**UNIVERSITY OF WARWICK HEALTH CENTRE**

**PRIVACY NOTICE**

**Introduction**

This privacy notice explains who we are, why information is collected about you, the different ways in which this information may be used, who it is shared with and how we keep it safe. It also explains how the practice uses the information we hold about you, how you go about accessing this information if you wish to see it and to have any inaccuracies corrected or erased.

**Who we are**

We are a University practice situated in the heart of the campus serving the Students and Staff (plus their families) who live on campus or within the catchment area.

Our staff team of General Practitioners and Nurses provides primary medical care services to our practice population of 21,000 patients and our administrative and managerial staff support the team in providing care for patients.

**WHAT INFORMATION DO WE COLLECT FROM YOU?**

GP Records are stored electronically and on paper and include personal details about you such as your address, carers, legal representatives, emergency contact details, as well as:

* Any contact the surgery has had with you, such as appointments, clinic visits, emergency appointments and telephone calls
* Notes and reports about your health
* Details about your treatment and care
* Details about any medication you are taking
* Results of investigations such as laboratory tests, x-rays
* Relevant information from other health professionals, relatives or those who care for you

**WHY DO WE COLLECT THIS INFORMATION?**

Your records are used to ensure you receive the best possible care from our nurses and doctors. It enables the staff to see previous treatments, medications and enables them to make informed decisions about future decisions about your care. It helps the doctors to see lists of previous treatments and any special considerations which need to be taken into account when care is provided.

Important information is also collected to help us to remind you about specific treatment which you might need, such as health checks, or reminders for screening appointments such as cytology reminders.

Information held about you may be used to help protect the health of the public and to help us to improve NHS services. Information may be used within the GP practice for clinical audit to monitor the quality of the service provided.

Staff at the practice use your information to help deliver more effective treatment to you and to help us to provide you with proactive advice and guidance.

**Who MIGHT WE share your information with?**

There are a number of ways information collected about you is shared, which includes:

1. **Patient referrals**

With your agreement, your GP or Nurse may refer you to other services and healthcare providers not provided by the practice, or they may work with other services to provide your care in the practice. Once you have been seen for your referral, the other health care provider will normally tell us about the treatment they have provided for you and any follow up which the GPs need to provide. This information is then included in your GP record.

1. **Local Hospital, Community or Social Care Services**

Sometimes the clinicians caring for you need to share some of your information with others who are also supporting you. This could include hospital or community based specialists, nurses, health visitors, therapists or social care services.

1. **Summary Care Record (SCR)**

A Summary Care Record is an electronic record of important patient information, created from the GP medical records. It contains information about medication you are taking, any allergies you suffer from and any bad reactions to medications you have previously had. It can be seen and used by authorised staff in other areas of the health and care system involved in your direct care. Giving healthcare staff access to this information can prevent mistakes being made when caring for you in an emergency or when your GP practice is closed. Your Summary Care Record also includes your name, address, date of birth and your unique NHS Number to help identify you correctly. If you and your GP decide to include more information it can be added to the Summary Care Record, but only with your express permission. For more information visit <https://digital.nhs.uk/summary-care-records/patients>

1. **Castle Register (Care and Support Towards Life’s End)**

The Castle Register is Coventry and Warwickshire’s electronic palliative care coordination system (EPaCCS). In Coventry and Warwickshire health and social care professionals are working together to improve the care of patients coming to the end of their lives who consent to share their clinical information. The information can then be shared securely across the care settings of community, hospital and hospice and is visible in hours and out of hours to professionals trained to use it. Trained staff working across all care settings may upload/update information about the patients care so that it can be accessed by key clinicians, including in an emergency, e.g. Primary/secondary

care and the Ambulance service. The patient or their family as appropriate will need to provide consent to their GP for the castle register record to be commenced.

1. **National Services**

There are some national services like the National Cancer Screening Programme that collect and keep information from across the NHS. This is how the NHS knows when to contact you about services like cervical, breast or bowel cancer screening. Often you have the right to not allow these organisations to have your information.

You can find out more about how the NHS holds and shares your information for national programmes on the [NHS Choices website.](http://www.nhs.uk/NHSEngland/thenhs/records/healthrecords/Pages/overview.aspx)

1. **Other NHS organisations**

Sometimes the practice shares information with other organisations that do not directly treat you, for example, Clinical Commissioning Groups. Normally, it will not be possible to identify you from this information. This information is used to plan and improve services. The information collected includes data such as the area where a patient lives, age, gender, ethnicity, language preference, country of birth and religion. The CCG also collects information about whether patients have long term conditions such as diabetes; blood pressure, cholesterol levels and medication. However, this information is anonymous and does not include anything written as notes by the GP and cannot be linked to you.

1. **Local Data Sharing Agreements**

 The practice currently has a data sharing agreement to support our patients across Coventry and

 Warwickshire. The agreement is:

1. Coventry and Rugby GP Alliance – This agreement allows patients from the surgery to be seen and treated by GPs and Nurses in the evenings and weekends if they prefer. The agreement allows a GP or nurse across sites within Coventry and Rugby to access the patient record securely and allows information about the consultation to be written into the patient record. The Coventry sites are currently in Longford Medical Centre, Moseley Avenue surgery, Quinton Park Medical centre, Stoke Aldermoor Medical Centre, Broad Street Surgery, Tile Hill Surgery, Wood End Health Centre and in Rugby at Rugby Health and Well Being Centre.

**What do we do with your information?**

The healthcare professionals who provide your care maintain records about your health.  This is a record of your care history and allows health care professionals to review your care to help inform future decisions about your treatment. Sharing this information helps to improve the treatment you receive, such as a hospital consultant writing to your GP.   We follow strict data sharing guidelines to keep your information safe and secure.

**HOW LONG DO WE KEEP YOUR INFORMATION?**

Health and social care records are subject to a nationally agreed code of practice which regulates the minimum period for which records must be kept. This specifies that GP record should be retained until 10 years after the patient’s death or after the patient has permanently left the country, unless they remain in the European Union. Electronic patient records must not be destroyed or deleted for the foreseeable future. For more information, see the records management code of practice: <https://digital.nhs.uk/article/1202/Records-Management-Code-of-Practice-for-Health-and-Social-Care-2016>

**How do we keep your information safe?**

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential. We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

* General Data Protection Regulation 2017
* Data Protection Act 1998
* Human Rights Act 1998
* Common Law Duty of Confidentiality
* Health and Social Care Act 2012
* NHS Codes of Confidentiality, Information Security and Records Management
* Information: To Share or Not to Share Review

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances such as a life or death situation, or where the law requires information to be passed, or where it is in the best interest of the patient to share the information.

In May 2018, a new national regulation called the General Data Protection Regulation will come into force and the practice has a legal responsibility to ensure that we will also comply with these regulations.

University of Warwick Health Centre use the Emis Web software system to record and store patient data within its patient records.

EMIS’ on-going commitment to business continuity and to providing the highest level of service to its customers, means that they will be making changes to the way they store data in EMIS Web.

With effect from 10th June 2019, EMIS will start storing our practice’s EMIS Web data in a highly secure, third party cloud hosted environment, namely Amazon Web Services (“AWS”). The data will remain in the UK at all times and will be fully encrypted both in transit and at rest. In doing this, there will be no change to the control of access to your data and the hosted service provider will not have any access to the decryption keys. AWS is one of the world’s largest cloud companies, already supporting numerous public sector clients (including the NHS), and it offers the very highest levels of security and support.

**YOUR INDIVIDUAL RIGHTS under the GDPR Legislation**

* The right to be informed
* The right of access
* The right to rectification
* The right to have your information erased
* The right to restrict processing
* The right to data portability
* The right to object and
* The right not to be subject to automated decision making including profiling

The practice does not engage in any direct marketing, profiling or use any automated decision making tools.

1. **HOW CAN I ACCESS THE INFORMATION YOU HOLD ABOUT ME?**

You have a right under the Data Protection legislation to request access to obtain copies of all the information the surgery holds about you. You are also allowed to have information amended should it be inaccurate.

In order to access your medical record, you need to let the practice know by making a Subject Access Request (SAR). The new GDPR (General Data Protection Legislation) which comes into force from 25th May 2018 sets the age when a child can give their own consent to this processing request at age 16. If the child is younger then the consent of a person with parental responsibility will be required.

The practice will respond to your request within one month of receipt of your request. You will need to give adequate information (for example full name, address, date of birth, NHS number and details of your request) so that your identity can be verified and your records located.

It will be very helpful to the practice if you could specify any particular information you need so we can provide the information to you as soon as possible. We have designed a form for patients to help them to identify the information they require and completing this form will help us process this information efficiently.

Usually there is no charge to see the information that the practice holds about you unless the request is excessive, repetitive or complicated.

For information about your hospital medical records, you should write direct to them.

1. **HAVE INACCURACIES CORRECTED OR ERASED**

If you feel that the personal data that the practice holds about you is inaccurate or incomplete then please let us know and we will update your records within one month of notification. If this incorrect information has been sent onwards, we will also inform any other organisations of this. If it is not possible to correct the information then we will write to you to let you know the reason behind the decision and inform you how you can complain about this.

If you feel information in your health record should not be there, you can ask the practice to erasure that information. We will look at each request specifically. Please bear in mind there may well be legal reasons why we will need to keep data even if you request it to be erased. We will explain this to you in detail in our response.

1. **DATA PORTABILITY**

You have the right to access your data in a format which allows you to re-use and share it with other organisations should you wish. As such, we will provide your data in a structured, commonly used and readable form.

1. **RIGHT TO OBJECT**

As a patient, you have the right to object to personal data about you being used or shared.

You also have the right to restrict the use of data the practice holds about you. If you do wish to object, please contact the practice. This will prevent your confidential information being used other than where necessary by law.

If you are a carer and have a Lasting Power of Attorney for health and welfare then you can also object to personal data being used or shared on behalf of the patient who lacks capacity.

If you do not hold a Lasting Power of Attorney then you can raise your specific concerns with the patient’s GP. If you have parental responsibility and your child is not able to make an informed decision for themselves, then you can make a decision about information sharing on behalf of your child. If your child is competent then this must be their decision.

**Objections / Complaints**

Should you have any concerns about how your information is managed at the practice, please contact our Data Protection Officer

Linda Mizen, Practice Manager

University of Warwick Health Centre

Health Centre Road

Coventry

CV4 7AL

Tel 02476 524888

The practice will listen to your concerns and try and act upon the concerns raised as best we are able.

If you are still unhappy following a review by the GP practice, you can then complain to the Information Commissioners Office (ICO) via their website: [www.ico.gov.uk](http://www.ico.gov.uk)

**Changes to Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 25th May 2018.