

## Privacy Notice

Version:	Review date:	Edited by:	Approved by:	Comments:
1.0	15.03.2024	Bhoomi Furia	Charmi Rami	

**This privacy notice should not be confused with the privacy policy.**

This page describes how Crumpsall Medical Practice uses and manages the information it holds about you, including:

- how the information may be shared with other NHS organizations and non-NHS organisations; and
- how the confidentiality of your information is maintained.

You can contact us via the details below if you have any questions or concerns about how we use your information.

### Information Management in relation to Covid19

In the unfortunate event that you contract Covid 19, as a notifiable disease, minimal information about you will be shared with Public Health England for the purposes of containment and management. This information is shared in compliance with the law and shared on a need to know basis.

During the Coronavirus outbreak, the NHS has granted additional powers for health organisations to share information to help monitor COVID-19; a summary from the Secretary of State for Health & Social Care is below:

The Secretary of State for Health and Social Care has Directed NHS Digital to collect and analyse data from providers and other organisations involved in managing the COVID-19 response and then disseminate information and analysis to other bodies for the purpose of planning and managing the response. NHS England and NHS Improvement have been given legal notice to support the processing and sharing of information to help the COVID-19 response under Health Service Control of Patient Information Regulations 2002.

Who we are:

Crumpsall Medical Practice is a partnership, focused solely on delivering improved community NHS services in Manchester and enabling people to live independent and fulfilling lives for as long as possible.

We are an NHS partnership formed by the three local Foundation Trusts which serve Great Manchester:

- Central Manchester University Hospitals NHS Foundation Trust (Acute)
- Greater Manchester West Mental Health NHS Foundation Trust (Mental Health)
- Manchester Mental Health and Social Care NHS Trust (Mental Health)
- Pennine Acute Hospitals NHS Trust (Acute)
- Pennine Care NHS Foundation Trust (Mental Health)
- Salford Royal NHS Foundation Trust (Acute)
- The Christie NHS Foundation Trust (Specialist)

Crumpsall Medical Practice can be contacted at the following address:

Email – [nmccg.jolly@nhs.net](mailto:nmccg.jolly@nhs.net)

Postal address:

Crumpsall Vale Intermediate Care Unit,  
Delaunays Road,  
Manchester,  
M8 5RB

### **Commitment to Data Privacy and Confidentiality**

We are committed to protecting your privacy and will only process personal confidential data in accordance with the relevant data protection legislation, currently the UK General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA) and Access to Health Records Act 1990 (covering records of deceased patients), alongside the common law duty of confidentiality.

Crumpsall Medical Practice is registered as a Data Controller with the Information Commissioner's Office (ICO). Our registration number on the Data Protection Register is ZA190147 and our entry may be found by reference to the ICO website at the following <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

All information that we hold about you will be held securely and confidentially.

We use administrative and technical controls to do this including strict procedures and encryption. We use strict controls to ensure that only authorised staff can see information that identifies you. This means only a limited number of authorised staff have access to information that identifies you where it is appropriate to their role and is strictly on a need to know basis.

All our staff, contractors, and committee members receive appropriate and on-going training to ensure they are aware of their personal responsibilities. Our staff have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures.

We will only use the minimum amount of information necessary about you.

We will only keep information in accordance with the schedules set out in the Records Management Code of Practice 2021.

### **Purposes of Processing**

Crumpsall Medical Practice is responsible for provision of health services across the Manchester. Crumpsall Medical Practice processes personal data for a range of purposes to enable it to meet its statutory duties and functions including:

The provision of healthcare services for the population of Greater Manchester

- safeguarding children and vulnerable adults
- service planning
- to meet a legal obligation such as where a formal court order has been served on us
- where we are lawfully required to report certain information to appropriate authorities, such as to prevent fraud or a serious crime.

## Lawful basis for processing

Current Data Protection legislation provides six possible legal bases available for a datacontroller to use in justifying processing of personal data:

- consent of the data subject
- contract
- public task
- legal obligation
- vital interests
- legitimate interests

In general, Crumpsall Medical Practice will only rely on consent where it is clearly necessary in law. Where we have a legal basis for sharing and using data without consent, we will do so.

Details of the legal basis relied upon for processing are shown in the table of uses of information below.

## Where do we receive information from?

Crumpsall Medical Practice receives information about our patients from a range of different sources, some of which could fall outside of the provision of direct care, some examples have been listed below:

- if you have been referred to WHC for the provision of care from a different organisation or care provider
- if you have referred yourself to one of our services
- if you have made a complaint to us about healthcare that you have received, and we need to investigate.
- if you are using our Patient Advice and Liaison Service (PALS)
- if you ask us to keep you regularly informed and up to date about the work of WHC
- if you are actively involved in our engagement activities or service user groups

### **Why is your health record shared and with whom?**

We share your information with a range of organisations or specific named individuals for a variety of lawful purposes, including:

- GPs and other NHS staff for the purposes of providing direct care and treatment to the patient, including administration.
- social workers or to other non-NHS staff involved in providing healthcare and safeguarding purposes;
- specialist organisations for the purposes of clinical auditing;
- those with parental responsibility for patients, including guardians;
- carers without parental responsibility (subject to explicit consent);
- medical researchers for research purposes (with your explicit consent, unless the data is anonymous);
- NHS managers and the Department of Health for the purposes of planning, commissioning, managing and auditing healthcare services;
- organisations with statutory investigative powers - e.g. the Care Quality Commission, the GMC, the Audit Commission, the Health Service Ombudsman;
- national generic registries - e.g. the UK Association of Cancer Registries (you may opt out of being registered if you wish)
- where necessary and appropriate, to non-statutory investigations - e.g. Members of Parliament;
- where necessary and appropriate, to government departments other than the Department of Health;
- Solicitors, to the police, to the Courts (including a Coroner's Court), and to tribunals and enquiries;
- the media (normally the minimum necessary disclosure subject to explicit consent)

The specifics of this sharing are detailed in the tables found at the end of this privacy notice. Categories of personal confidential data

The types of information that we may collect and use include the following:

- Personal data – means any information relating to an identified or identifiable natural person (data subject)
  
- Sensitive personal data – means any information relating to an identified or identifiable natural person which is more sensitive and so needs more protection, such as:
  - Race
  - ethnic origin
  - political views
  - religion
  - trades union membership
  - genetics
  - biometrics (where used for ID purposes)
  - health
  - sex life
  - sexual orientation
  
- Confidential Information – means both information ‘given in confidence’ and ‘that which is owed a duty of confidence’. This also includes and is adapted to include special category data as defined in current data protection legislation.

Personal confidential data may include your name, your address, postcode, date of birth, NHS number, information about appointments and clinic visits, reports and notes about your health, treatment and care, relevant information about people who care for you such as next of kin and other health professionals.

## **Pseudonymised Information**

This is data that has undergone a technical process that replaces your identifiable information such as NHS number, postcode, date of birth with a unique identifier, which obscures the 'real world' identity of the individual patient to those working with the data.

## **Anonymised Information**

This is data rendered into a form which does not identify individuals and where there is little or no risk of identification.

## **Rights of Individuals**

You have certain legal rights, including a right to have your information processed fairly and lawfully. These rights are:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling

You have the right to privacy and to expect the NHS to keep your information confidential and secure.

## **National Data Opt-out**

You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. Any individual has the right to register for a national data opt-out, to make such a request, please follow the link to the NHS Digital website:

<https://digital.nhs.uk/services/national-data-opt-out>

Crumpsall Medical Practice meets the requirements of the National Data Opt Out. If you have any questions or concerns about your data protection rights or would like a copy of the Crumpsall Medical Practice National Data Opt Out compliance checklist contact

nmccg.jolly@nhs.net

These are commitments set out in the NHS Constitution, for further information please visit the <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

## **Subject access requests**

Individuals can find out if we hold any personal information by making a subject access request under the Data Protection legislation. If we do hold information about you, we will:

- confirm that we are processing your personal data
- provide a copy of your personal information
- provide additional information such as: the reason why we hold your information, who we may have shared information with, how long we hold information

The Data Protection Act gives you the right to obtain a copy of information that WHC holds about you and why.

If you would like to receive a copy of information we hold about you, your request should be made in writing by post or email to:

- Records Department, Crumpsall Medical Practice, Crumpsall Vale Intermediate Care Unit, Delaunays Road, Manchester, M8 5RB
- Email: nmccg.jolly@nhs.net

When making a request, please include the following details:

- Your name, address and postcode
- Any relevant case numbers
- The type of information or documents you want to receive copies of including any relevant dates.
- Any preferences you have for the way you would like us to send the information to you (for example, hard copy, and large print or by email)



- forms of identification – passport, driving license or birth certificate, plus confirmation of home address, such as a recent utility bill, council tax bill or letter from a government department

If you are making a request for records in relation to another person or a deceased individual, you will be required to provide evidence of the authority which enables you to act on that individuals' behalf, this may include:

- Documented consent of the individual
- Lasting Power of Attorney
- Grant of Probate

### **Confidentiality advice and support**

A Caldicott Guardian is a senior person responsible for protecting the confidentiality of service users and their information, as well as enabling appropriate and lawful information-sharing.

If you have any concerns or need advice about data protection or confidentiality Please contact us on [nmmcg.jolly@nhs.net](mailto:nmmcg.jolly@nhs.net) or [Charmi.rami@nhs.net](mailto:Charmi.rami@nhs.net)

### **Overseas transfers**

Your information will not be sent outside of the United Kingdom where the laws do not protect your privacy to the same extent as the law in the UK unless we are satisfied that equivalent arrangements exist to provide the same level of security as would otherwise be found in the UK. We will never sell any information about you.

### **Concerns and complaints**

Patients who have a concern about any aspect of their care or treatment provided by Crumpsall Medical Practice, or about the way their records have been managed, should contact the Patient.

Advice and Liaison Service (PALS):  
Telephone: 0300 123 7797

Additionally, patients have the right to complain to the Information Commissioner if they should ever be dissatisfied with the way Crumpsall Medical Practice has handled or shared their personal information:

The Information Commissioner's Office (ICO) Tel:  
0303 123 1113 / <http://www.ico.org.uk> Further  
information

You can find further information about how the NHS uses personal confidential data and your rights in:

- The NHS Care Record Guarantee
- The NHS Constitution
- Please visit the NHS Digital's website for further information about their work. The Guide to Confidentiality provides a useful overview of the subject.
- The Information Commissioner's Office is the Regulator for Data Protection Legislation.
- The NHS Health Research Authority (HRA) protects and promotes the interests of patients and the public in health and social care research.