


**The New Surgery
128 Canterbury Road, Folkestone**

**PATIENT PARTICIPATION GROUP
GDPR POLICY**

In order to keep members informed at all times the email addresses of all members will be held by the Practice, the Chair, Vice Chair and Secretary.

All group emails will be sent Blind Copied (bcc) so as not to share email addresses with other members.

Signed:  (Acting Chair)

Dated: 17 September 2019



E-Bulletin from National Association for Patient Participation Issue Number 142 July - August 2019

1. Latest N.A.P.P. News.

a. **Trustee and Treasurer recruitment:** N.A.P.P. is actively recruiting new trustees to extend the range of skills and experience of the board and to replace those trustees, including the Treasurer, who have resigned at the end of their terms of office. Details about the commitment required, job description and application form can be downloaded from our website at <http://www.napp.org.uk/recruitment.html> **The closing date for applications is Friday 13th September.** For further information please email recruitment@napp.org.uk

b. **N.A.P.P. 2019 Conference “Celebrating General Practice, Quality for Patients”**

If you were unable to attend or to follow the live-streaming on 15th June, member PPGs can see videos of the plenary sessions. Also uploaded more recently are the salient points which arose from the workshop sessions [here](#)

c. **Corkill Award:** Presentations from the two joint winning PPGs (from a very strong field of 12 who entered) are also on the website. You can see and hear them describing their inspirational activities in Video 2 [here](#)

d. **N.A.P.P.’s Charitable Status:** Following the vote at the Annual General Meeting on 15th June, the Board is proceeding with the steps to change its charitable status to that of a Charitable Incorporated Association (CIO), a process which may take some time. The Board thanks the many PPGs who responded to the request for sent proxy votes.

2. Bite Size Guide to what GDPR means to PPGs

Over the last eighteen months surrounding the introduction of the General Data Protection Act (GDPR) in May 2018, N.A.P.P. has received numerous requests from PPGs and practice staff for guidance on this thorny topic. PPGs have reported practices preventing them from collecting patients’ email addresses or terminating their ability to communicate by email with patients, due to concerns about patient confidentiality and consent, N.A.P.P. has provided advice, but so far, there was no definitive guidance from NHS England. The NHS England Patient and Public Voice team have now produced a Bite-size Guide to what the GDPR means to PPGs, which you will find as a separate document sent with this bulletin. It confirms the guidance which N.A.P.P. has provided over recent months. **The document is attached with this bulletin.**

3. NHS England Community Grants 2019 – applications open till 23rd September

Voluntary, community or social enterprise groups, including PPGs, which have done outstanding involvement work that has improved healthcare services, are eligible to apply for grants of up to £2500 from NHS England. To check that your organisation and project is eligible, read the [2019 guidelines for community grant applicants](#) pack before you apply. Find out about previous years’ projects in the [community grants section](#) of the Involvement Hub on the NHS England and NHS Improvement website. More details [here](#).

4. How PPGs can engage with Primary Care Networks (PCNs)

PCNs provide an opportunity to rethink how patients are involved in decisions about local services – and for practices to consider how working with patients could make a positive contribution to the aims of the PCN. View the [Podcast: Time for a bigger patient group?](#) which provides food for thought about how PPGs can work cooperatively to influence the Primary Care network, while maintaining their independence at practice level.

Effective Date 1/4/20

4. Changes to the Friends and Family Test

NHS England has overhauled the friends and family test, the standardised feedback tool used by NHS organisations. Patients will no longer be asked whether they would recommend the service but will be asked instead "Overall, how was your experience of our service?" and asked to select one of six responses. [More...](#)

5. Primary Care Networks: Updated FAQs

These, mentioned in previous bulletins have been updated. Read the latest version [here](#)

6. Understanding Primary Care Networks: context, benefits and risks

This [briefing](#) from the Health Foundation, an independent charity, places primary care networks (PCNs) in the context of previous changes to general practice funding and contracting.

7. Falls and fragility fracture audit programme

The Royal College of Physicians have produced three patient resources on falls and fractures.

- My hip fracture care: 12 questions to ask: Download the [booklet](#) written in clear, plain English, (also available in Welsh) using as little technical jargon as possible, for patients who have fractured their hip, and their families and carers.
- Falls Prevention in Hospital: a guide for Patients, their Families and Carers a [guide](#) providing jargon free information on the care patients can expect to receive in hospital, as well as advice on how to be alert to potential dangers and what to do to avoid them. It sets out a check list of simple measures that, when undertaken, can minimise the risk of falling or tripping.
- Strong Bones after 50: Fracture Liaison Services explained, [a guide and animation](#) providing jargon-free information to patients and carers for supporting older people who have broken a bone following a fall. It also highlights the fact that many of the half million fragility fractures each year are due to undiagnosed osteoporosis

8. The Unsung Hero Awards 2020

The [awards](#) recognise non-clinical staff, teams and **volunteers** who go above and beyond the call of duty for the NHS and recognise the hard work and commitment of people who are vital to our health service but are sometimes overlooked. Colleagues, friends and family can nominate anyone they feel is deserving in one of 11 categories

9. Community pharmacies

Community pharmacies (local pharmacies on the high street) are in a similar position to general practice, with shrinking core income. Pharmacies need to consider new ways to make money. A new contracting deal, due to start from October, patients could be referred to pharmacies by GPs, the NHS 111 service and possibly also by urgent care centres and emergency departments. View the [Podcast: Working with community pharmacy](#)

10. Does your PPG have its member pages' login? They contain **key resources available only to affiliated PPGs**. **If not, visit the website, click on Members and use screen instructions**. We recommend each PPG to have a generic group email address as the username for the login.

11. **Reminder:** *Please email this bulletin to fellow members promptly. All previous bulletins can be found at <http://www.napp.org.uk/ebulletins.html>*

Edith Todd. Membership Administrator

August 2019

A Bitesize Guide to what the General Data Protection Regulation means to Patient Participation Groups

Context:

Planning a meeting or event with patients and the public can ensure that everyone has an opportunity to contribute effectively, getting the best ideas and solutions to improve care for all. Services users often have long term conditions or disabilities that make their insight particularly valuable. However, Protecting the identify of service users is important and PPGs should consider working with their GP Practices to put arrangements in place to ensure that any data held is up to date and is used for the correct purpose.

This document aims to provide PPGs with tips on how to keep personal data secure and GDPR (General Data Protection Regulation) compliant

What is the General Data Protection Regulation:

The EU General Data Protection Regulation, is a new law on data protection and focuses on the use of an individuals' personal data. The new law came into effect in the UK on 25 May 2018.

GDPR aims to give people greater power over their data and make organisations more transparent in how they deal with people's data.

Everyone involved with a PPG must work with GDPR and comply with these new regulations.

Core Principles:

Article 5 of the GDPR sets out the data protection principles that underpin the processing of personal data¹ under the Data Protection Act 2018. These principles

¹ According to the law, **personal data** means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number (e.g. social security number) or one or more factors specific to his physical, physiological, mental, economic, cultural or social identity (e.g. name and first name, date of birth, biometrics data, fingerprints, DNA...)

lie at the heart of the GDPR. They do not provide hard and fast rules, but rather embody the spirit of the general data protection regulation:

1. Lawfulness, fairness and transparency – personal data shall be processed lawfully, fairly and in a transparent manner

This means that all PPG members should work to ensure that personal data which is held or retained e.g. via emails, shared drives, and databases is up to date and GDPR compliant. To remain lawful a PPG must ensure that the information collected on stakeholders will only be used for the purposes to which an individual has consented to. E.g. if an individual's contact details were obtained to receive a newsletter from the PPG, then those contact details cannot be used for a separate mailing campaign unless the appropriate consent has been given.

2. Purpose limitation – personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with said purposes

This means that PPGs should only collect personal data for a specific purpose, clearly state what that purpose is, and only collect data for as long as necessary to complete that purpose.

3. Data minimisation – personal data should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

This means that as a PPG you must only collect information that is needed to achieve a processing purpose. For example, if a PPG is inviting members of the public to attend an event, then you need to collate information such as name, email address, and dietary requirements if food is being made available. You wouldn't need to collect information relating to next of kin, gender or income for example as they wouldn't be relevant. In other words, collect the minimum information possible to get the job done.

Data minimisation has two major benefits. First, in the event of a data breach, the unauthorised individual will only have access to a limited amount of data. Second, data minimisation makes it easier to keep data accurate and up to date.

4. Accuracy – personal data shall be accurate and, where necessary kept up to date;

The accuracy of personal data is integral to data protection. The GDPR states that “every reasonable step must be taken” to erase or rectify data that is inaccurate or incomplete; as individuals have the right to request that inaccurate or incomplete data be erased or rectified within 30 days. For example, if you keep receiving email bounce backs from a particular email address, or if you find a duplicate entry on your contact list, it is imperative to rectify that data to ensure it is accurate and up to date.

5. Storage limitation – personal data shall be kept in a form which permits identification of data subjects for not longer than is necessary for the purposes of which the personal data are processed

In other words, as PPGs you should periodically review any personal data that is being kept and systematically delete records when they are no longer going to be used. For example, following an event you should delete contact details immediately unless information is being kept for a set period for any follow up.

6. Integrity and confidentiality – personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

This is the only principle that deals explicitly with security. The GDPR states that personal data must be “processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures”.

As a PPG it would be advisable to work with your practice in finding a solution so that there is appropriate security of personal data.

Step by step practical tips:

What can my PPG do now to comply with GDPR?

If you're storing personal information about people locally, for example on a spreadsheet, database or in hard copy form, consider what you are collecting, how and where you are storing it and with whom you are sharing it. (Personal information, or data, means anything which can identify an individual).

Special category data

Special category data is personal data which is more sensitive, such as diabetes type, medical information and ethnicity. As a PPG you shouldn't need to collect or store this kind of information, although you may come into contact with it as part of carrying out your role. Remember this information is highly personal and whilst it may be divulged in confidence as part of a conversation, you must not record, store or share it with anyone else.

Emailing

If your role involves communicating with people via email, always ensure that what you are sending is **relevant** and **necessary**.

- **Relevant** - the email only includes content specific to your role. Don't include anything else which isn't relevant to the topic you're discussing as part of your role.
- **Necessary** - the email has a clear purpose and only includes content that will benefit the recipient.

Consider the information you share via email and remember that you shouldn't share the personal data of other people unless you have their express written consent. Sharing minutes of meetings is usually ok and introducing people via email is permissible if you have their written consent. Sharing lists of names and email addresses is not allowed.

When sending emails to groups of people, using the Blind Carbon Copy option (BCC) is usually most appropriate as this prevents sharing of email addresses.

Must do's summary:

- ✓ To remain transparent with your stakeholders / patient population and develop a privacy notice with your practice that clearly states the type of data you collect, what we are collecting it for, and how it will be used.

- ✓ If someone gives you their details (for example to follow up on some information after a meeting or event), only use them for the specific purpose they've given them to you, and dispose of them safely and securely when you're done

- ✓ Think about any data you currently hold and consider whether you still need to store this information. If not, dispose of it or delete it securely. Think about whether the individual concerned would expect that you still have this information. We shouldn't hold on to personal information 'just in case'

- ✓ Finally, remember that any personal information you hold must be stored securely (password protected if in electronic format, or locked away if in paper form).

Want to learn more?

- For more information on GDPR visit the Information Commissioners Office via the following link <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

- NHS England's Involvement hub contains a range of resources, guides, case studies and toolkits about participation