

The Redcliffe Surgery  
 Your information  
 And what you should now  
 (Privacy Notice)



<p><b>What is Privacy Notice?</b></p>	<p><i>It's a statement by the Practice to patients, service users, visitors, carers, the public and staff, that describes how we collect, use, retain and disclose personal information which we hold. It is sometimes also referred to as a Privacy Statement, Fair Processing Statement or Privacy Policy. This privacy notice is part of our commitment to ensure that we process your personal information/data fairly and lawfully</i></p>
<p><b>Why issuing Privacy Notice?</b></p>	<ul style="list-style-type: none"> <li>- <i>It explains the rights you have to control how we use your information</i></li> <li>- <i>It shows that our organization recognises the importance of protecting personal and confidential information in all what we do and that we take care to meet our legal and regulatory duties</i></li> <li>- <i>It demonstrates our commitment to our values of respecting diversity, acting with integrity, demonstrating compassion, striving for excellence and listening and supporting others.</i></li> <li>- <i>It demonstrates our transparency and openness</i></li> </ul>
<p><b>Data controller</b> (Name and address)</p>	<p><i>The Redcliffe Surgery is a Data controller for the data they hold about their patients.</i>  <i>Address: 10 Redcliffe Street, London, SW10 9DT</i>  <i>Tel: 0207 460 2222</i>  <i>Email: redcliffesurgery@nhs.net</i></p>
<p><b>Data Protection Officer</b> (Name and contact details )</p>	<p><i>Mr Warwick Young</i>  <i>Email: <a href="mailto:redcliffesurgery@nhs.net">redcliffesurgery@nhs.net</a></i>  <i>Tel: 0207 460 2222</i></p>
<p><b>What sort of Data is collected by the Practice</b></p>	<p><i>Examples of patient data that is recorded by the practice:</i></p> <ul style="list-style-type: none"> <li>- <i>Name, Surname and next of kin</i></li> <li>- <i>Address</i></li> <li>- <i>Date of Birth</i></li> <li>- <i>NHS number</i></li> <li>- <i>Contact details such as; email, phone number</i></li> <li>- <i>Demographic information, such as age, gender, ethnicity, language, residence, marital status, religion, disability, etc.</i></li> <li>- <i>Medical history, current conditions and treatment</i></li> </ul>
<p><b>The purpose for processing the above data and the legal basis for processing the data by the Practice</b></p>	<ul style="list-style-type: none"> <li>- <b>Consent</b>, in relation to your medical record your consent will be requested for two things:       <ul style="list-style-type: none"> <li>● <b>Consent to <i>Share In</i></b> - this allows staff at this organization to view all the information in your record.</li> <li>● <b>Consent to <i>Share Out</i></b> - <b>this will allow records from this service to be added to your shared record.</b></li> </ul> </li> </ul> <p><i>Article 6(1)(a) EU GDPR states that; "The data subject has given consent to the processing of his or her personal data for one or more specific purposes;"</i></p> <ul style="list-style-type: none"> <li>- <b>For direct patient care and to improve individual care</b></li> </ul>

	<ul style="list-style-type: none"> <li>- <b>To improve diagnosis, develop new treatments, prevent disease and to understand more about disease risks and causes</b></li> <li>- <b>To improve patients safety</b></li> <li>- <b>Public Interest – to protect the health and safety of the general public</b>  <i>“Article 6(1)(e) EU GDPR states that; “processing is necessary for the performance of a task carried out in the <b>public interest</b> or in the exercise of official authority vested in the controller;”  And article 9(2)(h) EU GDPR states that; “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 referred to in paragraph 3;”</i> <ul style="list-style-type: none"> <li>- <b>For compliance with a legal obligation.</b>  <i>Sometimes the practice is required by law to report certain information to the appropriate authorities, for example; reporting to the Police for the purpose of crime mapping.  Article 6(1)(c) EU GDPR “processing is necessary for compliance with a legal obligation to which the controller is subject;”</i></li> <li>- <b>For medical research.</b>  The lawful basis and special category condition are 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;” and Article 9(2)(j) “processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes”.</li> <li>- <b>To train healthcare professionals (we are a training practice)</b></li> <li>- <b>For Vital Interest.</b>  Article 6(1)(d) “processing is necessary in order to protect the vital interests of the data subject or of another natural person;”</li> </ul> </li> </ul>
<b>With whom Data are shared</b>	<p><i>The Redcliffe Surgery is registered with the Information Commissioners Office (ICO) to process personal and sensitive information under the Data Protection Act 1998. Our registration number is.....</i></p> <p><i>Our registration can be viewed online at: <a href="https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/">https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/</a></i></p> <p><i>We collect key information about patients, their medical conditions</i></p>

	<p>and clinical care. This information is maintained in our patients' paper health record (Stored by independent documents storage company called <b>Box-it</b>) and also held electronically on computer systems (our clinical system is called <b>System One</b>).</p> <p>All information is held in accordance with the Principles of the Data Protection Act 1998 and all NHS staff has a legal duty to maintain your confidentiality.</p> <ul style="list-style-type: none"> <li>- We share your data within the organization between us staff (clinical and non-clinical) for purpose of providing our services and direct care to our patients. Only information relevant for specific purpose is shared.</li> <li>- We might share information with other NHS providers or social care organizations for the purpose of on-going care or treatment and again only relevant information is shared. For example: Hospitals, NHS Community services such as diabetes, social services, etc.</li> <li>- Sometimes data disclosures are required by law or clinical audit requirements (England only) – In order to comply with its legal obligations this practice may send data to NHS Digital when directed by the Secretary of State for Health under the Health and Social Care Act 2012. And – This practice contributes to national clinical audits and will send the data which are required by NHS Digital when the law allows. This may include demographic data, such as date of birth, and information about your health which is recoded in coded form, for example; the clinical code for diabetes or high blood pressure.</li> <li>- Disclosures for medical research or health management purposes – our practice do <b>NOT</b> contributes to medical research</li> </ul>
<p><b>Risk Stratification Tool</b></p>	<p>Is a process for identifying and managing patients who are at a higher risk of emergency hospital admission, mainly because of a long term clinical condition such as Cancer or COPD.</p> <p>NHS England encourages GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help prevent avoidable admissions.</p> <p>Information about patients 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 anonymous information using computer programmes. Your information is only provided back to your GP or member of your care team in an identifiable form. Risk Stratification enables GPs to focus on the prevention of ill health and not just the treatment of sickness. If necessary your GP may be able to offer you additional services such as referral to My Care My Way service.</p>

<p><b>How do we maintain your records?</b></p>	<p><i>Your health records are held in both paper and computer forms. Everyone working in our organization and in general in NHS has a legal duty to keep information about you confidential. Generally, only those members of staff directly involved in providing your care are able to see the information.</i></p> <p><i>The details of staff, volunteers, trainees and job applicants are held electronically and on paper.</i></p> <p><b><u>Our method of storage and current control includes:</u></b></p> <ul style="list-style-type: none"> <li>- <i>Box-it stores our Patients physical records</i></li> <li>- <i>Patient’s Electronic records are kept on a secure NHS network which has the same level of encryption as internet banking with password control. Staff (clinical and non-clinical go through an intensive identity check to obtain a Smartcard which allows the controlled access to patients record.</i></li> <li>- <i>Staff documents are stored in a locked cabinets</i></li> <li>- <i>Database spreadsheets - password protected</i></li> <li>- <i>Emails – NHSn email is encrypted and password protected</i></li> </ul> <p><b><u>At Redcliffe Surgery we all have a duty to:</u></b></p> <ul style="list-style-type: none"> <li>- <i>Maintain full and accurate records of the care we provide to you</i></li> <li>- <i>Keep records about you confidential and secure</i></li> <li>- <i>Provide information in a format that is accessible to you, for example; large type if you are partially sighted, interpreter if you do not speak English.</i></li> <li>- <i>Complete Statutory and Mandatory Training programmes yearly set up by the UK Core Skills Training Framework (CSTF) which addresses all the knowledge outcomes at level 1 and 2 and at level 3, where appropriate for e-learning.</i></li> </ul>
<p><b>Retention Schedule</b></p>	<p><i>Different types of records are kept for different periods of time; It depends on the type of record.</i></p> <p><i>Our practice will approach the management of 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, based on current legal requirements and professional best practice.</i></p> <p><i>Guidelines on retention of records in healthcare could be found on NHS Digital website at <a href="https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care">https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care</a></i></p>
<p><b>What rights do you have as a patient?</b></p>	<ul style="list-style-type: none"> <li>- <b><i>Confidentiality</i></b> under the Data Protection act 1998, the Human Right Act 1998, Common law duty of confidence and General Data Protection Regulations (GDPR) – post</li> </ul>

	<p>25th May 2018</p> <ul style="list-style-type: none"> <li>- <b>Ask for a copy of all records held about you free of charge unless excessive</b> (post 25<sup>th</sup> May 2018) – under Data Protection Act 1998 patients have the right to access/view information that Practices hold about them, and to have it amended or removed should it be inaccurate. This is known as ‘the right of subject access’(SARs). Practice must handle (SARs) in 30 working days.</li> <li>- <b>The right to Opt Out of any data collection at the practice including Risk Stratification.</b> Please contact the Practice Manager or your GP to discuss how the disclosure of your personal information can be restricted.</li> <li>- <b>Complaints</b> - If you have concerns or are unhappy about any of our services, please contact the Practice Manager. you can also visit our website for more details on how to submit a complaint, comment or suggestion at <a href="http://theredcliffesurgery.co.uk/comments-and-suggestions.html">http://theredcliffesurgery.co.uk/comments-and-suggestions.html</a></li> </ul>
How can you help us as a patient?	<ul style="list-style-type: none"> <li>- Pointing out any information in your record which is out of date or wrong, for example; telling us when you change address, GP Practice, or telephone number.</li> <li>- By allowing us to share as much information about you as we need to in order to provide you with the best possible healthcare (<b>Consent to Share Out</b>) and to avoid duplications and delays in your care.</li> </ul>
Mobile Numbers & Email Addresses	<p>If you provide us with your mobile phone number, we may use this to send you <b>SMS</b> reminders about your appointments or other health screening information. <b>Please let us know if you do not wish to receive reminders on your mobile.</b></p> <p><b>We do not use SMS messages for any form of direct marketing. All text messages are for direct medical care purposes only.</b></p> <p>If you provide us with your email address, we may use this to send you reminders to make an appointment for a review. <b>Please let us know if you do not wish to receive correspondence by email.</b></p>
List of bodies we are governed by	<ul style="list-style-type: none"> <li>- Department of Health <a href="https://www.gov.uk/government/organisations/department-of-health-and-social-care">https://www.gov.uk/government/organisations/department-of-health-and-social-care</a></li> <li>- Information commissioner’s Office - <a href="https://ico.org.uk/">https://ico.org.uk/</a></li> <li>- Care Quality Commission - <a href="http://www.cqc.org.uk/">http://www.cqc.org.uk/</a></li> <li>- NHS England - <a href="https://www.england.nhs.uk/">https://www.england.nhs.uk/</a></li> </ul>
List of key legislation we are governed by	<ul style="list-style-type: none"> <li>- Data Protection Act 1998</li> <li>- Human Rights Act 1998 (Article 8)</li> <li>- Access to Health Records Act 1990</li> <li>- Freedom of information Act 2000</li> <li>- Health and Social Care Act 2012, 2015</li> <li>- Public Records Act 1958</li> </ul>

	<ul style="list-style-type: none"> <li>- <i>Copyright Design and Patents Act 1988</i></li> <li>- <i>The Re-use of Public Sector Information Regulations 2015</i></li> <li>- <i>The Environmental Information Regulations 2004</i></li> <li>- <i>Computer Misuse Act 1990</i></li> <li>- <i>The Common Law Duty of Confidentiality</i></li> <li>- <i>The Care Record Guarantee of England</i></li> <li>- <i>The Social Care Record Guarantee for England</i></li> <li>- <i>Information Security Management – NHS Code of Practice</i></li> <li>- <i>Records Management – Code of Practice for Health &amp; Social Care 2016</i></li> <li>- <i>Accessible Information Standards (AIS)</i></li> <li>- <i>General Data Protection Regulations (GDPR) – post 25<sup>th</sup> May 2018</i></li> </ul>
<p><b>Our partner organisations</b></p>	<p><i>Sometimes we might have to share your information with the following organizations:</i></p> <ul style="list-style-type: none"> <li>- <i>NHS Trusts / Specialist Trusts</i></li> <li>- <i>GPs</i></li> <li>- <i>Independent Contractors such as dentists, opticians, pharmacists</i></li> <li>- <i>Voluntary Sector Providers</i></li> <li>- <i>Ambulance Trusts</i></li> <li>- <i>Clinical Commissioning Groups</i></li> <li>- <i>Social Care Services</i></li> <li>- <i>Local Authorities</i></li> <li>- <i>Education Services</i></li> <li>- <i>Fire and Rescue Services</i></li> <li>- <i>Police</i></li> <li>- <i>Voluntary Sector Providers</i></li> <li>- <i>Private Sector Providers</i></li> <li>- <i>Other ‘Data Processors ‘which you will be informed of</i></li> </ul> <p><i>We will share your information with your explicit consent unless there are exceptional circumstances such as when the health or safety of others is at risk, where the law requires it or to carry out a statutory function.</i></p>
<p><b>GDPR Privacy Library</b></p>	<p><i>We hold a library of Privacy Notices linked to each of the main ways we use data and each of the main organisations we share data with. This leaflet serves as an oversight with the additional notices available in the folder within the main practice waiting room, and on the website.</i></p> <p><i>Privacy Notices are also available via email upon request – <a href="mailto:redcliffesurgery@nhs.net">redcliffesurgery@nhs.net</a></i></p>
<p><b>Reviews of and Changes to our Privacy Notice</b></p>	<p><i>We will keep our Privacy Notice under regular review. This notice was last reviewed following GDPR implementation on 25th May 2018.</i></p>