

# CRANHAM VILLAGE SURGERY & LITTLE GAYNES SURGERY

## PRIVACY NOTICE

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<b>Developed by:</b>	Dr M Akhter - GP

This privacy notice explains why the GP Practice collects information about you, and how that information may be used in line with the General Data Protection Regulation (GDPR) 2018 rules.

You have a right to privacy under the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act. The Practice needs your personal, sensitive and confidential data in order to perform our statutory health duties, in the public interest or in the exercise of official authority vested in the controller in compliance with Article 6 (e) of the GDPR and for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the in compliance with the GDPR.

Contact details of the practice (the data controller)	Contact details of the Data Protection Officer
Cranham Village Surgery/ Little Gaynes Surgery 143 Ingrebourne Gardens Cranham Upminster RM14 1BJ	Dr Mohammed Akhter  01708228888 <a href="mailto:m.akhter@nhs.net">m.akhter@nhs.net</a>
The purposes of processing your data	Who will your data be shared with?
<p>The practice holds medical data confidentially so that we can provide you with quality healthcare and facilitate others to do so as well.</p> <p>Holding your data also allows us to check the quality of your care, coordinate with other health care professionals (e.g. the hospital) and perform research and training.</p> <p>The medical data can include:</p> <ul style="list-style-type: none"> <li>Basic details about you, such as address, date of birth, next of kin</li> <li>Contact we have had such as clinical visits</li> <li>Details and records about your care</li> <li>Results of investigations</li> <li>Relevant information from yourself or people who care for you e.g. health professionals and relatives</li> </ul>	<p>That data is primarily shared with staff who are involved in providing direct care</p> <p>There may be disclosures required by law or audit and for medical research/ health management purposes. For example:</p> <ul style="list-style-type: none"> <li>NHS England</li> <li>Our Commissioners</li> <li>NHS Trusts / Organisation (Hospitals, CCG's)</li> <li>Ambulance Service</li> <li>Social Services</li> </ul> <p>We may share your information, <b>with your</b> consent with:</p> <ul style="list-style-type: none"> <li>Education Services</li> <li>Local Authorities</li> <li>Voluntary Sector Providers</li> <li>Private Sector</li> </ul>

	<ul style="list-style-type: none"> <li>DVLA / The courts and other official bodies</li> </ul>
<b>Rights of objection</b>	<b>Retention period for your data</b>
You have the right to object regarding the storage or use of any part of your data in a certain way. This objection will be handled in line with practice complaints policy.	Typically, medical data for patients is kept until they leave the practice (through death or moving away.)
<b>Right to lodge a complaint</b>	<b>Right to access your records</b>
<p>If you are unhappy about how your data is handled, you can complain in writing to the practice at the addresses above.</p> <p>If you are unhappy with the response you receive, you can take it further to <a href="http://www.ico.gov.uk">www.ico.gov.uk</a></p>	<p>You have the right to access your records free of charge.</p> <ul style="list-style-type: none"> <li>Your request should be made to the practice manager or data protection officer</li> <li>We are required to respond to you within one Month</li> <li>You will need to give adequate information (for example full name, address, date of birth NHS number etc.)</li> </ul>
<b>What happens when there is a breach?</b>	<b>What about staff and 3<sup>rd</sup> parties?</b>
If there is a breach of your data protection rights that fulfil requirements – it will need to be reported to the Information Commissioners Office.	All staff have signed a clause that they will abide by these rules in relation to your data. Any 3 <sup>rd</sup> parties that handle your data must demonstrate that they are also compliant with GDPR protocols.
<b>Right to have your data corrected</b>	<b>Where can you find out more information?</b>
You have the right to have any inaccurate information about you corrected, although – in some circumstances – the previous information will be retained for auditing purposes.	For further information please visit the Information Commissioner's Office website at <a href="http://www.ico.gov.uk">http://www.ico.gov.uk</a>

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Detailed Privacy Notice follows on next page:

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**This is the privacy notice of Cranham Village Surgery . In this document, “we”, “our”, or “us” refers to Cranham Village Surgery, 143 Ingrebourne Gardens, RM14 1BJ**

**Telephone number: 01708228888**

**This website collects some personal data from users, as stated in our website provider’s [Privacy Policy](#).**

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**Our Practice aims to ensure the highest standard of medical care for our patients and we are committed to protecting and respecting your privacy. To do this we keep records about you, your health and the care we have provided, or plan to provide, to you. This Privacy Policy does not provide exhaustive details of all aspect of the collection and use of personal information by the practice. However, we are happy to provide any additional information or explanation needed.**

## **Introduction**

- This is a notice to inform you of our Policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (personal information) and information that could not. In the context of the law and this notice, ‘process’**

means collect, store, transfer, use or otherwise act on information

- We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately
- We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
- We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate
- Our Policy complies with UK law accordingly implemented, including that required by the [EU General Data Protection Regulation \(GDPR\)](#)
- The Law requires us to tell you about your rights and our obligations to you with regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [Know Your Privacy Rights](#)
- Except as set out below, we do not share, sell or disclose to a third party, any information collected through our website.

## What is GDPR?

The GDPR is the replacement for the Data Protection Act and comes into effect on the 25th of May 2018. Although it is European legislation the UK will be adopting GDPR into UK law even after Brexit. This youtube video helps explain some of the changes with the GDPR.

## **Caldicott Guardian**

### **The Caldicott Guardian/IG Lead is responsible for;**

- **Ensuring implementation of the Caldicott Principles and Data Security Standards with respect to Patient Confidential Data**
- **Ensuring that the Practice processes satisfy the highest practical standards for handling patient information and provide advice and support to Practice staff as required**
- **Ensuring that patient identifiable information is shared appropriately and in a secure manner. The Caldicott Guardian will liaise where there are reported incidents of person identifiable data loss or identified threats and vulnerabilities in Practice information systems to mitigate the risk.**

**The aim of the Caldicott Guardian is to ensure the organisation implements the Caldicott principles and data security standards; there is no need to appoint a Caldicott Guardian, but there is a need to have an Information Governance lead (sometimes referred to as a Caldicott lead) who, if they are not a clinician, will need support from a clinically qualified individual.**

## **Care Quality Commission (CQC)**

**The CQC regulates health and social care services to ensure that safe care is provided. The Law says that we must report certain serious events to the CQC, for example, when patient safety has been put at risk.**

## **Information about the Care Quality Care Commission (CQC)**

### **CCTV**

**Please note this policy is only applicable if CCTV has been installed.**

**Closed circuit TV is installed at our premises. This is for the purposes of staff, patient and premises security. Cameras are located at various places on the premises and images from the cameras are recorded. The use of CCTV falls within the scope of the Data Protection Act. Images from cameras and recordings are held on a computer system and held in secure storage with controlled access for the required statutory period.**

### **Child Health Information**

**We wish to make sure that your child has the opportunity to have immunisations and health checks when they are due. We share information about childhood immunisations, the 6-8 week new baby check and breast-feeding status with our NHS Trust health visitors and school nurses.**

### **Clinical Audit & Research**

#### **Clinical Audit**

**Information may be used by the CCG for clinical audit to monitor the quality of the service provided to patients with long-term conditions. Some of this information may be held**

**centrally and used for statistical purposes (e.g. the National Diabetes Audit). When this happens, strict measures are taken to ensure that individual patients cannot be identified from the data.**

## **Clinical Research**

**We fully respect your confidentiality and will not share your medical information with any identifiable data (no names, full postcodes, NHS numbers or full dates of birth).**

**If you have requested that your data is not to be shared outside the practice then your information will not be included in these statistics. However sometimes your information may be requested to be used for research purposes – we will always ask your permission before releasing your information for this purpose.**

**If you have any queries about this please ask to speak to the Practice Manager.**

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## **Complaining**

**When we receive a complaint, we record all the information you have given to us.**

**We use that information to resolve your complaint.**

**If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.**

**We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.**

## **How you can complain**

**If you are happy for your data to be extracted and used for the purposes described in this privacy notice then you do not need to do anything. If you have any concerns about how your data is shared then please contact the Practice.**

- **If you are not happy with our Privacy Policy or if have a complaint then you should tell us by writing to us**
- **If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration**
- **If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at [ICO concerns](#)**
- **The Information Commissioner  
Wycliffe House**



**Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Phone: 0303 123 1113**

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## **Confidentiality**

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### **Confidentiality Statement**

**We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the General Data Protection Regulation (GDPR), the NHS Codes of Confidentiality and Security, as well as guidance issued by the Information Commissioner's Office (ICO). You have a right to access the information we hold about you, and if you would like to access this information, you will need to write to the practice requesting the information. Furthermore, should you identify any inaccuracies; you have a right to have the inaccurate data corrected.**

**Anyone who receives information from us also has a legal duty to keep it confidential and secure.**

**All staff in the Practice sign a Confidentiality Agreement that explicitly makes clear their duties in relation to personal health information and the consequences of breaching that duty.**

**Please be aware that your information will be accessed by non-clinical Practice staff in order to perform tasks enabling**

the functioning of the Practice. These include, but not limited to:

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- typing referral letters to Hospital Consultants or allied Healthcare Professionals
  - opening letters from Hospitals and Consultants
  - scanning clinical letters, radiology reports and any other documents not available in electronic format
  - photocopying or printing documents for referral to Consultants
  - handling, printing, photocopying and postage of medical legal and insurance reports and of associated documents.
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## How we keep your information confidential and safe

Everyone working for our organisation is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for specific purposes in accordance with the law. [The NHS Digital Code of Practice on Confidential Information](#) applies to all NHS staff and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All our staff are expected to make sure information is kept confidential and receive regular training on how to do this.

The health records we use may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is

**kept confidential and secure. Your records are backed up securely in line with NHS standard procedures. We ensure that the information we hold is kept in secure locations, is protected by appropriate security and access is restricted to authorised personnel. We also make sure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed. We are committed to protecting your privacy and will only use information collected lawfully in accordance with:**

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- **Data Protection Act 2018**
  - **Human Rights Act**
  - **Common Law Duty of Confidentiality**
  - **NHS Codes of Confidentiality and Information Security**
  - **Health and Social Care Act 2015**
  - **And all applicable legislation**
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**We have a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing. This person is called the Caldicott Guardian.**

**We are registered with the Information Commissioner's Office (ICO) as a data controller which describes the purposes for which we process personal data. A copy of the registration is available from the [ICO's web site](#) by searching on our name.**

**We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if we reasonably believe that others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (such as a risk of serious harm to yourself or others) or where the law requires information to be passed on.**

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### **COVID-19 supplementary notice**

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**The health and social care system is facing significant pressures due to the coronavirus outbreak. Health and care information is essential to deliver care to individuals, to support health and social care services and to protect public health. Information will also be vital in researching, monitoring, tracking and managing the outbreak. In the current emergency, it has become even more important to share health and care information across relevant organisations.**

**This notice describes how GPs and other health and social care organisations may use your information within the health and social care system to protect you and others during the Coronavirus (COVID-19) outbreak with regard to your Summary Care Record.**

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**Further information regarding COVID-19 supplementary privacy notice from NHS UK**

**Documents – download or view**

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## Patient Information Leaflet

You can download or view our Patient information leaflet about GDPR (General Data Protection Regulation).

[Patient Information Leaflet about-GDPR](#)

DOWNLOAD

## Children's Privacy Policy

You can download/view our Children's Privacy Policy information leaflet shown below;

[Children's Privacy Information Leaflet](#)

DOWNLOAD

## Your Data

[NHS Digital Data Provision Notice for Individual GP Level Data – Information for Patients](#)

DOWNLOAD

## **Your Data Matters Leaflet**

DOWNLOAD

### **Data Controller**

**The Data Protection Act 2018 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information.**

**We are registered as the data controller and our registration can be viewed online in the public register at: [Register of fee payers](#).**

**Any changes to this notice will be published on our website and in a prominent area at the Practice.**

### **Data Processor**

**Data processors are responsible for the processing of personal data on behalf of the data controller. Processors must ensure that processing is lawful and that at least one of the following applies:**

- **The data subject has given consent to the processing of his/her personal data for one or more specific purposes**
- **Processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract**

- Processing is necessary for compliance with a legal obligation to which the controller is subject
  - Processing is necessary in order to protect the vital interests of the data subject or another natural person
  - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
  - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
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**At our Practice all staff are classed as data processors as their individual roles will require them to access and process personal data.**

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### **Data Protection Officer (DPO)**

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**The Data Protection Officer is responsible for ensuring the Practice remains compliant at all times with Data Protection, Privacy & Electronic Communications Regulations, Freedom of Information Act and the Environmental Information Regulations. The Data Protection Officer shall:**

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- Lead on the provision of expert advice to the Practice on all matters concerning the Data Protection Act, compliance, best practice and setting and maintaining standards

- Inform and advise the organisation and its employees of their data protection obligations under the GDPR
  - Monitor the organisation's compliance with the GDPR and internal data protection policies and procedures. This will include monitoring the assignment of responsibilities, awareness training, and training of staff involved in processing operations and related audits
  - Advise on the necessity of data protection impact assessments (DPIAs), the manner of their implementation and outcomes
  - Serve as the contact point to the data protection authorities for all data protection issues, including data breach reporting.
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The DPO will be independent and an expert in data protection. The DPO will be the Practice's point of contact with the Information Commissioner's Office. The DPO can be contacted via the contact details at the top of this notice. Please address your request for the attention of the Data Protection Officer (DPO).

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Please contact the Data Protection Officer if:

- You have any questions about how your information is being held
- If you require access to your information or if you wish to make a change to your
- information
- If you wish to make a complaint about anything to do with the personal and healthcare
- information we hold about you



- Or any other query relating to this Policy and your rights as a patient.
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### Data Retention

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We manage patient records in line with the Records Management NHS Code of Practice for Health and Social Care, which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England. This is based on current legal requirements and professional best practice. If you transfer to another GP and we are asked to transfer your records we will do this to ensure your care is continued.

Currently the NHS is required to keep GP records for 10 years after a patient has died. Exceptions to these rules are detailed in the [code of practice](#).

### Data Subject Access Requests (DSAR)

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**Data Subject Access Requests (DSAR):** You have a right under the Data Protection legislation to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:

- Your request should be made to the Practice – for information from the hospital you should write direct to them
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month

- You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified, and your records located information we hold about you at any time.
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## Department for Work and Pensions

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Our Practice is legally required to provide anonymised data on patients who have been issued with a fit note under the Fit for Work scheme. The purpose is to provide the Department for Work and Pensions with information from Fit Notes to improve the monitoring of public health and commissioning and quality of health services.

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## Identifying patients who might be at risk of certain diseases

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- Your medical records will be searched by a computer programme so that we can identify patients who might be at high risk from certain diseases such as heart disease or unplanned admissions to hospital.
  - This means we can offer patients additional care or support as early as possible.
  - This process will involve linking information from your GP record with information from other health or social care services you have used.
  - Information which identifies you will only be seen by this practice.
  - Contact us if you require more information on this.
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## Individual Funding Request

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**An 'Individual Funding Request' is a request made on your behalf, with your consent, by a Clinician, for funding of specialised healthcare which falls outside the range of services and treatments that CCG has agreed to commission for the local population. An Individual Funding Request is taken under consideration when a case can be set out by a patient's Clinician that there are exceptional clinical circumstances which make the patient's case different from other patients with the same condition and who are at the same stage of their disease, or when the request is for a treatment that is regarded as new or experimental and where there are no other similar patients who would benefit from this treatment. A detailed response, including the criteria considered in arriving at the decision, will be provided to the patient's Clinician.**

## **Invoice Validation**

**Invoice validation is an important process. It involves using your NHS number to check which CCG is responsible for paying for your treatment. [Section 251 of the NHS Act 2006](#) provides a statutory legal basis to process data for invoice validation purposes. We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.**

## **Job application and employment**

**If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.**

**If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.**

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### **Keeping your records up to date**

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**GDPR requires that the information we hold about you is accurate and current. We rely on our patients to tell us if they have moved house, or had medical treatment abroad. For our part, we will update your medical records at each consultation with a doctor or a nurse (either face to face, or by telephone), and with any relevant information we receive from hospital, community or social services providers (e.g. new diagnoses, change in circumstances).**

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### **Medicines Management**

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**CCG's and some GP Federations operate Pharmacist and prescribing advice services to support local GP practices with prescribing queries, which may require identifiable information to be shared. These Pharmacists work with your usual GP to provide advice on medicines and prescribing queries, and review prescribing of medicines to ensure that it is appropriate for your needs, is safe and also cost-effective. Where specialist prescribing support is required, the CCG Medicines Management Team may order medications on behalf of your GP Practice to support your care.**

**Supporting Locally Commissioned Services, CCGs support GP Practices by auditing anonymised data to monitor locally**

**commissioned services, measure prevalence and support data quality. The data does not include identifiable information.**

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### **Mobile phone**

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**If you provide us with your mobile phone number, we may use this to send you reminders about any appointments or other health screening information being carried out. This may be by telephone call or SMS text messaging, ( if this service is available). Please contact the reception if you wish to 'opt-out' of this service and this information will be added to your records.**

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### **National Fraud Initiative – Cabinet Office**

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**The use of data by the Cabinet Office for data matching is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the Data Protection Act 2018. Data matching by the Cabinet Office is subject to a Code of Practice. For further information see [UK Government publications code of data.](#)**

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### **National Registries**

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**National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.**

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## National Screening

The NHS provides national screening programmes so that certain diseases can be detected at an early stage. These currently apply to bowel cancer, breast cancer, aortic aneurysms and diabetic retinal screening service. The law allows us to share your contact information with Public Health England so that you can be invited to the relevant screening programme.

More information can be found at: [Population screening programmes](#), or if you prefer please contact the Practice. Please contact the Practice if you do not wish to participate in any National Screening programmes offered.

## National Data Opt-Out – General Practice Data for Planning and Research (GPDPR)

### NHS Digital want to collect

- data about diagnoses, symptoms, observations, test results, medications, allergies, immunisations, referrals, recalls and appointments, including information about physical, mental and sexual health
- data on sex, ethnicity and sexual orientation
- data about staff who have treated patients in a pseudonymised way (which is still personal data, as the data can be linked back).

Further information about General Practice Data for Planning and Research (GPDPR) and opting out can be found at [NHS Digital](#)

# Opt-outs

You have a right to object to your information being shared. Should you wish to [opt out of data collection](#), please contact a member of staff who will be able to explain how you can opt out and prevent the sharing of your information; this is done by registering a Type 1 opt-out, preventing your information from being shared outside this Practice.

If you have previously opted-out of any data sharing arrangements, your opt-out will continue to be valid.

## Other Matters

### Use of our website by children

- If you are under 18, you may use our website only with consent from a parent or guardian
- We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children
- Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site information they find, wherever they visit

### Encryption of data sent between us

**We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.**

**Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.**

## **NHS APP**

**The NHS App is a nationally run service that allows individuals to access a range of services within the Practice and beyond. NHS England and NHS Digital are joint data controllers of the NHS App and any personal data that is necessary for accessing the App. The data controller or processor of your personal data within a service accessed via the App will depend on the organisation accessed. Please see the [NHS App privacy notice](#) for further information**

## **NHS Digital**

**[NHS Digital](#) collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.**

**Our legal basis for sharing data with NHS Digital**

**NHS Digital has been legally directed to collect and analyse patient data from all GP practices in England to support the coronavirus response for the duration of the outbreak. NHS**



Digital will become the controller under the General Data Protection Regulation 2016 (GDPR) of the personal data collected and analysed jointly with the Secretary of State for Health and Social Care, who has directed NHS Digital to collect and analyse this data under the [COVID-19 Public Health Directions 2020](#) (COVID-19 Direction).

All GP practices in England are legally required to share data with NHS Digital for this purpose under the Health and Social Care Act 2012 (2012 Act). More information about this requirement is contained in the [data provision notice issued by NHS Digital to GP practices](#).

Under GDPR our legal basis for sharing this personal data with NHS Digital is Article 6(1)(c) – legal obligation. Our legal basis for sharing personal data relating to health, is Article 9(2)(g) – substantial public interest, for the purposes of NHS Digital exercising its statutory functions under the COVID-19 Direction.

The type of personal data we are sharing with  
NHS Digital

The data being shared with NHS Digital will include information about patients who are currently registered with a GP practice or who have a date of death on or after 1 November 2019 whose record contains coded information relevant to coronavirus planning and research. The data contains NHS Number, postcode, address, surname, forename, sex, ethnicity, date of birth and date of death for

those patients. It will also include coded health data which is held in your GP record such as details of:

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- diagnoses and findings
  - medications and other prescribed items
  - investigations, tests and results
  - treatments and outcomes
  - vaccinations and immunisations
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## How NHS Digital will use and share your data

NHS Digital will analyse the data they collect and securely and lawfully share data with other appropriate organisations, including health and care organisations, bodies engaged in disease surveillance and research organisations for coronavirus response purposes only. These purposes include protecting public health, planning and providing health, social care and public services, identifying coronavirus trends and risks to public health, monitoring and managing the outbreak and carrying out of vital coronavirus research and clinical trials. The British Medical Association, the Royal College of General Practitioners and the National Data Guardian are all supportive of this initiative.

NHS Digital has various legal powers to share data for purposes relating to the coronavirus response. It is also required to share data in certain circumstances set out in the COVID-19 Direction and to share [confidential patient information to support the response under a legal notice](#) issued to it by the Secretary of State under the Health

## Service (Control of Patient Information) Regulations 2002 (COPI Regulations).

[Legal notices](#) under the COPI Regulations have also been issued to other health and social care organisations requiring those organisations to process and share confidential patient information to respond to the coronavirus outbreak. Any information used or shared during the outbreak under these legal notices or the COPI Regulations will be limited to the period of the outbreak unless there is another legal basis for organisations to continue to use the information.

Data which is shared by NHS Digital will be subject to robust rules relating to privacy, security and confidentiality and only the minimum amount of data necessary to achieve the coronavirus purpose will be shared. Organisations using your data will also need to have a clear legal basis to do so and will enter into a data sharing agreement with NHS Digital. Information about the data that NHS Digital shares, including who with and for what purpose will be published in the NHS Digital [data release register](#).

For more information about how NHS Digital will use your data please see the [NHS Digital Transparency Notice for GP Data for Pandemic Planning and Research \(COVID-19\)](#).

## National Data Opt-Out

The application of the [National Data Opt-Out](#) to information shared by NHS Digital will be considered on a case by case

basis and may or may not apply depending on the specific purposes for which the data is to be used. This is because during this period of emergency, the National Data Opt-Out will not generally apply where data is used to support the coronavirus outbreak, due to the public interest and legal requirements to share information.

## Your rights over your personal data

To read more about the health and care information NHS Digital collects, its legal basis for collecting this information and what choices and rights you have in relation to the processing by NHS Digital of your personal data, see:

- the [NHS Digital GPES Data for Pandemic Planning and Research \(COVID-19\) Transparency Notice](#)
- the [NHS Digital Coronavirus \(COVID-19\) Response Transparency Notice](#)
- the [NHS Digital General Transparency Notice](#)
- [how NHS Digital looks after your health and care information](#)

## Payments

Contract holding GPs in the UK receive payments from their respective governments on a tiered basis. Most of the income is derived from baseline capitation payments made according to the number of patients registered with the practice on quarterly payment days. These amount paid per patient per quarter varies according to the age, sex and other demographic details for each patient. There are also

graduated payments made according to the practice's achievement of certain agreed national quality targets known as the Quality and Outcomes Framework (QUOF), for instance the proportion of diabetic patients who have had an annual review. Practices can also receive payments for participating in agreed national or local enhanced services, for instance opening early in the morning or late at night or at the weekends. Practices can also receive payments for certain national initiatives such as immunisation programs and practices may also receive incomes relating to a variety of non patient related elements such as premises. Finally there are short term initiatives and projects that practices can take part in. Practices or GPs may also receive income for participating in the education of medical students, junior doctors and GPs themselves as well as research.

In order to make patient based payments basic and relevant necessary data about you needs to be sent to the various payment services. The release of this data is required by English laws – *NHS England's powers to commission health services under the NHS Act 2006 or to delegate such powers to CCGs and the GMS regulations 2004 (73)1*.

## Prescriptions

# Processing of prescriptions

We process prescription requests on a daily basis. This involves our staff accessing information held about you on our computer database, to produce prescription(s) that you, your carer, nominated person, or Pharmacy has requested.

**Prescriptions can be requested using various methods: by telephone, online via our computer system, Electronic prescriptions, by post, in writing, via fax (if available) or in person. Please refer to our Prescription Procedure for further information. If using the postal service always allow extra time so you do not run out of your medication.**

## **Collection/uplift of prescriptions**

**We will always ask for your details when a prescription uplift request is received; this could be your name, date of birth and address, medication you requested, or Community Health Index Number (which uniquely identifies you). This ensures that we can produce your prescription(s) efficiently, and reduces the risk of an incorrect prescription being given to you or your nominated person/carer/Pharmacy.**

**Please allow the allotted time before uplifting your prescription. Prescriptions can be collected/sent via the following methods:**

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- **In person**
- **Via your nominated choice of person/organisation, this could be your carer, pharmacy, family member or friend (please be aware if you are not uplifting your own prescription we may ask for proof of identification from that person before we issue your**

**Prescription, and we may also require a signature for our own records)**

- **Post – if using the postal service, please always allow extra time when ordering your medication, as we cannot guarantee postal delivery schedules**
  - **Home delivery service – some Pharmacies may deliver your prescription directly to your home; please check with your local Pharmacist to see if they can provide this service for you**
- 

## **Processing of information**

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**The basis on which we process information about you**

**The Law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then, if required by Law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.**

**Lawful basis for processing**

**The legal basis will be**

***Article 6(1)(c) “processing is necessary for compliance with a legal obligation to which the controller is subject.”***

**And**

***Article 9(2)(h) “processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards ”***

**Information we process because we have a contractual obligation with you**

**When you join our Practice, receive medical services from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.**

**We may use it in order to:**

- **verify your identity for security purposes**
- **provide you with our services**



- provide you with suggestions and advice and how to obtain the most from using our website
- 

**We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.**

**We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.**

## **Why do we collect this information?**

**The NHS Act 2006 and the Health and Social Care Act 2012 invests statutory functions on GP Practices to promote and provide the health service in England, improve quality of services, reduce inequalities, conduct research, review performance of services and deliver education and training. To do this we will need to process your information in accordance with current data protection legislation to:**

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- Protect your vital interests;
- Pursue our legitimate interests as a provider of medical care, particularly where the individual is a child or a vulnerable adult;

- **Perform tasks in the public's interest;**
  - **Deliver preventative medicine, medical diagnosis, medical research; and**
  - **Manage the health and social care system and services.**
- 

## About the personal information we use

**We use personal information on different groups of individuals including:**

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- **Patients**
  - **Staff**
  - **Contractors**
  - **Suppliers**
  - **Complainants, enquirers**
  - **Survey respondents**
  - **Professional experts and consultants**
  - **Individual captured by CCTV**
- 

**The personal information we use includes information that identifies you like your name, address, date of birth and postcode. We also use more sensitive types of personal information, including information about racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic and biometric data, health; sex life or sexual orientation. The information we use can relate to personal and family details; education, training and employment details; financial details; lifestyle and social circumstances; goods and services; visual images; details held in the patient record; responses to surveys.**

## Information we process with your consent

**Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you with more information about our business, including job opportunities and our services, you provide your consent to us to process information that may be personal information.**

**Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.**

**Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.**

**Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.**

**We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.**

**You may withdraw your consent at any time by instructing us in writing. However, if you do so, you may not be able to use our website or our services further.**

## **Information we process for the purposes of legitimate interests**

**We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.**

**Where we process your information on this basis, we do after having given careful consideration to:**

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- **whether the same objective could be achieved through other means**
  - **whether processing (or not processing) might cause you harm**
  - **whether you would expect us to process your data, and whether you would consider it reasonable to do so**
- 

**For example, we may process your data on this basis for the purposes of:**

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- **record-keeping for the proper and necessary administration of our business or profession**
- **responding to unsolicited communication from you to which we believe you would expect a response**
- **protecting and asserting the legal rights of any party**

- insuring against or obtaining professional advice that is required to manage business or professional risk
  - protecting your interests where we believe we have a duty to do so
- 

## Information we process because we have a legal obligation

**We are subject to the Law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.**

**For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.**

**This may include your personal information.**

## Information we process may be categorised as special category data

**Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. For example information about an individuals:**

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- race
- ethnic origin
- health

- sex life or
  - sexual orientation
- 

**We may process this information for the purposes of medical diagnosis, provision of health treatment and management of the health of our patients and the community we serve.**

**Specific uses of information you provide to us**

**Healthcare Professionals who provide you with care maintain records about your health and any treatment or care you have received previously (e.g. NHS Trust, GP Surgery, Walk-in clinic, etc.). These records are used to help to provide you with the best possible healthcare.**

**NHS healthcare records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Records we hold about you may include the following information;**

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- **Details about you, such as your name, address, carers, legal representatives and emergency contact details**
- **Any contact the Surgery has had with you, such as appointments, clinic visits, emergency appointments, etc.**
- **Notes and reports about your health**
- **Details about your treatment and care**

- Results of investigations such as laboratory tests, x-rays, etc.
  - Relevant information from other Healthcare Professionals, relatives or those who care for you
- 

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used within our GP Practice for clinical audit to monitor the quality of the service provided. Some of this information will be held centrally and used for statistical purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified.

Sometimes your information may be requested to be used for research purposes – the Surgery will always gain your consent before releasing the information for this purpose.

## Who else may ask to access your information

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- The Court can insist that we disclose medical records to them
- Solicitors often ask for medical reports. These will always be accompanied by your signed consent for us to disclose information. We will not normally release details about other people that are contained in your records (e.g. wife, children parents etc.) unless we also have their consent
- Social Services – The Benefits Agency and others may require medical reports on you from time to time.

**These will often be accompanied by your signed consent to disclose information. Failure to cooperate with these agencies can lead to loss of benefit or other support. However, if we have not received your signed consent we will not normally disclose information about you**

- **Insurance Companies frequently ask for medical reports on prospective clients. These are always accompanied by your signed Consent Form. We will only disclose the relevant medical information as per your consent. You have the right, should you request it, to see reports prepared for Insurance Companies or employers before they are sent. We may contact you on receipt of a third party request to discuss your consent and clarify what will be shared**
  - **If you have any questions about the above points please contact the Practice.**
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## **Access to to your own information**

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- **Confirmation that your personal information is being held or used by us**
  - **Access to your personal information**
  - **Additional information about how we use your personal information**
- 

**Although we must provide this information free of charge, if your request is considered unfounded or excessive, or if you request the same information more than once, we may charge a reasonable fee.**



**If you would like to access your personal information, you can do this by submitting a written request to the Practice at the address shown at the top of this page.**

**Once we have received your request and you have provided us with enough information for us to locate your personal information, we will respond to your request without delay, within one month (30 days). However If your request is complex we may take longer, by up to two months, to respond. If this is the case we will tell you and explain the reason for the delay.**

## **Rights to object**

**You have the right under Article 21 of the GDPR to object to your personal information being processed. Please contact the Practice if you wish to object to the processing of your data. You should be aware that this is a right to raise an objection which is not the same as having an absolute right to have your wishes granted in every circumstance.**

**GP Practices process personal data under Article 6(1)(c) on a lawful and legitimate basis where the organisation is obliged under law to comply with**

- **The General Data Protection Regulations (GDPR)**
- **The Freedom of Information Act**
- **The NHS Constitution**
- **The Local Authority Social Services and National HealthService Complaints (England) Regulations**

**2009**

**By complying with these laws, the Practice has compelling legitimate grounds for the processing which override the interests, rights and freedoms in the right to object.**

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## **The right to rectification**

**If the personal information we hold about you is inaccurate or incomplete you have the right to have this corrected.**

**If it is agreed that your personal information is inaccurate or incomplete we will aim to amend your records accordingly, normally within one month, or within two months where the request is complex. However, we will contact you as quickly as possible to explain this further if the need to extend our timescales applies to your request. Unless there is a risk to patient safety, we can restrict access to your records to ensure that the inaccurate or incomplete information is not used until amended.**

**If for any reason we have shared your information with anyone else, such as for a referral to another service, we will notify them of the changes required to ensure their records are accurate.**

**If on consideration of your request we do not consider the personal information to be inaccurate then we will add a comment to your record stating your concerns about the information. If this is the case we will contact you within one month to explain our reasons for this.**

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## Public Health

Public health encompasses everything from national smoking and alcohol policies, the management of epidemics such as flu, the control of large scale infections such as TB and Hepatitis B to local outbreaks of food poisoning or Measles. Certain illnesses are also notifiable; the doctors treating the patient are required by law to inform the Public Health Authorities, for instance Scarlet Fever.

This will necessarily mean the subjects personal and health information being shared with the Public Health organisations.

Some of the relevant legislation includes: [the Health Protection \(Notification\) Regulations 2010 \(SI 2010/659\)](#), [the Health Protection \(Local Authority Powers\) Regulations 2010 \(SI 2010/657\)](#) , [the Health Protection \(Part 2A Orders\) Regulations 2010 \(SI 2010/658\)](#) , [Public Health \(Control of Disease\) Act 1984](#), [Public Health \(Infectious Diseases\) Regulations 1988](#) and [The Health Service \(Control of Patient Information\) Regulations 2002](#)

## Registering for NHS care

NHS Digital collects health information from the records health and social care providers keep about the care and treatment they give, to promote health or support improvements in the delivery of care services in England.

- All patients who receive NHS care are registered on a national database

- This database holds your name, address, date of birth and NHS Number but it does not hold information about the care you receive
  - The database is held by NHS Digital, a national organisation which has legal responsibilities to collect NHS data.
  - More information can be found at [NHS Digital](#) or you can telephone general enquiries on 0300 303 5678
  - [NHS England's privacy notice](#)
  - [NHS App privacy policy](#)
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## Risk Stratification

**‘Risk stratification for case finding’ is a process for identifying and managing patients who have or may be at-risk of health conditions (such as diabetes) or who are most likely to need healthcare services (such as people with frailty). Risk stratification tools used in the NHS help determine a person’s risk of suffering a particular condition and enable us to focus on preventing ill health before it develops.**

**Information about you is collected from a number of sources including NHS Trusts, GP Federations and your GP Practice.**

**A risk score is then arrived at through an analysis of your de-identified information. This can help us identify and offer you additional services to improve your health.**

**Risk-stratification data may also be used to improve local services and commission new services, where there is an identified need. In this area, risk stratification may be commissioned by the our NHS Clinical Commissioning Group (OCCG). Section 251 of the NHS Act 2006 provides a statutory legal basis to process data for risk stratification purposes.**

Further information about [risk stratification](#).

If you do not wish information about you to be included in any risk stratification programmes, please let us know. We can add a code to your records that will stop your information from being used for this purpose. Please be aware that this may limit the ability of healthcare professionals to identify if you have or are at risk of developing certain serious health conditions.

## Safeguarding

The Practice is dedicated to ensuring that the principles and duties of safeguarding adults and children are holistically, consistently and conscientiously applied with the wellbeing of all, at the heart of what we do.

Our legal basis for processing For the General Data Protection Regulation (GDPR) purposes is: –

*Article 6(1)(e) ‘...exercise of official authority...’*

For the processing of special categories data, the basis is: –

*Article 9(2)(b) – ‘processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law...’*

Sending a message to our Practice Team

**When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our Practice. We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.**

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## **Sharing of information**

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# **Local Information Sharing**

**Your GP electronic patient record is held securely and confidentially on an electronic system managed by your registered GP Practice. If you require attention from a local Healthcare Professional outside of your usual practice services, such as in an Evening and Weekend GP Access Clinic, GP Federation Service, Emergency Department, Minor Injury Unit or Out Of Hours service, the professionals treating you are better able to give you safe and effective care if some of the information from your GP record is available to them.**

**Where available, this information can be shared electronically with other local healthcare providers via a secure system designed for this purpose. Depending on the service you are using and your health needs, this may involve the Healthcare Professional accessing a secure system that enables them to view parts of your GP electronic patient record ,or a secure system that enables them to view your**

**full GP electronic patient record (e.g. EMIS remote consulting system).**

**In all cases, your information is only accessed and used by authorised staff who are involved in providing or supporting your direct care. Your permission will be asked before the information is accessed, other than in exceptional circumstances (e.g. emergencies) if the Healthcare Professional is unable to ask you and this is deemed to be in your best interests (which will then be logged).**

## **Disclosure and sharing of your information**

### **Information we obtain from third parties**

**We sometimes receive data that is indirectly made up from your personal information from third parties whose services we use. No such information is personally identifiable to you.**

### **Information provided on the understanding that it will be shared with a third party**

**We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances**

(i.e. life or death situations), where the law requires information to be passed on and / or in accordance with the new information sharing principle following Dame Fiona Caldicott's information sharing review (Information to share or not to share) where *"The duty to share information can be as important as the duty to protect patient confidentiality."* This means that Health and Social Care Professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott principles. They should be supported by the policies of their employers, regulators and professional bodies.

## Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations;

- NHS Trusts / Foundation Trusts
- GPs
- NHS Commissioning Support Units
- Independent Contractors such as Dentists, Opticians & Pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Clinical Commissioning Groups
- Social Care Services
- Health and Social Care Information Centre (HSCIC)
- Local Authorities
- Education Services



- Fire and Rescue Services
  - Police & Judicial Services
  - Voluntary Sector Providers
  - Private Sector Providers
  - Other 'data processors' which you will be informed of
- 

You will be informed who your data will be shared with and in some cases asked for explicit consent for this to happen, when required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure.

## What to do if you don't want your information shared

Please tell us if you don't want your information to be shared – either in some or all circumstances. We can make a note on your record that will ensure that your records can only be accessed by a health professional in the Practice (i.e. no administrative staff will be able to look at your records) or we can block your health data so that it can't be accessed by other health service bodies e.g. Electronic Care Record.

## Information submitted online

**The practice website allows for the submission of some personal information for the purposes of updating your medical record e.g. new contact details. The service is provided by accredited suppliers, and all information submitted is covered by the same regulations as all other patient information.**

## **Patient Rights (as the Data Subject)**

### **The right to erasure**

**The right to erasure is also known as “the right to be forgotten” and in general refers to an individual’s right to request the deletion or removal of personal information where there is no compelling reason for the Practice to continue using it.**

**As with other rights, there are particular conditions around this right and it does not provide individuals with an absolute right to be forgotten.**

**Individuals have the right to have their personal information deleted or removed in the following circumstances:**

- When it is no longer necessary for the purpose for which it was collected**
- When the Practice no longer have a legal basis for using your personal information, for example if you gave us consent to use your personal information**

in a specific way, and you withdraw your consent, we would need to stop using your information and erase it unless we had an overriding reason to continue to use it

- When you object to the Practice using your personal information and there is no overriding legitimate interest for us to continue using it.
  - If we have used your personal information unlawfully
  - If there is a legal obligation to erase your personal information for example by court order
- 

**The Practice can refuse to deal with your request for erasure when we use your personal information for the following reasons:**

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- to comply with a legal obligation for the performance of a public interest task or exercise of official authority
  - for public health purposes in the public interest
  - archiving purposes in the public interest, scientific research historical research or statistical purpose
  - the exercise or defence of legal claims
- 

## The right to restrict processing

You have the right to control how we use your personal information in some circumstances. This is known as the right to restriction. When processing is restricted, the

**Practice is permitted to store your personal information, but not further use it until an agreement is reached with you about further processing. We can retain enough information about you to ensure that your request for restriction is respected in the future.**

**Examples of ways you can restrict our processing would be:**

- **If you challenge the accuracy of your personal information, stop using it until we check its accuracy**
- **If you object to processing which is necessary for the performance of our tasks in the public interest or for the purpose of legitimate interests, we will restrict our processing while we consider whether our legitimate grounds override your individual interests, rights and freedoms**
- **If our use of your personal information is found to be unlawful and you ask for restriction instead of full erasure we will restrict our processing**
- **If we no longer need your personal information but you need it to establish, exercise or defend a legal claim, we will restrict our processing.**

**If we have shared your personal information with any individuals or organisations, if we restrict our processing, we will tell those individuals or organisations about our restriction if it is possible and not an unreasonable amount of effort.**

**Whenever we decide to lift a restriction on processing we will tell you.**

# Direct Care Emergencies

**There are occasions when intervention is necessary in order to save or protect a patient's life or to prevent them from serious immediate harm, for instance during a collapse or diabetic coma or serious injury or accident. In many of these circumstances the patient may be unconscious or too ill to communicate.**

**In these circumstances we have an overriding duty to try to protect and treat the patient. If necessary we will share your information and possibly sensitive confidential information with other emergency healthcare services, the police or fire brigade, so that you can receive the best treatment.**

## Social Prescribing

**Social Prescribing enables GPs, nurses and other primary care professionals to refer people to a range of local, non-clinical services. NHS England describes social prescribing as “enabling all local agencies to refer people to a link worker”. Link workers – known locally as Community Connectors – give people time, and focus on what matters to the person. They connect people to community groups and agencies for practical and emotional support. If you have an appointment with a Community Connector, only limited information would be passed on. There are agreements in place to protect your data.**

## Summary Care Record (SCR)

The NHS in England uses a national electronic record called the [Summary Care Record \(SCR\)](#) to support patient care. It contains key information from your GP record. Your SCR provides authorised healthcare staff with faster, secure access to essential information about you in an emergency or when you need unplanned care, where such information would otherwise be unavailable.

Summary Care Records are there to improve the safety and quality of your care. SCR core information comprises your allergies, adverse reactions and medications. An SCR with additional information can also include reason for medication, vaccinations, significant diagnoses / problems, significant procedures, anticipatory care information and end of life care information. Additional information can only be added to your SCR with your agreement.

Please be aware that if you choose to opt-out of SCR, NHS Healthcare Staff caring for you outside of this Surgery may not be aware of your current medications, allergies you suffer from and any bad reactions to medicines you have had, in order to treat you safely in an emergency. Your records will stay as they are now with information being shared by letter, email, fax or phone.

You have the option to opt out of the summary care record, if you wish to do this please contact the surgery and we will update your record accordingly.

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have over this, the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 2018.

### [NHS digital looking after information and data](#)

## The NHS Constitution

[The NHS Constitution](#) establishes the principles and values of the NHS in England. It sets out the rights patients, the public and staff are entitled to. These rights cover how patients access healthcare services, the quality of care received, the treatments and programmes available, confidentiality, information and a patient's right to complain if things go wrong.

## Use of Information

Use of information we collect through automated systems when you visit our website

## Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised

**experience and the website owner with statistics about how you use the website so that it can be improved.**

**Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.**

**Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.**

**Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.**

**If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.**

**We use cookies in the following ways:**

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- **to track how you use our website**
  - **to record whether you have seen specific messages we display on our website**
  - **to keep you signed in our site**
  - **to record your answers to surveys and questionnaires on our site while you complete them**
- 

**Personal identifiers from your browsing activity**



**Requests by your web browser to our servers for web pages and other content on our website are recorded.**

**We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.**

**We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.**

**If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.**

**Data may be processed outside the European Union**

**Our website is hosted in the United Kingdom.**

**We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.**

**Accordingly data obtained within the UK or any other country could be processed outside the European Union.**

**For example online patient forms on our website are encrypted and delivered securely to the NHS system by an email service provider based in the United States of America. Their systems comply with provisions certified under the EU-U.S. and Swiss-U.S. [Privacy Shield frameworks](#), a mechanism for cross border transfer of personal data.**

## **Video and Telephone Consultations**

**As an alternative to face to face appointments, there may be instances where we may offer you an appointment via telephone or video consultation. By accepting the invitation and entering the consultation you are consenting to this. Your personal/confidential patient information shared on the consultation will be safeguarded in the same way it would with any other consultation with relevant information added to your patient record.**

**Video or audio consultations/appointments are not typically recorded, but if are, your permission will be sought as to the purpose and use of the recording i.e.: for direct care purposes: diagnosis, treatment or care. Recordings will be stored as part of your patient record in line with NHS Digital Record Management Code of Practice (2016).**

**If, as part of the consultation, still images or photographs are taken/obtained and are to be kept, they will be securely stored as part of your patient record in line with NHS Digital Record Management Code of Practice (2016).**

**If the recording/images are to be used for any other reason than what the original permission was obtained for, then further permission would be required prior to that use.**

**If recordings or still images obtained are no longer needed (i.e.: adequately described in the clinical notes) then the recording/ images will be confidentially and securely destroyed as per our policies and in line with NHS Digital's guidance.**

## **Your Rights**

### **The right of access**

**Individuals have the right to access their personal data and a request can be made verbally or in writing. We have one month to respond to a request and in most circumstances we cannot charge a fee. Please refer to our [Subject Access Request](#) section for further information.**

### **The right to rectification**

**The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. We have one month to respond to a request and in some circumstances, we may refuse this request.**

### **The right to data portability**

**The right to data portability allows individuals to obtain and re-use their personal information for their own purposes across different services. It allows them to move, copy or transfer personal information easily from one IT environment to another in a safe and secure way. For example: it enables consumers to take advantage of applications and services which can use their information to find them a better deal. The right to data portability only applies when the individual has submitted their personal information directly, through electronic means to our Practice. This means that in most circumstances the right to data portability does not apply within the Practice.**

## **Rights related to automated decision making and profiling**

**You have the right to object to any instances where a decision is made about you solely by automated means without any human involvement, including profiling.**

**The Practice does not undertake any decision-making about you using wholly automated means.**

## **Invoking your rights**

**If you wish to invoke any of the data subject rights then please write to The Practice Manager, at the above address.**

# Compliance with the Law

**Our Privacy Policy has been compiled so as to comply with the Law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the Law of your jurisdiction, we would like to hear from you.**

**However, ultimately it is your choice as to whether you wish to use our website.**

## Further Information – Understanding Patient Data

**Understanding Patient Data’ supports better conversations about the uses of health information. Our aim is to explain how and why data can be used for care and research, what’s allowed and what’s not, and how personal information is kept safe. We work with patients, charities and Healthcare Professionals to champion responsible use of data.**

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**Further information & guidance**

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## Review of this Privacy Policy

**We may update this Privacy Notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.**

**If you have any question regarding our Privacy Policy, please  
contact us.**

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