Privacy Notice for Patients

Data Protection Privacy Notice for Patients

Introduction

This privacy notice lets you know what happens to any personal data that you give to us, or any information that we may collect from you or about you from other organisations.

This privacy notice applies to personal information processed by or on behalf of Mount Road Practice

This Notice explains:

- Who we are and how we use your personal information?
- Information about our Data Protection Officer
- What kinds of personal information we hold about you and what information we use
- The legal grounds for processing your personal information, including when we share it with other organisations.
- What to do if your personal information changes
- For how long your personal information is retained for/stored by us
- What your rights are under Data Protection laws

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA18) became law on 25th May 2018. The GDPR is a single EU-wide regulation on the protection of confidential and sensitive information and the DPA18 implements the regulations into comprehensive UK legislation. Following the decision for the UK to leave the European Union and following the end of the transition period, from January 1st, 2021, the UK has been subject to an Adequacy Agreement which will allow data to continue to be shared with European Union Countries without further safeguarding being necessary. This is to allow the European Commission suitable time to grant the UK with adequacy status, meaning they have met the required standards in ensuring data transfers to and from the UK are safe. All references to GDPR will now be referred to as UK GDPR.

For the purpose of applicable data protection legislation (including UK GDPR) and the Data Protection Act 2018 the practice responsible for your personal data, and referred to at the Data Controller, is Mount Road Practice.

This Notice describes how we collect, use, and process your personal data, and how in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

How we use your information and the law

Mount Road Practice will be the “Data Controller” of your personal data.

We collect basic personal data about you, which includes name, address, telephone number, email address, date of birth, next of kin information, NHS number etc.

We will also collect sensitive confidential data known as “special category personal data”, in the form of health information, religious beliefs, (if required in a healthcare setting) ethnicity, sexuality etc. and we may also receive this information about you from other health providers or third parties.

Your rights over your personal information

As an individual you have the following rights over your personal information:

Right to be informed – you have the right to be informed on how we handle, process, and share your personal information; this privacy notice ensures as a practice we satisfy this right.

Right to access your personal information– you can request access to and/or copies of the personal data we hold about you, free of charge (subject to exemptions) within one calendar month. Such requests can be made verbally or in writing, but we do request that you provide us with adequate information to process your request, such as providing full name, address, date of birth, NHS number and details of your request and, where necessary, any documents to verify your identity.

On processing a request there may be occasions when information may be withheld if we as a practice believe that releasing the information to you could cause serious harm or distress. Information may also be withheld if another person (i.e., third party) is identified in the record, and they do not want their information disclosed to you. However, if the other person mentioned in your records was acting in their professional capacity in caring for you, in normal circumstances they could not prevent you from having access to that information.

To request a copy or request access to information we hold about you and/or to request information to be corrected if it is inaccurate, please contact: Practice Manager

Right to rectification - The correction of personal data when incorrect, out of date or incomplete will be acted upon within one calendar month of receipt of such a request. Please ensure Mount Road Practice has the correct contact details for you at all times.

Right to erasure - Under Article 17 of the UK GDPR individuals have the right to have personal data erased. This is also known as the ‘right to be forgotten’. The right is not absolute and only applies in certain circumstances, for example when your personal data is no longer necessary for the purpose which it was originally collected or processed for, or if you wish to withdraw your consent after you have previously given your consent.

Right to restrict processing – Article 18 of the UK GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that you can limit the way that the practice uses your data. This is an alternative to requesting the erasure of your data. Individuals have the right to restrict the processing of their personal data where they have a particular reason for wanting the restriction.

Right to data portability - The right to data portability gives individuals the right to receive personal data they have provided to the Practice in a structured, commonly used, and machine-readable format (i.e., email, upload to a portable device etc.).

Right to object to processing – you have the right to object to processing, however, please note if we can demonstrate compelling legitimate grounds which outweighs your interest, then processing can continue. If we did not process any information about you and your health care if would be very difficult for us to care and treat you.

Rights in relation to automated decision making and profiling - Automated individual decision-making is a decision made by automated means (i.e., a computer system) without any human involvement. If any of the processes we use rely on automated decision making, you do have the right to ask for a human to review any computer-generated decision at any point.

Why we need your information.

The healthcare professionals who provide you with care maintain records about your health and any treatment or care you have received previously. These records help to provide you with the best possible healthcare and treatment.

NHS health records may be electronic, paper-based or a mixture of both. We use a combination of working practices and technology to ensure that your information is kept confidential and secure.

Records about you may include the following information:

- Details about you, such as your address, your carer or legal representative and emergency contact details.
- Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments.
- 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.
- Contact details (including email address, mobile telephone number and home telephone number)

To ensure you receive the best possible care, your records are used to facilitate the care you receive, including contacting you. Information held about you may be used to help protect the health of the public and to help us manage the NHS and the

services we provide. Limited information may be used within the GP practice for clinical audit to monitor the quality of the service we provided.

How we lawfully use your data.

We need your personal, sensitive, and confidential data in order to provide you with healthcare services as a General Practice, under the UK GDPR we will be lawfully using your information in accordance with:

> *Article 6 (1)(e) 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.*
>
> *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.*

This Privacy Notice applies to the personal data of our patients and the data you have given us about your carers/family members.

Risk Stratification

Risk stratification data tools are increasingly being used in the NHS to help determine a person's risk of suffering a condition, preventing an unplanned or (re)admission and identifying a need for preventive intervention. Information about you is collected from several sources including NHS Trusts and from this GP Practice. The identifying parts of your data are removed, analysis of your data is undertaken, and a risk score is then determined. This is then provided back to your GP as data controller in an identifiable form. Risk stratification enables your GP to focus on initiatives for preventing ill health and not just the treatment of sickness, so being far more proactive in an ever-changing health climate. As a result of risk stratification, your GP may be able to offer you additional services.

Individual Risk Management at a GP practice level however is deemed to be part of your individual healthcare and is covered by our legal powers above.

Our data processor for Risk Stratification is:

Population Health Management

Population Health Management improves population health by data driven planning and delivery of proactive care to achieve maximum impact. It includes segmentation, stratification and impactability modelling to identify local 'at risk' cohorts - and, in turn, designing and targeting interventions to prevent ill-health and to improve care and support for people with ongoing health conditions and reducing unwarranted variations in outcomes.

The benefits of Population Health Management are

- Using data-driven insights and evidence of best practice to inform target
- interventions to improve the health & wellbeing of specific populations &
- cohorts
- The wider determinants of health, not just health & care
- Making informed judgements, not just relying on the analytics
- Prioritising the use of collective resources to have the best impact
- Acting together – the NHS, local authorities, public services, the VCS,
- communities, activists & local people. Creating partnerships of equals
- Achieving practical tangible improvements for people & communities

Information about you is collected from several sources including NHS Trusts and from this GP Practice. The identifying parts of your data are removed, and an analysis of your data is undertaken. This analysis may be undertaken by external organisations who are acting on behalf of your GP Practice and have a Data Processing contract with the Practice. This is then provided back to your GP as data controller in an identifiable form. As a result of population health management, your GP may be able to offer you additional services.

Medicines Management

The Practice may conduct Medicines Management 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. The reviews are carried out by the Integrated Care Boards Medicines Management Team under a Data Processing contract with the Practice.

Patient Communication

The Practice would like to use your name, contact details, and email address to inform you of NHS services, or provide inform about your health/information to manage your healthcare or information about the management of the NHS service. There may be occasions where authorised research facilities would like you to take part in research in regard to your particular health issues, to try and improve your health. Your contact details may be used to invite you to receive further information about such research opportunities, but you must give your explicit consent to receive messages for research purposes.

GP-Connect

The Practice use a facility called GP Connect to support your direct care. GP Connect makes patient information available to all appropriate clinicians when and where they need it, to support direct patients care, leading to improvements in both care and outcomes.

GP Connect is not used for any purpose other than direct care.

Authorised Clinicians such as GPs, NHS 111 Clinicians, Care Home Nurses (if you are in a Care Home), Secondary Care Trusts, Social Care Clinicians are able to

access the GP records of the patients they are treating via a secure NHS England service called GP connect.

The NHS 111 service (and other services determined locally e.g. Other GP practices in a Primary Care Network) will be able to book appointments for patients at GP practices and other local services.

The legal bases for direct care via GP Connect is the same as the legal bases for the care you would receive from your own GP, or another healthcare provider:

For the processing of personal data:

Article 6.1 (e) of the uK GDPR: '… performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

For the processing of "Special Category Data" (which includes your medical information):

Article 9.2 (h) of the UK GDPR:'… the purposes of preventive or occupational medicine……'

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 patients at the heart of what we do.

Our legal basis for processing information for safeguarding purposes, as stipulated in the UK GDPR 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…'

Categories of personal data

The data collected by Practice staff in the event of a safeguarding situation, will be minimised to include only the personal information as is necessary in order to handle the situation. In addition to some basic demographic and contact details, we will also process details of what the safeguarding concern is. This is likely to be special category information.

Sources of the data

The Practice will either receive or collect information when someone contacts the organisation with safeguarding concerns, or we believe there may be safeguarding concerns and make enquiries to relevant providers.

Recipients of personal data

The information is used by the Practice when handling a safeguarding incident or concern. We may share information accordingly to ensure duty of care and

investigation as required with other partners such as local authorities, the police or healthcare professionals (i.e., their GP or mental health team).

Research

Clinical Practice Research Datalink (CPRD) collects anonymised patient data from a network of GP practices across the UK. Primary care data is linked to a range of other health related data to provide a fully representative UK population health dataset. You can opt out of your information being used for research purposes at any time and full details on CRPD can be found here:

https://cprd.com/transparency-information

General Practice Data for Planning and Research

The Government is delaying the implementation of the General Practice Data for Planning and Research (GP DPR) programme until four key areas of work are strengthened:

- *the ability for patients to opt out or back in to sharing their GP data with NHS England, with data being deleted even if it has been uploaded*
- *the backlog of opt-outs has been fully cleared*
- *a Trusted Research Environment (TRE) is available where approved researchers can work securely on de-identified patient data which does not leave the environment*
- *a campaign of engagement and communication has increased public awareness of the programme, explaining how data is used and patient choices*

This delay will also provide more time to speak with patients, doctors, health charities and others.

This Privacy Notice will be updated when further details of the proposed implementation have been confirmed, and this may not be for at least another 12 months.

For further information please refer to NHS Digitals webpage on this subject matter

The NHS needs data about the patients it treats in order to plan and deliver its services and to ensure that care and treatment provided is safe and effective. The **General Practice Data for Planning and Research** data collection will help the NHS to improve health and care services for everyone by collecting patient data that can be used to do this. For example, patient data can help the NHS to:

- monitor the long-term safety and effectiveness of care.
- plan how to deliver better health and care services.
- prevent the spread of infectious diseases.
- identify new treatments and medicines through health research.

GP practices already share patient data for these purposes, but this new data collection will be more efficient and effective. We have agreed to share the patient data we look after in our practice with NHS England who will securely store, analyse, publish, and share this patient data to improve health and care services for everyone. This includes:

- informing and developing health and social care policy
- planning and commissioning health and care services
- taking steps to protect public health (including managing and monitoring the coronavirus pandemic)
- in exceptional circumstances, providing you with individual care.
- enabling healthcare and scientific research

This means that we can get on with looking after our patients and NHS England can provide controlled access to patient data to the NHS and other organisations who need to use it to improve health and care for everyone.

Contributing to research projects will benefit us all as better and safer treatments are introduced more quickly and effectively without compromising your privacy and confidentiality.

NHS England has engaged with the British Medical Association (BMA), Royal College of GPs (RCGP) and the National Data Guardian (NDG) to ensure relevant safeguards are in place for patients and GP practices.

Summary Care Records (SCR)

All patients registered with a GP have a Summary Care Record, unless they have chosen not to have one. The information held in your Summary Care Record gives registered and regulated healthcare professionals, away from your usual GP practice, access to information to provide you with safer care, reduce the risk of prescribing errors and improve your patient experience.

Your Summary Care Record contains basic (Core) information about allergies and medications and any reactions that you have had to medication in the past.

During the height of the pandemic changes were made to the Summary Care Record (SCR) to make additional patient information available to all appropriate clinicians when and where they needed it, to support direct patients care, leading to improvements in both care and outcomes.

These changes to the SCR will remain in place, unless you decide otherwise.

Regardless of your past decisions about your Summary Care Record preferences, you will still have the same options that you currently have in place to opt out of having a Summary Care Record, including the opportunity to opt-back in to having a Summary Care Record or opt back in to allow sharing of Additional Information.

You can exercise these choices by doing the following:

1. **Choose to have a Summary Care Record with all information shared**. This means that any authorised, registered and regulated health and care professionals will be able to see a detailed Summary Care Record, including Core and Additional Information, if they need to provide you with direct care.
2. **Choose to have a Summary Care Record with Core information only**. This means that any authorised, registered and regulated health and care professionals will be able to see limited information about allergies and medications in your Summary Care Record if they need to provide you with direct care.
3. **Choose to opt-out of having a Summary Care Record altogether**. This means that you do not want any information shared with other authorised, registered and regulated health and care professionals involved in your direct care. You will not be able to change this preference at the time if you require direct care away from your GP practice. This means that no authorised, registered and regulated health and care professionals will be able to see information held in your GP records if they need to provide you with direct care, including in an emergency.

To make these changes, you should inform your GP practice or complete this form and return it to your GP practice.

The legal bases for direct care via SCR is the same as the legal bases for the care you would receive from your own GP, or another healthcare provider:

For the processing of personal data:

Article 6.1 (e) of the uK GDPR: '… performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

For the processing of "Special Category Data" (which includes your medical information):

Article 9.2 (h) of the UK GDPR:'… the purposes of preventive or occupational medicine……'

How the NHS and care services use your information – Opt Out

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments

- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at: https://understandingpatientdata.org.uk/what-you-need-know (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Health and care organisations have until July 31st, 2022, to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care. Our organisation 'is currently' compliant with the national data opt-out policy. "

The legal bases for processing this information.

The Health and Social Care Act 2012 covers the sharing and collection of health and care data. It says that when the Secretary of State for Health and Social Care needs to collect and analyse data to help the health service, they can tell NHS England to do this for them. The instruction, which NHS England must act on, is called a **direction**. In this case:

1.) The Secretary of State for Health and Social Care sent a direction to NHS England, instructing them to collect and analyse general practice data for health and social care purposes including policy, planning, commissioning, public health, and research purposes.

2.) NHS England sent all GP practices a document called a Data Provision Notice, giving details of the data it needs GP Practices like ours to share so it can comply with the direction. All GP Practices in England are required to share data with NHS England when they are sent a Data Provision Notice.

Under data protection law, we can only share patient data if we have a legal basis under Articles 6 and 9 of the UK GDPR. Our legal basis for sharing patient data with NHS England is **Article 6(1)(c) - legal obligation, as we are required under the 2012 Act to share it with NHS England.**

When we are sharing patient data about health, we also need a legal basis under Article 9 of the UK GDPR. This is:

- **Article 9 (2)(g)** – as we are sharing patient data for reasons of substantial public interest, for the purposes of NHS England exercising its statutory functions under the General Practice Data for Planning and Research Directions. It is substantially in the public interest to process patient data for planning and research purposes to improve health and care services for everyone. This is permitted under paragraph 6 of Schedule 1 of the Data Protection Act 2018 (DPA).
- **Article 9 (2)(h)** – as we are sharing patient data for the purposes of providing care and managing health and social care systems and services. This is permitted under paragraph 2 of Schedule 1 of the DPA.
- **Article 9 (2)(i)** - as patient data will also be used for public health purposes. This is permitted under paragraphs 3 of Schedule 1 of the DPA.
- **Article 9 (2)(j)** - as patient data will also be used for the purposes of scientific research and for statistical purposes. This is permitted under paragraph 4 of Schedule 1 of the DPA.

Third party processors

In order to deliver the best possible service, the practice will share data (where required) with other NHS bodies such as other GP practices and hospitals. In addition, the practice will use carefully selected third party service providers. When we use a third-party service provider to process data on our behalf then we will always have an appropriate agreement in place to ensure that they keep the data secure, that they do not use or share information other than in accordance with our instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties include:

- Companies that provide IT services & support, including our core clinical systems; systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings or electronic prescription services; document management services etc.
- Delivery services (for example if we were to arrange for delivery of any medicines to you).
- Payment providers (if for example you were paying for a prescription or a service such as travel vaccinations).

Further details regarding specific third-party processors can be supplied on request to the practice.

How we maintain the confidentiality of your records

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

- Data Protection Act 2018
- The UK General Data Protection Regulations (UK GDPR)
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012
- NHS Codes of Confidentiality, Information Security and Records Management
- Information: To Share or Not to Share Review

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential.

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 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.

Our practice policy is to respect the privacy of our patients, their families, and our staff and to maintain compliance with the UK GDPR and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our patients will be protected.

All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. The practice will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for Mount Road Practice an appropriate contract will be established for the processing of your information.

In certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Liz Moreton in writing if you wish to withdraw your consent. If some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

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 in an identifiable format. In some circumstances you can Opt-out of the surgery sharing any of your information for research purposes.

With your consent we would also like to use your information

There are times that we may want to use your information to contact you or offer you services, not directly about your healthcare, in these instances we will always gain your consent to contact you. We would however like to use your name, contact details, and email address to inform you of other services that may benefit you. We will only do this with your consent. There may be occasions where authorised research facilities would like you to take part on innovations, research, improving services or identifying trends, you will be asked to opt into such programmes if you are happy to do so.

At any stage where we would like to use your data for anything other than the specified purposes and where there is no lawful requirement for us to share or process your data, we will ensure that you have the ability to consent and opt out prior to any data processing taking place.
This information is not shared with third parties or used for any marketing and you can unsubscribe at any time via phone, email or by informing the practice.

Where we store your electronic information

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the UK.

No third parties have access to your personal data unless the law allows them to do so, and appropriate safeguards have been put in place such as a Data Processing agreement. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category data.

EMIS Web

The Practice uses a clinical system provided by a Data Processor called EMIS. Since June 2019, EMIS commenced storing your practice's EMIS Web data in a highly secure, third party cloud hosted environment, namely Amazon Web Services ("AWS").

The data will remain in the UK at all times and will be fully encrypted both in transit and at rest. In doing this there will be no change to the control of access to your data and the hosted service provider will not have any access to the decryption keys. AWS is one of the world's largest cloud companies, already supporting numerous public sector clients (including the NHS), and it offers the very highest levels of security and support.

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
- GP's
- Primary Care Networks
- NHS Commissioning Support Units
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- Integrated Care Boards
- Social Care Services
- NHS England (NHSE)
- Multi Agency Safeguarding Hub (MASH)
- 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 consent for this to happen when this is required.

Computer System of Choice

This practice operates a Clinical Computer System of Choice on which NHS Staff record information securely. This information can then be shared with other clinicians so that everyone caring for you is fully informed about your medical history, including allergies and medication.

To provide around the clock safe care, unless you have asked us not to, we will make information available to our Partner Organisations (as listed above). Wherever possible, their staff will ask for your consent before your information is viewed.

Shared Care Records

To support your care and improve the sharing of relevant information to our partner organisations when they are involved in looking after you, we will share information to other systems. You can opt-out of this sharing of your records with our partners at any time if this sharing is based on your consent.

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. All employees and sub-contractors engaged by our practice are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for Mount Road Practice an appropriate contract will be established for the processing of your information.

Sharing your information without consent

We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:

- where there is a serious risk of harm or abuse to you or other people.
- Safeguarding matters and investigations
- where a serious crime, such as assault, is being investigated or where it could be prevented.
- notification of new births
- where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not HIV/AIDS)
- where a formal court order has been issued
- where there is a legal requirement, for example if you had committed a Road Traffic Offence.

How long we store your information for

We are required under UK law to keep your information and data for the full retention periods as specified by the NHS Records management code of practice for health and social care and national archives requirements. More information on records retention can be found in the NHS Records Management Code of Practice 2021

Destruction

This will only happen following a review of the information at the end of its retention period. Where data has been identified for disposal, we have the following responsibilities:

- to ensure that information held in manual form is destroyed using a cross-cut shredder or contracted to a reputable confidential waste Shreddit that complies with European Standard EN15713 and obtain certificates of destruction.
- to ensure that electronic storage media used to store, or process information are destroyed or overwritten to national standards.

Primary Care Networks

The objective of Primary Care Networks (PCNs) is for group practices working together to create more collaborative workforces which ease the pressure of GP's, leaving them better able to focus on patient care. The aim is for all areas within England to be covered by a PCN.

Primary Care Networks form a key building block of the NHS long-term plan. Bringing general practices together to work at scale has been a policy priority for some years for a range of reasons, including improving the ability of practices to recruit and retain staff; to manage financial and estates pressures; to provide a wider range of services to patients and to integrate with the wider health and care system more easily.

All GP practices are expected to come together in geographical networks covering populations of approximately 30–50,000 patients and take advantage of additional funding attached to the GP contract.

This means the practice may share your information with other practices within the PCN to provide you with your care and treatment.

Mount Road Practice is a member of the Newcastle North Primary Care Network which includes the following local GP Practices:

Dr Harbidge & Partners
Talke Clinic
Heathcote Surgery
Audley Health Centre

Access to your personal information

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. For any request you should:

- Make your request directly to the practice. (For information from a hospital or other Trust/ NHS organisation you should write directly to them).
- Be aware that there is no charge to have a copy of the information held about you.
- Be aware that information must be released to you within one calendar month (unless in exceptional circumstances, which you will be informed of a part of the process)
- Be aware you may be asked for key information to process the request (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 retrieved.

What to do if your personal information changes

You should tell us so that we can update our records as we are required to keep accurate and up-to-date records at all times. Please contact the Practice as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number). The practice will from time to

time ask you to confirm that the information we currently hold is accurate and up to date.

Objections/Complaints

Should you have any concerns about how your information is managed at the practice, please contact Liz Moreton in the first instance. If you are still unhappy following a review of your concerns by the practice, you have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office using the contact details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545745
https://ico.org.uk/

If you are happy for your data to be 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 Data Protection Officer, Caldicott Guardian or IG Lead.

If you would like to know more about your rights in respect of the personal data that we hold about you, please use the contact details below:

IG Lead:
Liz Moreton

Caldicott Guardian:
Bhushan Rao

Data Protection Officer:
Paul winter
governance@staffsstoke.icb.nhs.uk

Useful Links

Please find below some links to external webpages which you may wish to access to find out additional information:

- Information Commissioners Office
- Information Governance Alliance
- NHS Digital
- NHS Digital Guide to Confidentiality in Health and Social Care
- Health Research Authority
- Health Research Authority Confidentiality Advisory Group (CAG)

- National Data Opt-Out