

# General Practice Privacy Notice

Updated: 16<sup>th</sup> May 2018

## 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 handle all your information ourselves, so we need to delegate this responsibility to others within the practice and sometimes 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 safe, 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.

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.

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.

You have the right to object to our sharing your data in these circumstances but we have an overriding responsibility to do what is in your best interests.

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

<b>Data Controller</b>	Dr Sudesh Mittal
<b>Data Protection Officer</b>	Benedic Taguba III
<b>Purpose of Processing your personal information</b>	<p>Direct Care is care delivered to the individual alone, most of which is provided in the surgery.</p> <p>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.</p> <p>The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p> <p>The practice performs computerised searches of some or all of our records to identify individuals who may be at increased risk of certain conditions or diagnoses i.e. Diabetes, heart disease, risk of falling). Your records may be amongst those searched. This is often called “risk stratification”. These searches are sometimes carried out by Data Processors who link our records to other records that they access, such as hospital attendance records. The results of these searches and assessment may then be shared with other healthcare workers, such as specialist, therapists, technicians etc. The information that is shared is to enable the other healthcare workers to provide the most appropriate advice, investigations, treatments, therapies and or care.</p>
<b>Lawful Basis for Processing your personal information</b>	<p>The processing of personal data in the delivery of direct care and for providers’ administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR:</p> <p>Article 6(1)(e) ‘...necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’.</p> <p>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...’</p>
<b>Recipient or categories of recipients of your personal data</b>	<p>The data will be shared with health and care professionals and support staff in this surgery and at hospitals, diagnostic and treatment centres who contribute to your personal care.</p> <p>In addition, personal data may be shared which is sent to or may be</p>

	<p>received from providers such as our 8to8 hubs (who provide some evening and weekend appointments on behalf of the practice), 111, out of hours services, local social services and care services, or other services the Wandsworth clinical commissioning group has commissioned.</p> <p>In all cases, we ensure the data is supplied is appropriate and within the law.</p>
<p><b>Your right to object</b></p>	<p>You have the right to object to some or all the information being processed, which is detailed under Article 21.</p> <p>Please contact the Data Controller or the practice manager.</p> <p>You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.</p>
<p><b>Your right to access and correction</b></p>	<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>
<p><b>How long do we hold your personal data for?</b></p>	<p>We retain your personal data in line with both national guidance and law, which can be found here:</p> <p><a href="https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016">https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016</a></p>
<p><b>Your right to complain</b></p>	<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><a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a></p> <p>Or you can also call their helpline</p> <p>Tel: 0303 123 1113 (local rate) 01625 545 745 (national rate)</p>