signing up to our e-Newsletter**

We use a third-party supplier (Mailchimp) to provide our newsletter service. By subscribing to this service, you will be agreeing to Mailchimp handling your data.

Our third-party supplier handles the data purely to provide this service on our behalf. Please note: You can unsubscribe from our mailings (electronic or hard copy) at any time. Simply hit "unsubscribe" at the bottom of the email, contact via email ([info@healthwatchkingston.org.uk](mailto:info@healthwatchkingston.org.uk)).

## **Information about people who share their experiences with us by other means**

There are a number of different ways that we collect feedback from people about their experiences of using health, social care and other public services. Our staff and other Authorised Representatives will visit different health, social care and other public service settings as part of our role to evaluate how services are being delivered. We also receive phone calls and requests for information directly from members of the public as part of our signposting service.

Where personally identifiable information is collected, we will

follow our lawful basis for processing. We will also follow any specific data retention instructions as part of contractual delivery arrangements/terms and conditions. Where we include personal experiences in reports or other publications, we will anonymise the information, unless we have your consent to publish your personal details.

There may be exceptional circumstances where we can and will process the data without consent (for a period of time), but we must have a lawful basis for doing so,

such as for safeguarding purposes. Please see our [Information Security and Governance Policy and Procedures](#) for further information.

### **Personal data received from other sources**

On occasion, we will receive information from the families, friends and carers of people who access health, social care and other public services. We use this data to inform providers and commissioners to help them deliver services that work for you and your community.

Where we receive personal data from other sources and where it is practically possible, we will follow our lawful basis for processing, when using information. We will only process your personal data where there is a lawful basis to do so under current data protection legislation.

For information on how New Dialogue/Healthwatch Kingston identifies an appropriate lawful basis for processing personal data and DPIA's, please see our policy on [Information Security and Governance Policy and Procedures](#).

### **Why New Dialogue shares data with Healthwatch England**

As part of our Healthwatch Kingston statutory service provision, we are required to share information with Healthwatch England to ensure that your views are considered at a national level. This enables them to analyse service provision across the country and supply the Department of Health and Social Care, and other national leads with the information you provide.

The information we provide to Healthwatch England contains no personally identifiable data. Any information that is used for national publications is anonymised (to the best of their ability).

### **People who contact us for information, advice and guidance through our signposting service**

In addition to ensuring that the voices of service users, patients and the public are heard by decision makers (as part of our Healthwatch statutory service), we also provide an information, advice and guidance service that signposts the public to health, social care and other public services. This includes:

1. A free, friendly and confidential service that is independent from health, social care and other public services.

2. We will perform a signposting role only. This means that we will give you the contact details for a range of services that best support your request. You will then need to contact those organisations yourself.
3. We can give you information about the choices you have and where you might get help in relation to your health, social care and other public service needs.
4. We can give you information about what to do when things go wrong, and you don't understand how to make a complaint.

When people contact us, we will process the following information in accordance with our lawful basis:

1. Email address – By sharing your email address with us, we will not add you to our mailing list or contact you for any other purpose than to share information about local and national sources of support appropriate to your needs (related to your signposting request).
2. A telephone number – Your telephone number will be used only in connection with your query and not for any other purpose. We might contact you with further suggestions or to clarify details about why you are contacting our service.
3. A summary of the circumstances surrounding the purpose of the call – We record this information to assist our staff in providing you with relevant information and to check that we have not missed opportunities to suggest possible sources of support.
4. We may also use it to share information with our commissioners or funders and other stakeholders about the types of queries we receive, in accordance with our lawful basis.
5. We may record where we signpost you to so that we can demonstrate and understand the type of signposting delivered.

### **Information about our staff, volunteers and people applying to work with us**

We need to process personal data about our staff, volunteers and people who apply to work for us, so that we can meet our legal and contractual responsibilities as an employer.

The personal data that we process may include information about ethnicity, religion, disability, gender and sexual orientation. We use this type of information to ensure equality, diversity, inclusion and equity within our recruitment process, workforce and volunteers in compliance with legislation.

Our employees and volunteers decide whether or not to share this monitoring data with us and can choose to withdraw their consent for this at any time.

Other personal data that we are required to process includes information on qualifications and experience, pay and performance, contact details, bank details, and information for HR or security purposes.

We also process data about monitoring ICT systems to ensure security, including monitoring and keeping logs of web pages visited and screening emails for phishing attacks.

We check that people who work for us are suitable for their roles. This may include asking people to undertake [Disclosure and Barring Service](#) (DBS) checks.

People joining New Dialogue, delivering the Healthwatch Kingston upon Thames statutory service or other projects, will be asked to complete a 'declaration of interests' form to identify any services with which they have close links (for example, because they have previously worked there or because the service is run by a close relative, etc.) or any other issues which may cause a perceived or real conflict of interest. We review this data regularly.

### **Safeguarding concerns**

If there is a safeguarding concern, New Dialogue will take immediate steps to safeguard people from harm in accordance with our [Safeguarding Policy and Procedures](#). We will not share your personal information relating to a safeguard concern with other bodies unless we feel it is necessary to protect you or other people. This might include information sharing with the Kingston upon Thames Multi Agency Safeguarding Hub (MASH) if we believe somebody to be at risk.

### **Children and Young People**

New Dialogue will not knowingly process the personal information of people under the age of 18 without the consent of a parent or guardian. In exceptional circumstances, we may need to disclose personal data about a child/young person if (for example) we have safeguarding concerns. In which case, we will follow our [Safeguarding Policy and Procedures](#).

### **Contact us**

You have the right to contact us at any time about our processing of your personal data including what personal data we may hold on you (if any); correcting and/or deleting

personal data; amending or withdrawing your consent to us processing/storing your personal data. Our details are below:

**Address:** Data Protection

New Dialogue/Healthwatch Kingston  
Suite 3, 2nd Floor  
Siddeley House  
50 Canbury Park Road  
Kingston upon Thames  
KT2 6LX

**Email:** [info@healthwatchkingston.org.uk](mailto:info@healthwatchkingston.org.uk)

**Complaints about how we look after or use your information**

If you have a complaint about how we process or store your information, please contact a senior manager and/or a Board member. You also have a right to request an independent assessment from the [Information Commissioner's Office](#).