

General Practice Privacy Notice

The information we hold on you

Our practice keeps data on you, relating to who you are, where you live, contact details, what you do, your family, possibly your friends, your employers, your habits, your problems and diagnoses, the reasons you seek help, your appointments, if you have a Carer, where you are seen and when you are seen, who by, referrals to specialists and other healthcare providers, tests carried out here and in other places, investigations and scans, treatments and outcomes of treatments, your treatment history, the observations and opinions of other healthcare workers, within and without the NHS as well as comments and aide memoires reasonably made by healthcare professionals in this practice who are appropriately involved in your health care.

When registering for NHS care, all patients who receive NHS care are registered on a national database, the database is held by NHS Digital, a national organisation which has legal responsibilities to collect NHS data.

Identifying patients who might be at risk of certain diseases

- 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.

If you would like more information, please speak with the practice manager.

Who we share information with.

As GPs, we cannot provide all your treatment ourselves, so we need to delegate this responsibility to others with other organisations.

If your care requires treatment outside the practice, we will exchange with those providing such care and treatment whatever information may be necessary to provide you with safe and high quality care.

Once you have seen the care provider, they will normally send us details of the care they have provided you with, so that we can understand your health better.

The sharing of personal data, within the practice and with those other organisations involving the practice, such as Primary Care Networks (PCNs) as well as secondary care organisations and social prescribing organisations is assumed and is allowed by law (including the Data Protection Act 2018). However, we will gladly discuss this with you in more detail if you would like to know more. We keep a register of our Information Assets which also sets out a Record of Processing Activity. The majority of patient data processing and storage happens via our EMIS and EMIS Community clinical systems. Your consent to this sharing of data, within the practice and with those others outside the practice is assumed and is allowed by the Law, however we will gladly discuss this with you in more detail if you would like to know more.

We have an overriding responsibility to do what is in your best interests under the 2018 Data Protection Act 'in performance of a public task' (see legal bases in the summary below). The Practice team (clinicians, administration and reception staff) only access the information they need to allow them to perform their function and fulfil their roles. A list of the types of organisation we share with

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is provided below. This summary also contains details of your rights in relation to your data under the Act and how to exercise them.

This practice does NOT share your data with insurance companies, except by your specific instruction or consent.

Your data is NOT shared or sold for any marketing purpose.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following 9 subsections.

Data Controller	Pickhurst Surgery
Data Protection Officer	Danielle Gibbons, GP Data Protection Officer gpdpo@selondonics.nhs.uk
Purpose of Processing your personal information	Direct Care delivered to the individual alone, much of which is provided in the surgery. After a patient agrees to a referral for direct care elsewhere, such as a referral to a specialist in a hospital, necessary and relevant information about the patient, their circumstances and their problem will need to be shared with the other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare and social care professionals to provide the most appropriate advice, investigations, treatments, therapies and or care.
Lawful Basis for Processing your personal information	The legal basis will be:- Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’; and Article 9(2)(h) ‘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...’ Healthcare staff will also respect and comply with their obligations under the common law duty of confidence.
Recipient or categories of recipients of your personal data	The data will be shared with NHS Digital according to directions which can be found at https://digital.nhs.uk/article/8059/NHS-England-Directions- Please also see issued Data Provision Notices: https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/directions-and-data-provision-notice/data-provision-notice-dpns

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

- Ambulance Trusts
- Bromley Urgent Care
- Education Services
- Care co-ordinators
- Clinical Excellence Group
- Clinical Commissioning Groups
- Community Pharmacists
- District Nurses
- Fire and Rescue Services
- Healthy.io
- Independent Contractors such as dentists, opticians, pharmacists
- Local Authorities
- Local GP provider organisation
- London Coroner's Service
- London Integrated Care Systems
- NHS Commissioning Support Units
- NHS Trusts / Foundation Trusts/ specialist Trusts
- Police & Judicial Services
- Primary Care Network
- Private Sector Providers
- Social Prescribers
- Social Care Services Health and Social Care Information Centre (HSCIC)
- South East London Integrated Care
- Substance Misuse Remote Workers
- The Child Health Information Service
- Voluntary Sector Providers
- Wellbeing coaches

Many organisations across London share an aggregated summary view of your data, held in a secure Health Information Exchange and using a Local Health Care Exemplar format known as the One London patient record, in order to make quicker and better informed decisions in providing you with care.

This practice is also part of a Neighbourhood Multi-Disciplinary Team designed to bring together a number of service providers to help patients with more than one need.

You have the right to object to information being shared for your own care. Please write to the DPO.

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. These companies are bound by

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	contractual agreements to ensure information is kept confidential and secure.
Your right to object	<p>You have the right to object to information being shared between those who are providing you with direct care.</p> <ul style="list-style-type: none"> • This may affect the care you receive – please speak to the practice. • You are not able to object to your name, address and other demographic information being sent to NHS Digital. • This is necessary if you wish to be registered to receive NHS care. • You are not able to object when information is legitimately shared for safeguarding reasons. • In appropriate circumstances it is a legal and professional requirement to share information for safeguarding reasons. This is to protect people from harm.
Your right to access and correction	<p>You have the right to access the data that is being shared and have any inaccuracies corrected.</p> <p>There is no right to have accurate medical records deleted except when ordered by a court of Law.</p>
Retention period	<p>We retain your personal data in line with both national guidance and law, which can be found here:</p> <p>https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</p>
Your right to complain	<p>Use of personal data is overseen by the Information Commissioners Office, often known as the ICO.</p> <p>You have to complain or raise concerns with the ICO and they can be contacted via their website:</p> <p>https://ico.org.uk/global/contact-us/</p> <p>Or you can also call their helpline</p> <p>Tel: 0303 123 1113 (local rate) 01625 545 745 (national rate)</p>