



Privacy Notice for Healthcare

Version control

Date	Version	Created/ Amended by	Review	Comments
June 2018	1	Tracy Dempsey		Created
31 Oct 2019	2	Tracy Dempsey	01/11/22	Amended format and added postage clause
February 2024	3	Tracy Dempsey	February 2027	Reviewed

How we collect and use your personal information

This fair processing notice explains why the Company collects information about you and how that information may be used. The provisions below apply to all the services we provide which involve us in keeping records about you.

The health care 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 help to provide you with the best possible healthcare.

NHS and non-NHS health 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 which this Company holds about you may include the following information, which can be entered directly into our IT systems, received electronically into our IT systems, or on paper, in which case it is scanned into the system, then the paper copy destroyed:

- Details about you, such as your address, carer, legal representative, 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 health 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 our contracts with the NHS. Information may be used within the Company 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 Company will always gain your consent before releasing the information for this purpose.

We will automatically seek consent from anyone aged 16 or over, but if we deem a younger person to be competent to understand, we may also seek consent from them, without involving a parent or guardian.

Risk Stratification

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a particular condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from a number of sources including NHS Trusts and from this GP Practice. A risk score is then arrived at through an analysis of your de-identified information using software managed by our associated Data Processors:

Egton Medical Information Systems, partners and subsidiaries
Greater Manchester Integrated Care Partnership
NHS England, which collects data to manage the NHS and monitor service quality etc,

and other providers of data processing systems with whom we or they may engage with from time to time and is only provided back to your GP as data controller in an identifiable form.

Risk stratification enables your GP to focus on preventing ill health and not just the treatment of sickness. If necessary your GP may be able to offer you additional services.

Please note that you have the right to opt out of your data being used in this way.

Medicines Management

The Company may be asked to participate in reviews of medications prescribed to its patients. This service performs a review of prescribed medications to ensure patients receive the most appropriate, up to date and cost-effective treatments. This service is provided to practices within Greater Manchester Medicines Management Group.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- The General Data Protection Regulation 2018. Under the General Data Protection Regulations 2018, the practice is defined as a “Data Controller” and has a legal right to gather and process your personal information under the following Articles of the Regulation:
The lawful basis for processing special category health data for direct care is that processing is:
‘necessary... in the exercise of official authority vested in the controller’ (Article 6(1)(e))
necessary for compliance with a legal obligation to which the controller is subject’ (Article 6(1)(c))
‘necessary for the purposes of preventative 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...’ (Article 9(2)(h)).
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management
- The Caldicott Review “Information: To Share or Not to Share”

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential. We have a programme of training for our staff in confidentiality principles, internal processes to ensure the physical security of our premises, and a policy of compliance with NHS rules on safe transfer of information when sharing your data with other agencies. 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 outside those listed below 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 Caldicott principle 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?

Under the General Data Protection Regulation 2018, we may also have to share your information with the following organisations to comply with our legal duties set out in Article 6(1)(e) ‘...for the performance of a task carried out in the public interest...’ and Article 9(2)(j) ‘...research purposes...’:

We therefore do not require your consent to share data with these agencies:

- NHS Trusts / Foundation Trusts
- Other local GP Practices and the Rochdale Health Alliance
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Partnerships
- Social Care Services
- The Health and Social Care Information Centre (HSCIC) at NHS England HQ
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police & Judicial Services
- 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 happen when this is required.

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

Access to personal information

You have a right under the General Data Protection Regulation 2018 to request access to view or to obtain copies of what information the Company holds about you and to have it amended should it be inaccurate. In order to request this, you need to do the following:

- Your request can be made verbally or in writing to the Chief Officer – for information from the hospital you should write direct to them
- There will be no charge for a single copy, but there may be a charge to have more than one printed copy of the information held about you
- We are required to respond to you within 28 days
- 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.
- One copy of our records will be supplied for free, in paper or electronic format as agreed at the time of the request. Paper copies and electronic media will be left at reception at the relevant site for the service you used for collection. We will not accept the cost and risk of posting them.

Objections / Complaints

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 Chief Officer.

Cookies

There are Site and Service Terms and Conditions, and a Privacy and Usage Statement on our website which gives details of third party cookies we use to improve our services. We never use first party or tracking cookies on our website.

Change of Details

It is important that you tell the person treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

Notification

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

This information is publicly available on the Information Commissioners Office website www.ico.org.uk.

The Company is registered with the Information Commissioners Office (ICO), and has appointed a Data Protection Officer to ensure we comply with the GDPR. You can contact the DPO using the contact details on our website to ask for a message to be sent to them.

Who is the Data Controller?

The Data Controller, responsible for keeping your information secure and confidential is:
GP Care Services Ltd. Our ICO registration number is **Z182439**

Complaints

Should you have any concerns about how your information is managed by the Company please contact the Chief Officer.

If you are still unhappy following a review by the Company, you can then complain to the Information Commissioners Office (ICO). Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF www.ico.org.uk email: casework@ico.org.uk telephone: 0303 123 1113 (local rate) /01625 545 700.