

UK GDPR Privacy Notice

Privacy Notice

The Poplars Medical Centre fully appreciates the importance of protecting and managing your data and maintaining your privacy. To ensure that we comply with these requirements all our data management and clinical processes fully recognise the data protection law in force in the UK (e.g. the Data Protection Act 2018, the Data Protection Act 2018 includes relevant Articles from the EU General Data Protection Regulation (UK GDPR))

Please read the following information carefully to understand how we process your personal data.

For the purpose of the Data Protection Laws, the Data Controller is
The Poplars Medical Centre whose address is 202 Partington Lane, Swinton, Manchester, M27 0NA

When we refer to 'we', 'us' and 'our', we mean The Poplars Medical Centre

Use of Your Personal Information

This privacy notice explains why we collect information about you and how that information may be used.

Our health care professionals who provide you with our services maintain records about your health and any treatment or care you have received previously. These records help to provide our clients with the best possible healthcare.

Your records may exist in several formats including electronic, paper or a mixture of both, and we deploy many working organisations and approaches to ensure that such information is maintained within a confidential and secure environment. The records which we could hold about you may include the following information: -

- Personal details relating to you, including your address and contact details, carer, legal representative, and parents' emergency contact details
- Any contact we have had or intend to have with you such as appointments, clinic or surgery visits, home visits, etc.
- Notes and reports about your health which is deemed to be of a sensitive nature
- Details about your referral, diagnostics procedures, treatment, and care
- Results of any additional relevant investigations
- Relevant information from other health professionals, relatives or those who care for you

To ensure you receive the highest levels of care, your records will be used to facilitate the care that we provide. Anonymised information held about you could, on occasions, be used to help protect the health and wellbeing of the general public and to help us manage our contracts with commissioners. Information could also be used within our organisation for the purposes of clinical audits which in turn will provide monitoring of the quality of the services we provide.

Some of this information will be used for statistical purposes and we will ensure that individuals cannot be identified. For situations where we may contribute to research projects, we will always gain your explicit consent before releasing any relevant information.

Legal basis for Processing

Our ability to process your personal and healthcare data is covered by UK GDPR article 6 and for the processing of personal sensitive data by Article 9(2)h which indicates that processing of data 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.

Maintaining the Confidentiality of Your Records

We will take all possible care to protect your privacy and will only use information collected with the law including: -

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- Data Protection Act 2018 including UK GDPR
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012 (if appropriate)
- Codes of Confidentiality, Information Security and Records Management

Our staff are all trained and briefed in data protection principles and understand they have a legal obligation to keep information about you confidential. They also understand that information about you will only be shared with other parties if there is an agreed need to do so or a legal reason. We will only share your data without your permission if there are very exceptional circumstances (i.e., life or death situations), where the law requires information to be passed on and / or in accordance with the Caldicott Principle 7 e.g., to share or not to share. This means that health and social care professionals should have the confidence to share information in the best interests of their patients within the framework set out by the Caldicott Principles. Whilst the Caldicott Principles were originally developed for NHS purposes, we have adopted the underlying principles to align with best practice.

All personal information that we manage is stored within the UK within a secure environment and we always use suitably protected methods and systems to transfer your personal information.

Partner Organisations

It may be possible that we will share your information with other organisations, if this is required, we will apply very strong controls. The current organisations who we share data with includes: -

- NHS Trusts / Specialist Trusts
- Independent Contractors such as dentists, opticians, pharmacists
- Private Sector Providers
- Voluntary Sector Providers
- Ambulance Trusts
- GM Integrated Care
- NHS England
- GP Federations and Alliances
- Primary Care Networks
- NHS Digital
- National Institute for Health and Care Excellence
- Care Quality Commission
- NHS Improvement
- NHS Shared Business Services
- Social Care Services
- Local Authorities
- Education Services
- Fire and Rescue Services
- Police
- Other 'Data Processors'

It is noted that the above list is not exhaustive, and we may contract with other external organisations to undertake processing of your personal information. These 3rd party organisations will abide with our stringent contractual conditions regarding the protection of personal data.

In some cases, you will be requested to provide positive consent if we intend to share your personal details with other organisations.

Extended Access – we provide extended access services to our patients which means you can access medical services outside of our normal working hours. To provide you with this service, we have formal arrangements in place with GM Integrated Care and with other practices whereby certain key “hub” practices offer this service on our behalf for you as a patient to access outside of our opening hours. This means, those key “hub” practices will have to have access to your medical record to be able to

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offer you the service. Please note we ensure that those practices comply with the Law and protect the use of your information, we have very robust data sharing agreements and other clear arrangements in place to ensure your data is always protected and used for those purposes only.

Primary Care Network. We are a member of Swinton Primary Care Network (PCN). This means we will be working closely with several other Practices and health and care organisations to provide healthcare services to you. These Practices are listed at the end of this Privacy Notice. See below.

During the course of our work we may share your information with these Practices and other health care organisations/professionals. We will only share this information where it relates to your direct health care needs.

When we do this, we will always ensure that appropriate agreements are in place to protect your information and keep it safe and secure. This is also what the Law requires us to do. If you would like to see the information the PCN holds about you, please contact Zain Harper on zain.harper@nhs.net . See also your rights listed below.

Access to Personal Information and Your Rights

You have a right under the Data Protection Act 2018, to request access to view or to obtain a copy of what information the organisation holds about you and to have it modified should it be inaccurate. The process to access your records is known as a Subject Access Request (SAR) and the way it works is outlined below: -

- Your SARs request must be made in writing to the organisation's Caldicott Guardian at the address shown above
- The latest regulations state that there is no charge to have a printed copy of your information provided
- The request will be reviewed and if possible, completed within one month (subject to our possible requests for further clarification for you)
- You will need to provide adequate proof of your identity before we will release the requested details (e.g., full name, address, date of birth, NHS number and details of your request), you must also provide two forms of identification

In addition to the right of access, under the Data Protection Act 2018, you will also have the following rights: -

- Erasure, which is the right to request that your personal data is removed from our systems be they paper or electronic – please note that under certain circumstances we are legally obliged to maintain a copy of your data for contractual and or statutory reasons
- Restriction of processing, this is the right for you to request that we only process certain parts of your data
- Objection – you have the right to object to the way that we are processing your data
- Data portability – this concerns the right to request that we provide a copy of your data in an easily transportable format.
- Automatic processing – you have the right to object to the way we automatically process data – in the case of our organisation we do not, at present, carry out automatic processing of your data
- If you have provided us with your consent to process your data for the purpose of providing our services (other than for direct healthcare), you have the right to withdraw this at any time. To do this should contact us by emailing or writing to the organisation.

Online Access

We are currently working towards offering all existing patients' on-line access to their medical records. All new patients will automatically be given on-line access to their records.

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Please note that online access will also provide access to all relevant correspondence attached to your record. It is your responsibility to make sure that you keep your information safe and secure if you do not wish any third party to gain access.

Your Summary Care Record

Your summary care record ('SCR') is an electronic record of your healthcare history (and other relevant personal information) held on a national healthcare records database provided and facilitated by NHS England.

You can ask your doctor to add further information to your SCR from your medical notes. This can include health problems such as diabetes and your treatment preferences.

This record may be shared with other healthcare professionals and additions to this record may also be made by relevant healthcare professionals and organisations involved in your direct healthcare.

You may have the right to demand that this record is not shared with anyone who is not involved in the provision of your direct healthcare. SCRs improve care, but if you do not want to have a SCR, then you are entitled to opt out. You can tell your GP, or you can fill out a SCR opt out form. If you would like a form or wish to enquire further as to your rights in respect of not sharing information contained within this record, then please contact our Data Protection Officer.

If you are happy with the use of this information you do not need to do anything. You may however change your mind at any time.

National Data Opt-out

The national data opt-out was introduced on 25 May 2018, enabling patients to Opt-out from the use of their data for research or planning purposes, in line with the recommendations of the National Data Guardian in her Review of Data Security, Consent and Opt-outs.

If you wish to opt-out as part of this process, please contact the practice and we will take the necessary action to add you name to the Opt-out list

Retention of your data

Your data will be retained for no longer than is necessary and in accordance with our Documentation Management Lifecycle Policy and the associated Schedule of Retention

Withdrawal of Consent

If you have provided us with consent to process your data for the purpose of providing our services (other than direct care), you have the right to withdraw this at any time. To do this you should contact us in writing

Cookies

This website makes use of cookies to optimise user experience. By using our website, you consent to all cookies in accordance with our [Cookie Policy](#).

Updating Personal Details

If any of your details e.g., your name, address or other personal data have changed or are incorrect you have a responsibility to inform the professional treating you who will arrange for the necessary updates to be made. This will help us to ensure that the data we hold about you is accurate and complete.

Mobile Numbers & Email Addresses

If you provide us with your mobile phone number, we may use this to send you reminders about your appointments or other health screening information. Please let us know if you do not wish to receive reminders on your mobile. If you provide us with your email address, we may use this to send you reminders to make an appointment for a review. Please let us know if you do not wish to receive correspondence by email.

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CCTV

Please note that we have installed a CCTV system in the main waiting room and around the perimeter of the building for the safety of our patients/staff and in particular to record and evidence any serious incidents involving patients. We operate this system in accordance with the Law and the codes of practice issued by the Information Commissioners Office as well as other regulatory bodies. Our CCTV is monitored on a daily and only authorised staff will have access to it.

We will not keep images captured on CCTV for longer than is necessary.

[NOTE: You will also need to state the following information here:

- a) CCTV recordings are kept for 4 weeks
- b) They are kept in a secure room
- c) Only authorised personnel will view them and that they are viewed in a secure environment
- d) The recordings are overwritten every 4 weeks.

If you believe your image has been captured on our CCTV you have a right to request to see it. Please contact our Data Protection Officer, who will be able to assist with your enquiry.

We will always inform you if we record or monitor any telephone call you make to us.

Notification

The Data Protection Act 2018 requires organisations that control data to register with the Information Commissioners Office (ICO) website www.ico.org.uk

The organisation is registered with the ICO as a Data Controller under the Data Protection Act 2018. The registration number is Z6537111 and can be viewed online in the public register at <http://www.ico.gov.uk/>

Complaints

Should you have any concerns about how your information is managed by the Organisation please contact us at: -

The Poplars Medical Centre
202 Partington Lane, Swinton, Manchester, M27 0NA

If you are still unhappy following a review by the Organisation you can then complain to the Information Commissioners Office (ICO) via their website www.ico.org.uk or in writing to: -

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

If you are happy for your data to be extracted and used for the purposes described in this Privacy Notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact us.

We are a member of the Swinton Primary Care Network

The list of Practices included are:

The Lakes Medical Centre
The Sides Medical Centre
Silverdale Practice

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